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OVERVIEW

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

OPTIONS FOR SUBMITTING A STATE PLAN

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

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

Alternatively, a State may submit a Combined State Plan that meets the requirements described in this document and outlines a four-year strategy for WIOA’s core programs plus one or more of the Combined Plan partner programs. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. If included, Combined State Plan partner programs are subject to the “common planning elements” (Sections II and III of this document) where specified, as well as the program-specific requirements for that program where such planning requirements exist separately for the program. The Combined State Plan partner programs are—
• Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.)
• Temporary Assistance for Needy Families Program (42 U.S.C. 601 et seq.)
• Employment and Training Programs under the Supplemental Nutrition Assistance Program (Programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4))
• Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
• Trade Adjustment Assistance for Workers Programs (Activities authorized under chapter 2 of Title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
• Jobs for Veterans State Grants Program (Programs authorized under 38, U.S.C. 4100 et seq.)
• Unemployment Insurance Programs (Programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
• Senior Community Service Employment Program (Programs authorized under Title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
• Employment and training activities carried out by the Department of Housing and Urban Development
• Community Services Block Grant Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))
• Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

* States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development and programs authorized under section 6(d)(4) and 6(o) of the Food and Nutrition Act of 2008 that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

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

• The **Strategic Planning Elements** section includes analyses of the State’s economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State’s workforce development system and alignment strategies for workforce development programs to support economic growth.
• The **Operational Planning Elements** section identifies the State’s efforts to support the State’s strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:
When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.* States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations.

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

This is Oklahoma’s 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 Oklahoma State University-Oklahoma City. The Plan discusses strategies, goals, and accomplishments implemented through the state’s seven local workforce development areas, under Title I, also 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).

The plan covers the period from April 1, 2016 to June 30, 2020. The initial plan submitted in 2016 was developed in consultation with Governor Mary Fallin and the Governor’s Council for Workforce and Economic Development (GCWED or Governor’s Council), which serves as the statewide workforce development board. OOWD convened partners from OESC, DRS, and ODCTE. Representatives from economic development, education, the business community, and other interested parties (though the state’s Key Economic Networks (KENs), discussed in section II, A-C) were consulted through their involvement on the GCWED, State Workforce Youth Council, now the GCWED Youth Program Committee, and local workforce boards.

The initial plan submitted in 2016 provided opportunity for discussion and feedback in forums with the Oklahoma Association of Workforce Development Boards, and GCWED committees, including the Workforce System Oversight Committee and the Career Pathways Committee. The original version of the plan was posted to the Oklahoma Works website (www.OklahomaWorks.gov) in January 2016 for a 30-day comment period. Comments were reviewed and, where practical, incorporated.

This modification to the plan was conducted in early 2018. Leadership from each WIOA Core Partner program selected individuals to participate on a State Plan Committee. Those individuals met on multiple occasions to jointly modify individual program components and joint components.
of the plan. A Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis was conducted with the Committee on January 31, 2018. The modification process and schedule was posted on www.oklahomaworks.gov outlining open meetings on the following dates:

- February 5, 2018, 9am, (OSU-OKC, Business Technology Room 305, 900 N. Portland Ave. Oklahoma City, OK)
- February 9, 2018, 9am, (OSU-OKC, Business Technology Room 304A, 900 N. Portland Ave. Oklahoma City, OK)
- February 20, 2018, 1:30pm, (OSU-OKC, Business Technology Room 305, 900 N. Portland Ave. Oklahoma City, OK)
- March 9, 2018, 9am, (OSU-OKC, Business Technology Room 304A, 900 N. Portland Ave. Oklahoma City, OK)

The modification will be posted for 30-day public comment in February 2018, and will close March 4. Comments received will be reviewed and incorporated, where practical. The modification is scheduled to be approved at the quarterly meeting of the GCWED on April 27, 2018.

This process ensures that the State Plan is a living document, ever evolving and provides value and focus to our efforts to improve the efficiency and effectiveness of Oklahoma’s workforce development system.

**Plan Contact:**

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**Frequent Acronyms and Definitions found in Oklahoma’s WIOA Unified Plan**

Oklahoma State Agencies:

- **OOWD**: Oklahoma Office of Workforce Development;  
- **OSU-OKC**: Oklahoma State University-Oklahoma City  
- **ODCTE**: Oklahoma Department of Career and Technology Education;  
- **DRS**: Oklahoma Department of Rehabilitation Services;  
- **OESC**: Oklahoma Employment Security Commission;  
- **OSRHE**: Oklahoma State Regents for Higher Education;  
- **DHS**: Oklahoma Department of Human Services;  
- **SDE**: Oklahoma State Department of Education  
- **OMES**: Oklahoma Office of Management and Enterprise Services

Local Area and Regional Acronyms:

- **LWDAs**: Local Workforce Development Areas
• **LWDBs**: Local Workforce Development Boards
• **CLEOs**: Chief Local Elected Officials
• **COWIB**: Central Oklahoma Workforce Innovation Board
• **EWDB**: Eastern Workforce Development Board
• **NEWDB**: Northeast Workforce Development Board
• **SCWDB**: South Central Workforce Development Board
• **SWDB**: Southern Workforce Development Board
• **TAWDB**: Tulsa Area Workforce Development Board
• **WOWDB**: Western Oklahoma Workforce Development Board
• **Central Region**: Central Workforce Development Area
• **Northeastern Region**: Eastern Workforce Development Area, Northeast Workforce Development Area, and Tulsa Area Workforce Development Area
• **Southern Region**: Southern Workforce Development Area
• **Western Region**: South Central Workforce Development Area and Western Oklahoma Workforce Development Area

Federal Programs and Administration:

• **IELCE**: Integrated English Literacy and Civics Education
• **ABE**: Adult Basic Education
• **EFL**: Education Functioning Level
• **DSA**: Designated State Agency
• **SRC**: State Rehabilitation Council
• **ORC**: Oklahoma Rehabilitation Council
• **DVR**: Division of Vocational Rehabilitation
• **DVS**: Division of Visual Services
• **DAT**: Department of Rehabilitation Accessibility Team

Case Management Systems and Data Integration:

• **AJLA**: America’s Job Link Alliance, vendor of labor exchange and case management system for Title I, WPES,
• **OKJOBMATCH**: www.okjobmatch.com, Oklahoma’s labor exchange system operated by AJLA
• **LACES**: Literacy, Adult and Community Education System
• **AWARE**: records management for Vocational Rehabilitation
• **OKLAHOMAWORKS.GOV**: WIOA website for the State of Oklahoma and clearinghouse for workforce development efforts in the system

Partnerships:

• **KEN**: Key Economic Network is a geographical region with similar employment data and commuting pattern
• **KEN Champion**: Regional business leader who spearheads activities to align education and business/industry in a Key Economic Network region
• **Oklahoma Works System**: Oklahoma’s talent development system characterized by partner programs who provide services to businesses and job-seekers
• **Oklahoma Works System Partners:** 17 state agency leadership stakeholders who have investment in the workforce development system. Partners include: Office of the Governor, Office of Management and Enterprise Services, Oklahoma Achieves (State Chamber), Oklahoma Board of Private and Vocational Schools, Oklahoma Center for the Advancement of Science and Technology, Oklahoma Department of Career and Technology Education, Oklahoma Department of Human Services, Oklahoma Department of Mental Health and Substance Abuse Services, Oklahoma Department of Veterans Affairs, Oklahoma Department of Commerce, Oklahoma Department of Corrections, Oklahoma Employment Security Commission, Oklahoma Health Care Authority, Oklahoma Office of Educational Quality and Accountability, Oklahoma State Department of Education, Oklahoma State Department of Health, and Oklahoma State Regents for Higher Education.

• **Oklahoma Works Core Team:** Governor's designated Core Team for the Oklahoma Works System Partners who lead the Oklahoma Works initiative. Core team leadership includes the Governor's Office, OOWD, ODCTE, OSRHE, SDE and OMES.

• **Oklahoma Works WIOA Core Partners:** State level representatives of federal programs who are part of the unified plan, including all federal titles administered by four state agencies.

• **Oklahoma Works WIOA Data Group:** WIOA core partner data-specialist representatives

• **Oklahoma Workforce and Education Collaborative:** Oklahoma Works System Partners data group working to create a longitudinal data system linking education and workforce data for quality decision-making and accountability for program success

• **Oklahoma Works a proud partner of the American Job Center network:** Oklahoma’s chosen common identifier for the public workforce system

• **Oklahoma Works Centers or Oklahoma Works (One-Stop) Centers:** Formerly Workforce Oklahoma Centers, Oklahoma now utilizes the common national and state identifier

• **Oklahoma Works Center Partners:** local area partners providing services to clients in coordination with the Oklahoma Works Centers.

The initiatives and activities in this plan directly support Governor Mary Fallin’s strategic economic and workforce development vision known as Oklahoma Works and is consistent with state and federal law. Oklahoma Works, the state’s umbrella initiative, is inclusive of all State Agency Workforce System Partners who represent the voices of our target populations, including our WIOA Core Partners and is aligned to WIOA requirements. Thus, this plan specifically focuses on the WIOA Core Partners, but is part of a larger economic and workforce development strategy for the State of Oklahoma.
I. WIOA STATE PLAN TYPE

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

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

Combined State Plan. This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs, as well as one or more of the optional Combined State Plan partner programs identified below. No

COMBINED PLAN PARTNER PROGRAM(S)

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

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.) No

Temporary Assistance for Needy Families Program (42 U.S.C. 601 et seq.) No

Employment and Training Programs under the Supplemental Nutrition Assistance Program (Programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)) No

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o)) No

Trade Adjustment Assistance for Workers Programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.)) No

Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.) No

Unemployment Insurance Programs (Programs authorized under State unemployment compensation laws in accordance with applicable Federal law) No

Senior Community Service Employment Program (Programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.)) No

Employment and training activities carried out by the Department of Housing and Urban Development No

Community Services Block Grant Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)) No

Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532)) No
II. STRATEGIC ELEMENTS

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State’s current economic environment and identifies the State’s overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs to support economic growth. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs.

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

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

1. ECONOMIC AND WORKFORCE ANALYSIS

A. ECONOMIC ANALYSIS

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

I. EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

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

II. EMERGING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

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

III. EMPLOYERS’ EMPLOYMENT NEEDS

With regard to the industry sectors and occupations identified in 1 and 2 above, provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

A. Economic Analysis

Introduction

Using a methodology created by the Oklahoma Department of Commerce, Oklahoma has identified five key in-demand industry clusters, or economic systems, referred to as “ecosystems.” These ecosystems’ demand industries produce or provide similar goods and services and therefore have similar needs in workforce, infrastructure, and economic development. They provide Oklahoma with a significant advantage in an increasingly competitive global economy, exhibiting substantial potential for employment growth and offering wealth generating employment for Oklahoma workers. These ecosystems include Aerospace and Defense, Agriculture and Biosciences, Energy, Information and Finance, and Transportation and Distribution.
In addition to the five key ecosystems, four support ecosystems have also been identified. While these four complementary ecosystems demonstrate demand statewide, they are especially significant to and centered in geographically identified areas of the state. These include Construction, Education, Healthcare, and Manufacturing. It is within this broad ecosystem network that Oklahoma’s analysis for in-demand industry and occupations is presented.

Moreover, unique characteristics and needs identified by smaller geographical areas can be organized in four quadrants. These include Central (incorporating the major metropolitan statistical area (MSA) of Oklahoma City), Northeast (including the Tulsa MSA), Southeast, and Western (containing the smaller MSA of Lawton). When appropriate, any discussion regarding the topic at the regional level will be framed within these geographical designations.

While analyses were performed for all ecosystems at both the state and regional levels, only the analyses with significant findings are highlighted in this narrative.

i. Existing Demand Industry Sectors and Occupations

SOURCES: EMSI, VERSION 2017.4; OKLAHOMA EMPLOYMENT SECURITY COMMISSION; BUREAU OF ECONOMIC ANALYSIS; ASSOCIATED GENERAL CONTRACTORS

Energy:

Energy is a vital ecosystem to Oklahoma. The state boasts a long history of oil and natural gas production, beginning before statehood when oil was discovered in 1897. Since that time, energy industries have been critical to the economy of the state. Twenty years ago, in 1997, approximately 105 oil rigs were in operation and the Mining industry, including oil and gas extraction and the associated support industries, accounted for $3,658 million current dollars in gross domestic product (GDP). By 2014, 215 oil rigs were in operation and the GDP figure had grown to $38,925M; 19.6% of the overall state GDP. Unfortunately, the industry has suffered a recent downturn and in 2016, oil rig counts had dropped by 70% and the Mining industry accounted for only 10.2% of GDP. Worker layoffs occurred in these industries as oil demand decreased and prices slumped, however, despite this downturn, the Energy ecosystem continued to account for the largest percentage of GDP in the state and is now demonstrating indications of recovery with total production and the price of oil on the rise.

Currently, the industries included in the Energy ecosystem employ over 92,600 Oklahoma workers and that number is anticipated to grow by 3.3% by 2027. Between November and December of 2017, EMSI estimates an average of 58,754 unique jobs were posted for Energy ecosystem occupations with an average of 10,300 monthly hires, though due to data limitations, actual numbers may vary. The largest employing occupations in this ecosystem include Oil and Gas Roustabouts, Welders, Heavy/Tractor Truck Drivers and a variety of engineering specialties. Many of the positions in this industry are physical-labor oriented requiring only long-term on-the-job training, but with median hourly earnings of over $20. Career Technology center and industry-recognized credentials are available for many of the jobs in Energy industries, including Welders and Truck Drivers.

Healthcare:
In 2007, over 481,000 Oklahoma residents were age 65 years or older, accounting for 13.2% of the state’s population; by 2017, those numbers increased to 600,000 and 15.3% -- an increase of over 27% in population age 65 or over. By 2027, this age bracket is projected to rise to 735,000 or 18.0% of the total population. With the continuing increase in this aging cohort comes an ever-increasing need for healthcare professionals. As a result, the complementary ecosystem of Healthcare exhibits high levels of current demand in the state. In 2017, this ecosystem boasted the existence of 230,000 Oklahoma jobs - over 20% of the total of all jobs reported across all nine key and complementary ecosystems. The two metropolitan-based planning areas, Central and Northeast, account for 76% of those jobs; however, it is the rural areas of the state that face significant hiring challenges with earnings averaging 22% lower than the metropolitan areas and less than 40% of the demand met from within the region. The unemployment rates for Healthcare Practitioners and Technical Occupations consistently fall below the national rate at both the state and planning region levels, but most markedly in the rural areas where those hiring challenges are especially acute.

Registered Nurses, requiring a minimum of an Associate degree, are in particularly high demand statewide with over 22,600 total jobs reported, and an average of 3,950 job postings and 1,158 hires monthly. Personal Care Aides and Nursing Assistants, with lower educational requirements, are also highly desired, accounting for a total of nearly 28,000 jobs and 2,380 monthly hires. Physicians and Surgeons, Pharmacists, Optometrists, and Physical Therapists, all requiring doctoral degrees, round out the list of in-demand occupations in this essential industry.

**Construction:**

Finally, the Construction ecosystem also represents a large percentage of Oklahoma's in-demand industries and occupations. According to figures from the Federal Reserve Bank of St. Louis, new private housing units authorized by building permits numbered 811 in November 2016. In November 2017 this number climbed to 990; a 22% increase. While new home construction represents only a small percentage of demand within the Construction ecosystem, these figures serve as an indicator of the increased need for these types of skilled workers in the state. A 2017 workforce survey conducted by the Associated General Contractors of America (AGC) indicates that 75% of respondents in Oklahoma report trouble filling hourly craft positions. Another 20% indicate they experience issues filling salaried field positions. According to the study, there is also a concern regarding the quality of training available to Oklahoma residents wishing to enter this field. The adequacy of the local pipeline to supply these craft personnel was rated as "poor" by 55% of respondents.

Over 172,000 jobs were reported in construction industries in 2017 with an anticipated growth rate of 11.46% by 2027. The occupation of Construction Laborer accounts for 8,267 jobs reported in 2017, with an average of 918 monthly hires while the need for Cement Masons will increase by 28% by 2027. Demand is also high for other skilled workers in specialized trades: Carpenters, Glaziers, Welders, Plumbers, and Electricians, to name a few. Certificates and apprenticeships are traditionally available to prepare these highly skilled craftspersons.

While overall offering fewer numbers of jobs, the Construction industries in the Southeast and Western Planning regions represent the fastest growing ecosystem in the state with anticipated growth of 23.4% and 19.6% by 2027 respectively. Similar positions are in-demand at the regional level as at the state level with a somewhat greater emphasis on management in the form of First-Line Supervisors of Construction, and General and Operations Managers.

**ii-iii. Emerging Industry Sectors and Occupations/Employer’s Employment Needs**
Three particular industry sectors in Oklahoma stand out for consideration as emerging industries: Healthcare, Manufacturing, and a relatively new-to-Oklahoma industry aimed at addressing the exploding growth of wind power generation in the state.

**Healthcare:**

With regards to the Healthcare ecosystem discussed previously, not only is the sector growing at a rapid pace driving an increased need for staff, the industrial landscape is also experiencing metamorphosis. A 2016 report, "The Future of Jobs: Employment, Skills, and Workforce Strategy for the Fourth Industrial Revolution" authored by the World Economic Forum predicts that only 71% of skills required for healthcare occupations will remain stable by 2025. This statistic highlights the need for innovative strategies that address the transformational nature of the sector and the need to rethink many healthcare occupations that must evolve or be enhanced to meet future requirements.

In conjunction with a broad spectrum of industry experts including those associated with hospitals, long-term care facilities, and teaching institutions, a subcommittee of the Oklahoma Governor’s Council for Workforce and Economic Development initiated a project in 2016 to develop evidence-based recommendations that address the rapidly-changing needs of the state’s health care system and that identify emerging health care occupations. Industry representatives expressed a crippling need for recruitment and retention of physicians statewide with a focus on addressing the economic barriers to physician practice in Oklahoma’s economically depressed and medically underserved areas. Recommendations from the Health Workforce Subcommittee are to sustain and increase funding for graduation medical education and physician recruitment and retention programs. Additional recommendations aim to support initiatives that increase the supply of all healthcare professionals need to ensure the availability of well-trained, flexible interdisciplinary care teams. Further need was identified to address shortages identified in the nursing profession that have been a result of emerging and new roles for LPNs, RNs and APRNS in a health system that incorporates coordinated care and relies on new payment and reimbursement methodologies that impact demand. Additional input suggested combining or enlarging existing occupations with new skills, including creating a healthcare-specific information technology management occupational category and formalizing and expanding the profession of community health workers. This investigatory project is ongoing. However, the scope of Oklahoma’s healthcare industry and the associated occupational requirements must evolve to meet the future needs.

**Advanced Manufacturing:**

Like the Healthcare ecosystem, the Manufacturing ecosystem is also in a transformational stage. The World Economic Forum predicts an even lower level of skills “stability” for these industries than those for healthcare, at approximately 58%. As a result, 42% of skills in these industries are expected to evolve or become obsolete. Technological advances are expected to shift manufacturing into a highly sophisticated sector where specialized, skilled workers top the list of in-demand occupations. Representatives of manufacturing businesses on the Career Pathways committee echo this position. Manufacturing operations must often rely on flexibility to meet customer expectations and, as a result, need a flexible workforce to meet those requirements. Anecdotal information from owners and managers in Oklahoma stresses the need for a wide range of computer, mathematical, and engineering skills, allowing their workforce to program and utilize the computer-operated equipment now so prevalent in these industries. As traditional manufacturing jobs involving the completion of manual tasks decline, these innovative, recreated positions will experience a significant rise in demand.
Like the Healthcare ecosystem, the Manufacturing ecosystem is also in a transformational stage. The World Economic Forum predicts an even lower level of skills “stability” for these industries than those for healthcare, at approximately 58%. As a result, 42% of skills in these industries are expected to evolve or become obsolete. Technological advances are expected to shift manufacturing into a highly sophisticated sector where specialized, skilled workers top the list of in-demand occupations. Representatives of manufacturing businesses on the Career Pathways committee echo this position. Manufacturing operations must often rely on flexibility to meet customer expectations and, as a result, need a flexible workforce to meet those requirements. Anecdotal information from owners and managers in Oklahoma stresses the need for a wide range of computer, mathematical, and engineering skills, allowing their workforce to program and utilize the computer-operated equipment now so prevalent in these industries. As traditional manufacturing jobs involving the completion of manual tasks decline, these innovative, recreated positions will experience a significant rise in demand.

Renewable Energy:

Finally, Wind Electric Power Generation, an industry classified in the Utilities sector, is a significant emerging industry in the state. While a relative newcomer to the renewable energy field of Wind-generated power, Oklahoma has grown into a leader in the industry, ranking third nationally in installed wind capacity. According to the American Wind Energy Association, in 2016, Oklahoma wind farms provided between 8,000 and 9,000 direct and indirect jobs, including staffing for seven active facilities in the state which manufacture products specifically for the wind power industry. Most recently, in July 2017, as part of a $4.5 billion project to provide electricity to regional residents, Invenergy LLC and General Electric Co. announced plans to build the largest wind farm in the United States. The new development will be located in the panhandle of Oklahoma.

Between 2017 and 2027, the need for skilled workers in this industry is expected to rise by an average of 48% overall. Of particular need will be Wind Turbine Service Technicians with a projected increase in demand of 178% by 2027 and nearly five times as many job postings as the national average. Current data show that Oklahoma companies employ these technicians at a rate of 166% above the national average. As with any emerging industry, it is recognized that these projected growth rates may level off as the ongoing construction of new wind farms stabilizes.

Most employers for these positions request hard skills in a variety of technical areas: turbines, hydraulics, electronics, etc. The predominant soft skill (i.e. employability skill) required is problem solving (troubleshooting). Industrial Mechanics and Maintenance Technology certificates are available from Oklahoma Career and Technology system and 2-year colleges to assist job seekers in obtaining the training required for this position; however, most employers indicate they sponsor in-house training programs or incorporate on-the-job training for new employees. Power Plant Operators, General and Operations Managers, and Electrical Power-Line Installers and Repairers will also be required in greater numbers to satisfy the projected need of this industry.

Entrepreneurship

SOURCES: OKSTATESTAT.OK.GOV; OKLAHOMA DEPARTMENT OF COMMERCE; 2015 U.S. CENSUS STATISTICS OF U.S. BUSINESSES

The state of Oklahoma continuously takes steps to support the creation of businesses to address market demands and new market development. Small businesses employ more than five and fewer than 100 employees. Microenterprises employ five or fewer employees. The growth of these two business types demonstrates entrepreneurship and innovation.
In 2011, 1.95% of the labor force owned a small business. This figure dropped slightly in 2012 to 1.90% and has remained stagnant through 2014. Likewise, microenterprise ownership dipped from 16.99% to 16.7% in 2012 and 2013 before rising to 17.25% in 2014. As recovery from the recent recession continues, and the economy improves, growth is expected in both small business and microenterprise ownership.

According to the U. S. Census Bureau Statistics of U. S. Businesses, in 2015, most small businesses and microenterprises in Oklahoma provided Professional, Scientific, and Technical Services including 8,700 firms, each providing work for 99 employees or less. “Other Services” providers ranked second with 8,190 firms while Health Care and Social Assistance ranked third with 8,002 firms.

**Critical Occupations List**

The Oklahoma Office of Workforce Development (OOWD) constantly monitors in-demand and critical occupations across the state, including those discussed previously. The annual Top 100 Critical Occupations List is longitudinal and focuses on job growth, acknowledging the need for extended time frames to achieve higher levels of education necessary to prepare potential job applicants. These jobs emphasize the state’s desire to 1) meet labor demands so that businesses and entrepreneurs involved in all industries can grow and prosper, and 2) Oklahoma citizens can maintain wealth generating employment.

The methodology for compiling the Critical Occupations List was reevaluated and strengthened in 2017. Data are provided regarding current and future job projections (growth), earnings, educational requirements including the availability of a certificate or industry-recognized credential, annual openings, and job postings. The list is updated and released annually with a goal of informing policy makers, education experts, OOWD partners, and the public regarding the ever-evolving needs of industry and the workforce of the future.

**B. WORKFORCE ANALYSIS**

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA.* This population must include individuals with disabilities among other groups** in the State and across regions identified by the State. This includes: Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals. **Veterans, unemployed workers, and youth, and others that the State may identify.

**I. EMPLOYMENT AND UNEMPLOYMENT**

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

**II. LABOR MARKET TRENDS**

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

III. EDUCATION AND SKILL LEVELS OF THE WORKFORCE

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

IV. SKILL GAPS

Describe apparent ‘skill gaps’.

Population Demographics

SOURCES: EMSI, VERSION 2014.1

The Oklahoma population for the working age cohort of 20- to 64- years of age is contracting. Over the last decade, the number of residents in this age bracket has grown from 2.14 million to 2.27 million, an increase of 6%; however, between 2017 and 2027 projections indicate a loss of 34,000. As an overall percentage of the population, the working population is expected to experience a decline of 4.1 percentage points between 2007 and 2027. At the same time, the growth rate for youth, age birth to 19, the age group rising to replace retiring workers, is relatively stagnant. Between 2017 and 2027, the population in this age bracket is expected to increase by 38,000, a number barely sufficient to replace the 34,000 loss of the 20-64 years-of-age cohort.

With regard to race and ethnicity, Oklahoma’s total population is more diverse than the nation as a whole. In 2017, over 9% of Oklahoma residents identify themselves as American Indian or Alaskan Native compared with 1.3% nationwide. This statistic would be expected based upon the relocation of Native American tribes into Oklahoma’s historical Indian Territory. Blacks and Asians are significantly underrepresented. Blacks constitute only 7.9% of the population at the state level, but 13.5% nationally. Asians account for 6.4% nationally, but only 2.6% in Oklahoma. Likewise, ethnicity varies, with only 11.7% of Oklahomans reporting they are of Hispanic ethnicity, a figure significantly lower than the 19.2% reported nationwide.

Population growth in Oklahoma by 2027, within racial categories, is centered predominantly in smaller populations. The Native Hawaiian or Pacific Islander population is expected to increase by 19.0%; however, that is only a total change of 1,406 individuals. Likewise, the Asian population will increase by 18.3%, adding 16,730 new residents. The White population will grow the least by 2027, adding only 1.2%. With regard to ethnicity, the Hispanic population is predicted to increase seven times as rapidly as Non-Hispanics. Overall, the state will experience a growth of 15% or 62,375 new Hispanic residents. In comparison, the number of Non-Hispanic population is expected to increase by only 2.1%.

Table 1: Population Demographics

<table>
<thead>
<tr>
<th>Demographic</th>
<th>2007</th>
<th>Percentage of 2007</th>
<th>2017</th>
<th>Percentage of 2017</th>
<th>Projected 2027</th>
<th>Percentage of Projected 2027</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Labor Force Participation

SOURCE: 2016 AMERICAN COMMUNITY SURVEY 5-YEAR ESTIMATE

In the past 10 years, the civilian non-institutional population in Oklahoma has grown by 10%, from 2.7 million to 2.9 million; however, during this same timeframe, the labor force participation rate has steadily declined. In 2007, 63.5% of the population participated in the labor force; by 2016, that rate had dropped by 2.3 percentage points to 61.2%. At a time when the labor force participation rate was reaching a peak of 63.6%, in 2009, the unemployment rate also reached a high at 6.4%. In short, while more Oklahomans entered the workforce, a greater number were unable to find jobs.

Since 2007, Oklahoma's labor force participation rate has trended below the national rate, though the gap has narrowed. In 2007, national rates were reported at 66.0%; 2.5 percentage points above Oklahoma. Since 2008, national rates have consistently declined reaching a low in 2015 of 62.7%. In 2016, the reported rate rose minimally to 62.8%. During the same time period, Oklahoma’s participation rate proved more volatile, fluctuating up and down, posting a high of 63.7% in 2008 to the low cited previously as 61.2% in 2016. 2015 marked the narrowest gap between the national and Oklahoma rates with a differential of only one percentage point.
An examination of sub-groups of the population reveals that participation rates vary significantly by cohort.

- **Age** - For those Oklahomans of traditional working age (16 to 64 years), youth, age 16 to 19 years, exhibit the lowest labor force participation rates at 40.5%, though this figure is slightly higher than the participation rate at the national level of 37.6%. After peaking at 80% for the 25- to 29-year age range, participation rates generally decline, dipping to 52.9% for those individuals on the cusp of traditional retirement age, 60 to 64 years.

- **Race** - Of 70,876 individuals self-identifying as Some Other Race, 71.1% participated in the labor force. This was the highest percentage exhibited by any race in Oklahoma. The majority of Oklahomans, Whites, reported a rate of 61.2%. The lowest participation rate was experienced by American Indian and Alaskan Natives at 60.0%.

- **Gender** - Males, age 20 to 64 years, participate in the labor force at a much higher rate than females in the same age bracket, 80.2% compared with 68.4%, respectively.

- **Poverty Status** - Over 336,000 Oklahomans reported being below poverty level within the previous 12 months, 11% of the civilian non-institutionalized population. For this cohort, the labor force participation rate was only 48.5%. Respondents reporting to be at or above poverty status in the previous 12 months experienced a rate over 1.6 times that of poverty level residents at 80.7%.

- **Disability** - Less than one half of disabled individuals reported participating in the labor force (41.2%).

- **Educational Attainment** - Finally, labor force participation rates in Oklahoma are positively correlated with educational attainment. Oklahoma residents, age 25-64, with less than a high school diploma report participating in the labor market at a rate of 58.1%. For High School graduates, that rate increases by over 11 percentage points to 69.7%. For individuals who have earned a Bachelor’s degree or higher, the rate of increase in participation rate is even greater, demonstrated by a gain of over 15 percentage points, resulting in an overall rate of 85.0%

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**Unemployment**
In the last decade, Oklahoma’s unemployment rate generally trended below national levels. The greatest gap occurred in 2010 and continued into 2011 following the subprime mortgage crisis. The unemployment rates for both entities peaked in that timeframe, with the national rate a full 3 percentage points above Oklahoma’s rate, 8.9% compared with 5.9%. Between 2011 and 2015, the gap continually narrowed with Oklahoma experiencing a brief low of 4.4%. In 2016, the national rate had declined and Oklahoma’s had increased until they met at 4.9%. In 2017, both the nation and Oklahoma trended at 4.4%. In December 2017, both the state and national unemployment rates were reported at 4.1%. This equates to 76,000 Oklahomans who are participating in the labor force but are unable to find a job.

Specific cohorts within the Oklahoma labor force experience higher rates of unemployment. Youth, age 16 to 19 years, while trending below the national rate for the same age bracket, experience an unemployment rate of 18.9%, nearly twice that of the second-ranked cohort, age 20 to 24 years. With regard to race, regardless of ethnicity, the rate of unemployment for Black or African Americans alone was 10.8%. This rate is lower than the national rate of 13.3% but 1.8 percentage points above that of the second-ranked cohort, Native Hawaiian and Pacific Islander alone. Hispanics experienced an unemployment rate of 5.0%.

Individuals who are unemployed are seven times more likely to be looking for full-time work than for part-time work. Men especially seek full-time employment at a greater rate than women. For those Oklahoma residents who are only working part-time, most indicate the reason as noneconomic. Noneconomic reasons include such circumstances as childcare issues, participation in school or training, or family/personal obligations, among others.

Underemployment

Underemployment for Oklahoma may be measured to include residents who are:
1. Discouraged, having not searched for employment in the prior four weeks because they believed no jobs were available for them and therefore not included in the labor force;
2. Marginally attached, defined the same as those who are discouraged, but for any reason, not just the belief that there were no jobs available for them; and
3. Involuntary part-time workers, persons employed part time for economic reasons who are working less than 35 hours per week who want to work full time and are available to do so.

Accounting for these individuals would raise Oklahoma’s unemployment rate to 7.4%, an additional 3 percentage points for 2017.

**Industry Sector Employment**

SOURCES: OKLAHOMA EMPLOYMENT SECURITIES COMMISSION; EMSI VERSION 2017.4

For December 2017, seasonally adjusted nonfarm employment trended upward, adding 0.1 percent or 1,100 jobs that month. For 2017 as a whole, Oklahoma’s non-farm employment gained 20,400 jobs (1.2%).

Two of the industries previously identified as the state’s major growth industries, Construction and Healthcare/Social Assistance, posted the largest monthly job gains for December, reporting increases of 2,900 and 1,300 jobs respectively. Meanwhile, though increasing to a lesser degree, Wholesale Trade added 700 new jobs and Educational Services reported +200. These job gains were offset by losses in other industries. Accommodations and Food Services reported losses of 1,300 jobs for the month, while Professional, Scientific, and Technical Services was down by 1,100.

For the year of 2017, the highest job gains were reported in the following sectors: Construction (+8,200), Mining and Logging (+6,300) and Education and Health Services (+5,500).

According to EMSI, for 2017, the largest industry sector employer was the government with a reported 364,000 jobs at 5,704 payrolled business locations and average earnings per job of $58,900. Healthcare and Social Assistance accounted for 193,000 jobs at 12,153 payrolled business locations with average earnings of $54,076. The sector with the greatest per job average earnings was Utilities at $134,473 annually, though the number of jobs and business locations drop significantly to 11,375 and 445 respectively.

Since December 2016, total nonfarm employment in Oklahoma has risen by 20,400 jobs (+1.2%). Construction posted the largest gain in number of jobs at 8,200 (10.7%); however, mining and logging posted the largest percentage gain at 15.2%, adding 6,300 jobs during 2017. Manufacturing rose 2.4%, reporting a 3,000 job increase. Industry projections indicate that between now and 2027, Healthcare/Social Assistance will provide over 25,000 new jobs, a growth rate of 13%. Retail Trade, while estimated to gain approximately 13,000, still posts the second largest increase in newly created jobs. The industries of Accommodation and Food Services, and Construction are predicted to increase by 11,000 jobs.

**Populations with Barriers to Employment**

**Individuals with Disabilities:**

SOURCE: 2016 AMERICAN COMMUNITY SURVEY, 5-YEAR ESTIMATE

Over 2.3 million Oklahomans are between the traditional working ages of 18 and 64, 60.7% of the total population. Within that age bracket, 13.9% report at least one disability. In comparison, the
national rate is 10.3% for the same age group. Across the nation, Oklahoma citizens, age 18 to 64, report the 6th highest rate of disability, behind on Alabama (14.5%), Mississippi (14.8%), Arkansas (15.0%), Kentucky (15.8%), and West Virginia (17.4%). Labor force participation is low for these Oklahomans at just 41.2% compared with 61.2% statewide -- over 188,000 Oklahomans with disabilities are not in the labor force. Unemployment rates are also disproportionate at 11.8% for individuals with disabilities versus the statewide rate of 4.9%.

Youth, age 5 to 17, experience a disability rate of 6.3%. With the exception of young children under the age of 5, this is the lowest rate reported for any age bracket in Oklahoma. Together, the divisions of Vocational Rehabilitation and Visual services in the Oklahoma Department of Rehabilitation Services (DRS) provide employment services for people with disabilities. Oklahoma has set a goal to increase the percentage of DRS clients who find employment from 50% in 2014 to 60% in 2018. As of 2016, the employment percentage was 54% and efforts continue to meet this goal.

**Ex-Offenders:**


According to the U.S. Department of Justice, Oklahoma has 26,871 prisoners under the jurisdiction of state or federal correctional authorities. While no data are available to clearly define the employment status of Oklahoma’s ex-offenders, two national publications estimate that between 60% and 75% of ex-offenders are unable to obtain a job within the first year of release from incarceration.

The Oklahoma Department of Corrections and the Oklahoma Department of Technology Education (ODCTE) continue to collaborate to operate multiple vocational training programs to better prepare offenders for employment upon release. Through the Skills Centers School System, the ODCTE provides training to both incarcerated adults and youth by incorporating career technical education, employability, and life skills aimed at facilitating a successful transition from corrections to the workplace. According to a 2011 report from ODCTE, in 2010, CareerTech Skills Centers enrolled 1,427 in programs at juvenile facilities, community correction centers, and state correctional facilities. The same report indicated that 86% of program completers obtained employment and 75% had not been re-incarcerated after five years.

**Table: FY 17 Releases Who Had Program Needs Met**

<table>
<thead>
<tr>
<th>Inmates Released in FY17</th>
<th>Inmates Who Had Need Met</th>
<th>Percent with Need Met</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inmates Who Had Program Need Met</td>
<td>100%</td>
<td>95%</td>
</tr>
<tr>
<td>Program</td>
<td>Inmates Released in FY17</td>
<td>Inmates Who Had Need Met</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>--------------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>Education</td>
<td>4,314</td>
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</tr>
<tr>
<td>Substance Abuse Treatment</td>
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<tr>
<td>Cognitive Behavioral Programming</td>
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<tr>
<td>Career Technology</td>
<td>1,045</td>
<td>826</td>
</tr>
<tr>
<td>Re-entry Programming</td>
<td>10,944</td>
<td>2,482</td>
</tr>
</tbody>
</table>

According to the Oklahoma Department of Corrections, of the inmates released in fiscal year 2017 who were assessed with program need, 62% received education and 79% received Career and Technology training. However, only 23% received re-entry programming, demonstrating a need for the ex-offender population in Oklahoma.

State workforce partners realize ex-offender status serves as a significant barrier to employment and welcome innovation and partnerships in this area.

Veterans:

Source: 2016 American Community Survey 1-Year Estimates

According to the 2016 American Community Survey 1-year estimates, there were 145,000 veterans in Oklahoma with 107,000 of those participating in the labor force. This results in a participation rate of 73.9%; a rate significantly higher than the state average of 61.2%. An estimated 4,448 veterans were unemployed, resulting in an unemployment rate of 4.1%, lower than the 2016 state rate of 4.9%. Concerted efforts have been made to increase the employment of veterans, at both the state and national levels, in government and the private sector.

Race and Ethnicity:

Source: 2016 American Community Survey 5-Year Estimates
Oklahomans seeking employment face a number of challenges based upon race and ethnicity. As noted previously, unemployment rates are disproportionate for minorities versus whites. Individuals self-identifying as Black or African American experience unemployment rates nearly twice the state average at 10.8%. Regionally, the unemployment rate for this group rose even higher in Tulsa MSA to 11.9%. Oklahomans self-reporting as Native Hawaiian or Pacific Islander exhibit the second highest unemployment rate at 9.0%; however, this racial group is very small in Oklahoma, accounting for only 0.2% of the overall population. The unemployment rate for American Indian and Alaskan Natives is 8.6%. In comparison, for the same time period, unemployment of Whites was reported at 5%. Hispanics, regardless of race, also reported unemployment rates of 5%.

Median household incomes are also disproportionate by race. In 2016, Whites reported the highest median household income in the state at $51,237. For Black or African American households, the comparative figure fell to $31,200, the lowest reported among all racial categories, and only 60.9% of that reported by Whites. While most other races reported lower income than Whites, the disparity was also lower: Native Hawaiian or Pacific Islander, 84.8% of White; Two or More Races, 83.5%; American Indian or Alaskan Native, 77.6%; and Some Other Race, 74.4%. Only Asian Oklahomans reported higher median household income than Whites at $54,937.

**English Language Learners:**

**SOURCE: 2016 AMERICAN COMMUNITY SURVEY 5-YEAR ESTIMATES**

Over 254,000 Oklahoma residents between the ages of 18 and 64 report speaking a primary language other than English in their home. This represents 10.8% of the population in this working-age bracket. Spanish is the most commonly reported primary language with over 66% of English language learners speaking Spanish at home. As a whole, native Spanish speakers rate their perceived English proficiency the lowest with 31.1% indicating they speak English either “Not Well” or “Not at All.”

Asian and Pacific Island Language speakers rank second in prevalence, but at a much lower level of 16.2%, while 9.6% of English language learners speak Other Indo-European Languages. Oklahomans in these two groups rate their perceived English language proficiency at a much higher level than those speaking Spanish. Only 20% of Asian Pacific Island Language speakers rate their ability at “Not Well” or “Not at All.” Those who speak Other Indo-European Languages rate their ability at 6.9% for the same category. Communication is a key factor in successful employment, whether that communication occurs with employers, coworkers, peers, customers, or the public in general. These individuals may experience challenges to finding and keeping employment due to these language barriers.

**Low Income Individuals:**

**Sources: 2016 American Community Survey 5-year estimates (OKStateStat.gov),**

In 2016, 16.5% of Oklahomans reported income below poverty level. An examination of these data reveal subgroups included in this category are at significantly higher risk. Nearly 1 in 4 Oklahoma youth under the age of 18 experience poverty. Black or African Americans rate highest among racial groups at 29.0%. Oklahomans of Hispanic ethnicity exhibit poverty rates over twice those of Non-Hispanics, 26.2% versus 12.8%. With regard to educational level, poverty rates are inversely correlated to educational attainment. Poverty rates for individuals who have attained less than a
high school diploma were reported at 26.8% while Oklahomans in possession of a Bachelor’s degree or higher experienced poverty level rates at only 4.4%.

With regard to benefits provided to low income individuals, Oklahoma has established two goals:

- To increase the completion rate of Temporary Assistance for Needy Families (TANF) clients referred to career and technology programs or special projects in two-year colleges from 31.63% in 2014 to 40% by 2018; and
- Increase the percentage of families who, after reporting employment, remain off TANF for six consecutive months. The measure for this goal is to increase the success rate from 84.1% in 2013 to 93% by 2018.

Completion of college or training with a degree or certification in a skill is critical to finding reliable work and building a pathway to future growth in family income. As of 2016, Oklahoma met the first goal with a 40.40% completion rate. Work continues on the second goal with the latest data reporting a success rate of 81.61%.

Oklahoma has also created a goal to decrease the average number of weeks that recipients receive state unemployment insurance benefits from 16.58 weeks in 2013 to 13.9 weeks by 2018. Long-term reductions in individuals who are dependent on unemployment benefits would mean lower outlays from the unemployment insurance trust fund and lower taxes on employers. It also would likely indicate that unemployed Oklahomans are finding new jobs at a faster rate, a benefit to them as well as the overall economy. In 2011, recipients received benefits for approximately 17.1 weeks. That figure declined to 16.5 weeks in 2012 and remained stable until 2015 when the time period dropped once again to 15.7 weeks. In 2016, the rate rose to 17.8 weeks.

Age Group:

SOURCES: OKSTATESTAT.OK.GOV; 2016 AMERICAN COMMUNITY SURVEY 5-YEAR ESTIMATES; 2016 AMERICAN COMMUNITY SURVEY PUBLIC USE MICRODATA SAMPLE (PUMS)

The Bureau of Labor Statistics classify youth as those individuals between the ages of 16 and 19. Youth typically exhibit the highest unemployment rates of all age groups and that is true of Oklahoma; however, the unemployment rate has been trending downward. In 2013, the unemployment rate for 16- to 19-year olds peaked at 19.9%. The following year, that rate declined by 2.9 percentage points. For 2015, the latest data currently available, the rate had once again dropped, reaching a five-year low of 11.5%.

For the age bracket of 40 to 64 years, a cohort that is of particular interest with regards to discrimination risk and the protections afforded by the Equal Employment Opportunities Commission, the statewide unemployment rate was higher than the national average. Nearly 1.2 million Oklahoma residents reported being in this age category. Of that number, approximately 844,000 participated in the labor force. With nearly 39,000 unemployed, the resulting unemployment rate is 4.6%. This compares with 4.1% nationwide.

More Oklahomans are continuing to work longer, past the “traditional” retirement age of 65 and while participating in the labor force at much lower rates than other age groups, also enjoy slightly lower unemployment rates. In 2016, for those between the ages of 65 and 74 years, over 1 in 4 continued to participate in the labor force and experienced an unemployment rate of 4.6%, lower than the 2016 statewide unemployment rate of 4.9%. After reaching the age of 75, labor force participation drops significantly to 6.3% with a 2016 unemployment rate reported at 4.3%.
iii. Education and Skill Levels of Workforce

SOURCES: OKLAHOMA STATE REGENTS FOR HIGHER EDUCATION; OKLAHOMA DEPARTMENT OF CAREER TECHNOLOGY EDUCATION; EMSI VERSION 2017.4

According to the Oklahoma State Regents for Higher Education 2016 Annual Report, Oklahoma boasts 25 public colleges and universities. These public educational institutions offer instruction at 49 separate campuses located throughout the state. During the 2015-2016 school year, a total of 36,117 degrees and certificates were conferred to Oklahoma students, an increase of nearly 22% since the 2007-2008 academic year. Health professions were the most popular field of study, followed by business and education. In addition to the public colleges and universities, the report identifies 11 independent colleges and universities and 2 proprietary institutions offering students alternative choices for educational development at 14 locations. In 2016, these institutions report conferring nearly 6,000 degrees and certificates. Most degrees were conferred in business, with health professions and engineering ranked second and third.

Oklahoma also enjoys a robust Career Technology (CareerTech) system administered by the Oklahoma Department of Career Technology Education with 29 technology center districts operating 58 campuses. The schools serve both secondary school and adult learners, offering specialized career training in over 90 instructional areas. These CareerTech institutions reported 5,500 completions in 2016 at the postsecondary level.

All of these institutions positively contribute to the postsecondary (attainment above a high school diploma or equivalent) education levels of Oklahoma’s workforce. Since 2007, the state’s educational attainment has improved with a 2 percentage point increase in the residents possessing a Bachelor’s Degree or Higher and a corresponding 2 percentage point decrease in the number of citizens whose maximum educational level is a High School Diploma (or equivalent). However, Oklahoma continues to lag behind the national averages with regard to postsecondary attainment.
One in three Oklahomans achieved a High School Diploma or the equivalent. Overall, 46% have achieved a maximum educational level of a High School Diploma or Less. As indicated previously, the percentage of residents achieving a college or university degree is trending upward; however, Oklahoma still lags behind the nation by a cumulative six percentage point margin.

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<tr>
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</thead>
<tbody>
<tr>
<td>Less than 9th Grade</td>
<td>7%</td>
<td>5%</td>
<td>8%</td>
<td>6%</td>
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<tr>
<td>9th Grade to 12th Grade</td>
<td>8%</td>
<td>9%</td>
<td>7%</td>
<td>8%</td>
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<tr>
<td>High School Diploma</td>
<td>33%</td>
<td>32%</td>
<td>29%</td>
<td>28%</td>
</tr>
<tr>
<td>Some College</td>
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<td>23%</td>
<td>20%</td>
<td>21%</td>
</tr>
<tr>
<td>Associates Degree</td>
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<td>7%</td>
<td>7%</td>
<td>8%</td>
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<tr>
<td>Bachelor’s Degree</td>
<td>15%</td>
<td>16%</td>
<td>18%</td>
<td>18%</td>
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<tr>
<td>Graduate Degree or Higher</td>
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<td>8%</td>
<td>10%</td>
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<tr>
<td>High School or Less</td>
<td>48%</td>
<td>46%</td>
<td>44%</td>
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<td>Degree, All Levels</td>
<td>29%</td>
<td>31%</td>
<td>35%</td>
<td>37%</td>
</tr>
<tr>
<td>Bachelor’s Degree or Higher</td>
<td>22%</td>
<td>24%</td>
<td>28%</td>
<td>29%</td>
</tr>
</tbody>
</table>

Source: EMSI, Version 2017.4

Equity in Educational Attainment:

The variables of race and ethnicity figure prominently in educational achievement. With regard to race, irrespective of ethnicity, Asian residents exhibit the highest completion rates for college degrees at 47.5%; however, it should be noted that individuals self-identifying as Asian only represent 2.2% of this group. In comparison, 31.8% of Whites have attained this same level of education. The differential between races is particularly evident for American Indian or Alaskan Natives. While this racial group accounts for 8% of the cohort, second in representation only to the White population, it reports the lowest degree completion rate of all races at 23.6%.
The most significant educational attainment gap is revealed by an examination of data associated with ethnicity, particularly at the lower educational levels. Overall, 42.6% of Hispanics possess an educational level less than a High School Diploma as compared with 11.5% for individuals of Non-Hispanic ethnicity. Conversely, Hispanics obtain some level of degree at less than half the rate of Non-Hispanics, 15.6% to 32.2%, respectively. This poses a particularly significant challenge to the state as the Hispanic population in this age group is predicted to grow by 15% by 2027.

<table>
<thead>
<tr>
<th>Race</th>
<th>Percent Less than a High School Diploma</th>
<th>Percent with a High School Diploma</th>
<th>Percent with a College Degree</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Indian or Alaskan Native</td>
<td>17.6%</td>
<td>58.8%</td>
<td>23.6%</td>
</tr>
<tr>
<td>Asian</td>
<td>18.2%</td>
<td>34.3%</td>
<td>47.5%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>14.1%</td>
<td>60.0%</td>
<td>25.9%</td>
</tr>
<tr>
<td>Native Hawaiian or Pacific Islander</td>
<td>20.6%</td>
<td>53.7%</td>
<td>25.6%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>15.6%</td>
<td>55.4%</td>
<td>29.1%</td>
</tr>
<tr>
<td>White</td>
<td>13.2%</td>
<td>55.0%</td>
<td>31.8%</td>
</tr>
</tbody>
</table>

**iv. Skill Gaps**
In 2017, approximately 1.65 million jobs were reported in Oklahoma. By 2027, that number is expected to rise to 1.79 million, an increase of 140,700 jobs. Many of these newly-created opportunities will be in categories characterized by high-employment, low wage, and low educational requirements—the latter of which are not in line with the Oklahoma Works goals. As an example, Combined Food Preparation and Serving Workers, Including Fast Food, with median hourly earnings of $8.69, is expected to grow by 5,647 positions - 16%. Likewise, Retail Salespersons is projected to add 4,903 positions while Cashiers account for 3,709. All three of these examples require no more than short-term on-the-job training, though training certificates are available to facilitate job applicant entry into the occupations. This issue is not isolated to Oklahoma. The trend is also evident at the national level where three of the top four growing occupations require no formal educational credential and earn less than $11 per hour.

Despite the growth in these types of entry-level positions, thousands of newly-created jobs will also require certificates or industry-recognized credentials, postsecondary awards, or degrees. As discussed previously, the need for Registered Nurses, a classification with a minimum educational attainment of the completion of an Associate degree, is anticipated to grow by 10.7%, adding nearly 3,000 new jobs. The median hourly earnings for a Registered Nurse in Oklahoma is $28.49. Heavy and Tractor-Trailer Truck Drivers, requiring a postsecondary award and reporting median earnings of $19.28 per hour, and General and Operations Managers, requiring a Bachelor’s degree and experiencing median earning $37.47 per hour are also adding a significant number of new positions.

Due to this growth in occupations requiring postsecondary education, without intervention, Oklahoma’s workforce will experience a significant gap between current educational attainment and the projected educational requirements of these newly-created jobs. By 2027, only 33% of these jobs will require a High School Diploma or Less while 46% of Oklahoma residents have achieved this level of education. Conversely, 67% of new jobs will require postsecondary education - a certificate, industry-recognized credential or a degree. Only 55% of Oklahoma’s working-age population meet these criteria. In short, there is an excess supply of individuals with a High School Diploma or Less and a shortage of individuals to meet the needs of employers at the postsecondary and degree level - a 13 percentage point skills gap. Based upon projected population growth rates for 2027, an estimated 650,000 Oklahomans must obtain postsecondary awards in order to meet employers’ future needs.

Additionally, this projected 13 percentage point skills gap may be underestimated due to two key factors directly impacting the analysis:

- **Surplus of Graduate and Higher degrees.** Current projections indicate that approximately 4% of new jobs will require a graduate degree or higher while 8% of working-age Oklahomans hold advanced degrees. This may place downward pressure on the increased need for Bachelor’s degrees as more highly trained job seekers accept positions below their educational attainment. It may also be assumed that many of these individuals could be drawn outside the state for employment better suited to their educational achievement rather than choosing to fill positions at a lower educational level. This scenario poses a challenge for Oklahoma employers to recruit and retain the most qualified, well-educated workforce available at this educational level.

- **Misalignment of degree majors.** The second factor that may impact the estimated skills gap of 13% is the possibility of a misalignment between degree specialties and employer need. While, on the surface, it would appear that Oklahoma currently reports a sufficient number
of individuals with Bachelor’s degrees to fulfill the anticipated 2027 need, the mere existence of a sufficient number of degrees is inadequate. Rather, the degrees must provide the appropriate training and necessary knowledge, skills, and abilities to fulfill the job requirements. This variable would be difficult to quantify since many degrees are flexible and do not restrict the recipient to a specific job type.

Overall, the need for individuals who have attained a postsecondary education by 2027 may be even greater than the 13% estimated by the analysis.

While the state is estimated to experience an overall 13% skills gap in the next 10 years, the gap is much more pronounced in two of Oklahoma’s planning regions. As might be expected, the skills gap diminishes by approximately 3-4 percentage points in regions which include the MSAs of Oklahoma City and Tulsa. However, in the Southeast and Western Planning Regions, dominated by rural counties with few large cities and low population densities, the gap grows to 26% and 18% respectively. A significant number of employers in these two regions will face challenges in recruiting local talent for new job opportunities.

**Launch Oklahoma**

In December 2016, Governor Mary Fallin issued an executive order aimed at overcoming the workforce skills gap, calling for the implementation of a statewide educational attainment goal. The initiative, known as Launch Oklahoma, seeks to develop strategies to increase the percentage of Oklahomans between the ages of 25 and 64 with education or training beyond high school to 70% by 2025. The strategic plan for the initiative was released in November 2017. It is believed that the goals and strategies contained in the report, when implemented at both the local and state levels, will contribute to improved postsecondary attainment among Oklahomans.

**2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS**
The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in Education and Skill Levels of the Workforce above, and the employment needs of employers, as identified in Employers’ Employment Needs above. This must include an analysis of –

A. THE STATE’S WORKFORCE DEVELOPMENT ACTIVITIES

Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop delivery system partners.*

* 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.

The State’s Workforce Development Activities

The state has enhanced, aligned and expanded its workforce development activities 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. Specifically, the first two years of the 2016 WIOA State Plan have been spent building stronger partnerships and coalitions, strengthening strategies, and building a strong state infrastructure on which to seek continuous improvement.

Strategic Planning and Relationship Building under Oklahoma Works

First, the Workforce system partner agencies have been heavily engaged in statewide strategic planning efforts that have influenced statewide workforce activities and strengthened the aligned focus of workforce partners throughout the state. These efforts include the initial and ongoing development of the Oklahoma Works Strategic Delivery Plan, which is a living document updated as changes in the state occur.

According to EMSI in Quarter Two of 2015, 46 percent of Oklahomans have a high school diploma or less as a level of educational attainment. Projections show that in 2025 only 23 percent of the state’s increasingly robust labor market (new jobs) will be accessible to Oklahomans who have at most a high school diploma. In other words, there is a 23 percentage point skills gap between the credentials Oklahoma’s current workforce possesses and what the state’s future economy will require.

Oklahoma understands the new minimum for success will increasingly include a postsecondary degree or credential. That is why Governor Mary Fallin established Launch Oklahoma in December
2016 to urgently boost the state's postsecondary attainment and close the workforce skills gap. Launch Oklahoma is a statewide goal to increase the number of Oklahoma workers with education or training beyond high school to 70 percent by 2025 so that businesses have the current and future talent pipeline they so desperately need. The Oklahoma Works Leadership Team, which included Career and Technical Education (AEFLA) and the Oklahoma Office of Workforce Development (Title I), was tasked with recommending strategies toward achieving the Launch Oklahoma goal. The recommendations were submitted to the Governor on October 13, 2017, and included strategies to address inequities in postsecondary attainment and assess alignment of degrees, certificates and credentials awarded to high-demand occupations.

The initiative is focused on four strategic objectives designed to address the barriers Oklahomans experience in obtaining workforce credentials, certificates and degrees:

- Increase Awareness: Promoting the importance of education and training;
- Ensure Access: Students are able to access tuition assistance and supportive services;
- Ensure College and Career Readiness: Students are prepared to enter and succeed in education and training; and
- Engage Employers: Employers play an active role in supporting Oklahomans to complete education and training.

Oklahoma Works is designed to increase the wealth of all Oklahomans through providing education and training for citizens to obtain quality employment. The rationale behind these efforts is that coordinating strategic priorities and plans across education, training, and industry will increase the wealth of all Oklahomans by providing employment opportunities for workers and ready availability of highly skilled talent for business and industry. The statewide initiative is built upon a coalition of businesses, educational institutions, state agencies, Workforce Development Boards, and other partners, and is overarching state strategy, but is fully aligned with the federal Workforce Innovation and Opportunity Act.

The Oklahoma Works initiative kicked off in 2015 with the Governor visiting each local Workforce Development Board area to speak with and listen to local business leaders, educators, state agency staff from the core partners and other workforce partners (16 total state agencies), Workforce Development Board members, and representatives from private organizations about our current skills gap and Oklahoma's plan to shrink the gap. Oklahoma calls these local coalitions Key Economic Networks, or KENs.

KENs are areas in which labor market data demonstrate geographic similarities with regard to occupations and commuting patterns. Within these areas, regional business leaders, educators, private organizations, Native American tribes, economic development organization staff, Workforce Development Boards, and workforce partner staff collaborate to identify solutions to local challenges that, when addressed regionally, will help to grow a skilled workforce and encourage wealth generation in the state. Each KEN region has a Champion, a regional leader from business and industry appointed by the Governor, who coordinates local efforts to support Oklahoma Works. The ultimate goal of these meetings was to hear from local businesses about their needs, and bring all workforce partners and contributors to the discussion on what can be done at the state and local levels. From these meetings, Oklahoma gained valuable insight into business’ needs, and many connections were formed among state agency staff, educators, and business leaders.
The strategic planning effort involved the WIOA Core Partners (Oklahoma Department of Rehabilitation Services, the Oklahoma Employment Security Commission, Oklahoma Department of Career and Technology Education, and Office of Workforce Development) as well as other state agency partners who are a part of the state’s workforce development system (Oklahoma Board of Private Vocational Schools, Center for the Advancement of Science and Technology Education, Department of Commerce, Department of Health, Department of Human Services, Department of Mental Health and Substance Abuse Services, Department of Veterans Affairs, Health Care Authority, Office of Educational Quality and Accountability, Office of Management and Enterprise Services, State Department of Education, and State Regents for Higher Education). In addition to these workforce system partners, the Oklahoma State Chamber’s Oklahoma Achieves (formerly the Oklahoma Educated Workforce Initiative), business leaders from all regions of the state, members of our Governor’s Council for Workforce and Economic Development, members of the Workforce Development Boards, and our state leaders were involved in the planning process. The resulting Oklahoma Works Strategic Delivery Plan was approved by Governor Fallin and key state leaders on December 8, 2015 and has subsequently been update twice to improve alignment and incorporate new strategies. This Plan is the overarching workforce development strategy to guide workforce development activities in the state.

Included in the plan are four objectives and multiple strategies on which all state workforce system partner agencies, including the Core Partners, are aligned.

Objective 1: ALIGN AND CONNECT: Develop, align and connect the education and training pipeline with the needs of the state’s regional economies by coordinating strategic priorities and plans across the education and workforce system. Oklahoma is aligning and connecting across state agencies, among state agencies and businesses in the local areas, and from the local areas to the state level.

1. Career Pathways: Improving Oklahomans’ exposure to Career Pathways and career options, along with the education and training required for entry into and advancement within a career is necessary in order to increase the number of Oklahomans in the education-to-workforce pipeline and to maximize our precious state and local resources.

2. Postsecondary Attainment and Work-Based Learning: Increasing postsecondary education and training attainment, including: increasing the number of Oklahomans with workforce readiness credentials (employability skills as defined by the Business Roundtable); increasing postsecondary opportunities in high school (e.g. AP courses, concurrent/dual enrollment); exposing students to career options early, increasing access to adult completion programs and work-based learning opportunities (e.g. internships, apprenticeships); and improving access to the supportive services necessary to complete postsecondary education and training (e.g. financial aid, tutoring, advisement).

3. Transportation services: better coordinate transportation services to Oklahomans in rural and urban areas, in order to address the fundamental challenge of connecting education, training, and work opportunities with those citizens who need them most.

Objective 2: DATA: Integrate and use workforce and economic development data to inform policy, track progress, and measure success:

1. Labor Supply and Demand Gap: Using data to decrease the labor supply and demand gap: utilize statewide data to decrease the skills gap by defining determinants and benchmarks
along all levels of education and training that lead to employability in identified economic systems, evaluating and utilizing competencies and assessments, and identifying and working to minimize existing data gaps (the state's approach to create a State Longitudinal Data System and connect that to Workforce Data, as required under the Workforce Data Quality Initiative);

2. OKJobMatch: Establish OKJobMatch.com as the one official job and labor exchange system for the state and case management system for all Title I program data. OKJobMatch, a shared system between the Oklahoma Employment Security Commission and the Oklahoma Office of Workforce Development, connects job seekers with employers, making it easier for job seekers to find jobs and for employers to find candidates while improving the accuracy of data available to decision-makers;

3. Common Connectivity: Create a common intake portal in the state’s workforce centers which allows State service providers to better identify the eligibility of citizens and refer them to appropriate providers, ensuring more Oklahomans can enter and remain in the workforce.

Objective 3: PARTNERSHIPS: Build partnerships between local industry and education at the regional level:

1. Key Economic Networks (KENs): Cultivate and maintain productive relationships between regional employers, educators, and other workforce partners to ensure an appropriately skilled workforce.

Objective 4: RESOURCES: Optimize the use of resources and incentives:

1. Optimize Cross Agency Resources: identifying and recommending creative, cross-agency, and cross-sector funding models that support similar workforce programs and include agency programs that potentially benefit from public-private partnerships.

2. Connect and Learn: Engage with school districts to enhance their ability to acquire adequate broadband and Wi-Fi to meet the 2018 Federal Standards for students to enable the delivery of meaningful digital curriculum and supplementary programs.

3. Performance Funding Practices: Identify national best practices for performance funding programs and work with Workforce System agencies to employ performance funding strategies. The goal is to encourage agencies to implement meaningful initiatives to improve outcomes based on performance funding models.

4. Access for Success: Facilitate a coordinated effort between private industry and postsecondary institutions to support the start-up, recruitment, growth, and retention of companies by leveraging existing intellectual assets, programs, and state-of-the-art facilities available in Oklahoma’s postsecondary education systems.

Underpinning all Oklahoma Works efforts are the five Driver (Aerospace and Defense, Agriculture and Biosciences, Energy, Information and Financial Services, and Transportation and Distribution) and four Complementary Ecosystems (Construction, Health Care, Education, and Creative Industries), as well as the 100 Critical Occupations (growth and demand occupations) within these ecosystems. Additionally, Oklahoma Works partners developed a comprehensive asset map, which describes the current workforce resources and activities in Oklahoma. Together these foundational pieces tie all partner initiatives together in an aligned, cohesive direction.
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.

According to a 2018 Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis conducted with WIOA Core Partners, accomplishments since 2016, include but are not limited to:

ALIGNMENT:

- Further development of the Oklahoma Works Strategic Plan with additional strategies to strengthen broadband access, and facilitate entrepreneurship.
- Creation and distribution of a transportation asset map to identify gaps and duplication impacting access to school and work.
- Development of “Oklahoma Works for All,” a pilot project across WIOA Core Partners and private partners for customized employment supports for businesses and potential employees with intellectual and developmental disabilities to be tested in the South Central Workforce Development Area.
- Development of “My Reemployment Plan,” a project across WIOA Core Partners to align case-management with readiness and transition services.
- Joint WIOA policy development and release to reflect WIOA administration change and WIA to WIOA transition, including: local and regional planning guidance and approval, competitive procurement of one-stop operators, and Oklahoma Works (One-Stop) Center certification of American Job Centers, among others.

DATA:

- New Information Management systems and improvements to existing systems across WIOA Core Partners including systems operated by OOWD, OESC, DRS and ODCTE.
- Creation of WIOA Core Partner Data and Performance Team to continue to discuss common reporting and enhancements across systems.
- Continuing efforts to coordinate across WIOA Core Partners for common intake procedures, including the addition of self-service options for Unemployment Insurance programs.
- The GCWED Healthcare sub-committee utilized LMI data regarding Healthcare Practitioner/Technologist and Healthcare Support occupations to initiate a project aimed at defining a new approach to the transformational nature of the healthcare industry, particularly with a goal of identifying emerging occupations within the industry.
- The methodology to produce the top 100 Critical Occupation List was revised and strengthened. The new methodology incorporated multiple selection criteria reflecting Oklahoma’s focus on job growth, wealth generation, and advanced education. For the first time, the methodology was published in conjunction with the list, providing users with not only the rationale supporting the selection criteria, but a detailed, replicable methodology.
- Labor Market Information is now produced for and provided to the State Department of Education for use in their Individual Career and Academic Plans for K-12 students and for use by counselors and teachers to inform students about career pathways in Oklahoma.

PARTNERSHIPS:
• Continuing efforts to cultivate and maintain productive relationships among regional employers, educators, and partners through regionalization, the development of MOUs for regional and local coordination of services.

• Ensuring government responsiveness to business’ needs by developing quarterly payment option for businesses to ease operations for payment of UI taxes.

• Development of Center and System monitoring across WIOA Core Partners and other Oklahoma Works System Partners to ensure operation of System is in alignment with utopian vision to be implemented by 2020.

RESOURCES:

• Development of additional strategies to coordinate resources across State Partners for future implementation.

• Continuing of and advancements in the “McAlester Center” pilot program in the Southern Workforce Development Area for Infrastructure Funding Agreements and Shared Costs agreements across WIOA Required Partners.

• Development of policy requirements for local workforce areas to spend 40% of funds on training and education in order to prioritize education and training hands to be spent directly on education and training. Such a requirement is challenging because it requires leveraging of other funds and services across programs and further resource blending strategies are being developed under a new task force.

System-Building and Infrastructure Development Under Oklahoma Works

Second, the WIOA Core Partners and required and optional one-stop delivery system partners are all engaged in system-building and developing and strengthening the talent pipeline infrastructure. Currently, the System Oversight Subcommittee (SOS), 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 (33 Oklahoma Works Centers located around the state). Oklahoma has 25 Oklahoma Works centers located around the state - 18 Comprehensive centers, 12 Affiliate centers, and 5 Specialized centers. Staff from the following programs/agencies are represented on this committee: Career and Technical Education (Perkins and Adult Basic Education) through the Oklahoma Department of Career and Technology Education, 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, the Department of Rehabilitation Services, among others. The SOS seeks input from the Workforce Development Boards and staff as needed when developing policy and guidance.

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 governs, manages, and accounts for the way the state issues Department of Labor WIOA monies. Also, the Council, in alignment with the Oklahoma Works goal, is tasked with using data to inform policy, track progress and measure success toward
ensuring wealth generation. The Council adopted state-level macro metrics in addition to federal, WIOA measures. Likewise, State workforce partners, departments, and agencies impacting career readiness developed state metrics for targeted wealth generation across Oklahoma. All of these metrics are reviewed annually and targets adjusted as needed. To promote transparency and accountability, Interactive data dashboards are publicly available through OKStateStat.ok.gov and OklahomaWorks.gov.

In early 2016, the GCWED underwent a structural revision to prioritize career pathways and health care workforce development under the Governor’s Council. The Governor’s Council has four standing committees that reflect the priorities of the state workforce system: Career Pathways Committee, the Health Care Workforce Subcommittee, Youth Programs Committee, and the Workforce System Oversight Committee.

Accomplishments identified in a 2018 SWOT analysis include, but are not limited to:

- Strengthening and development of the Equal Opportunity provisions of WIOA across federal programs. This has been accomplished through providing accountability structure through state agency MOUs, the designation of a State EO Officer located at OOWD, implementation of the system-wide Access for All initiative championed by DRS, translation services for Core programs provided by OESC, English as a Second Language provider grants issued by ODCTE, and the beginning of an EO study of the state and system to be provided to all partners to further develop statewide strategies for inclusion, access, and affirmative outreach.

**Increasing Educational Attainment and Quality Work-Based Learning Opportunities**

Third, the Launch Oklahoma education and training attainment goal established through Executive Order in December 2016 provides a common target for all education and training institutions, as well as workforce system partners. To meet the Launch Oklahoma goal, the state is targeting returning adults, adults without any previous postsecondary experience, as well as traditional students. Priorities of the initiative, include:

- Prioritizing education and training programs that lead to employment in Oklahoma’s high-demand industries and occupations;
- Increasing equity in postsecondary education and training attainment, including low-income, rural and minority populations;
- Expanding access to work-based learning opportunities, such as internships and registered apprenticeships; and
- Implementing success strategies that help students stay in education and training programs through completion.

In addition to the statewide goal, regional attainment goals have been established for Oklahoma’s seven Key Economic Network (KEN) regions. The regional goals will serve as the foundation for the work of the KEN Champion, or appointed local business leader, in relation to sector partnership strategies, career pathways development and strengthening relationships between all levels of business and education.

To support this work, the Oklahoma Office of Workforce Development (OOWD) commissioned a comprehensive, statewide study on non-completers from high school, Career Technology programs,
and higher education in order to better understand our State’s barriers to educational attainment. The study explored regional differences for dropping out, and key factors for what would assist in retention. The 2017 Post-Secondary Education Attainment Study informed the work of Launch Oklahoma by identifying barriers to starting or continuing post-secondary education, and proposes statewide solutions to achieve degree and credential completion for all Oklahomans. This study confirmed many national findings of barriers to degree completion, including: educational attainment correlates with income, whereas income increases as educational attainment increases, and lower educational attainment correlates with greater use of public assistance programs.

The study also revealed some unexpected findings crucial for all Oklahoma partners in business, government, education, and within the community to address. These issues include the lack of family and community expectations to attend, persist, and obtain a degree or credential from a post-secondary education institution, the prevalence of bullying as a factor in high school non-completion, and the low perception of the value of post-secondary education, among others.

This information serves as the foundation for, the work of the Oklahoma Office of Workforce Development, and our Workforce System Agency Partners, and Local Workforce Development Boards, Workforce Centers and One Stops, whom we will share all findings with, will be able to better message retention efforts, and better direct resources with regional precision. That is, to better identify the support services needed, and leverage collaborations among the partners to provide those services to ensure more Oklahomans receive education and training.

Oklahoma was also one of four states awarded a three-year Lumina/State Higher Education Executive Officer’s (SHEEO) Adult Promise grant to engage adult learners with higher education. The grant focuses on strategies to help adults who have completed some college credit, but have not earned a degree, to return to complete degrees in one of Oklahoma’s 100 Critical Occupations. The program aligns to and supports the state’s Launch Oklahoma education and training attainment goal, and is targeting adult students aged 25-49 years with incomes below $75,000. The Lumina grant funds provide infrastructure and outreach, but no direct dollars to support student tuition or wrap-around, supportive services. All funding to provide tuition, fees, and books to students will come from partners, including:

- Private sector business and industry;
- Workforce Development agencies;
- Native American Education offices;
- Nonprofit entities; and
- Higher education institutions who agree to seek degrees for these occupations.

Additionally, in November 2017, Governor Mary Fallin issued an executive order which established a statewide goal, known as Earn and Learn Oklahoma, to increase the number of work-based learning opportunities in the state to 20,000 by the year 2020. The “Earn and Learn” goal is intended to increase Oklahomans’ ability to explore career options and gain valuable work experience. OOWD is currently working to expand the number and diversity of apprenticeships in the state in order to strengthen career pathway options and respond to current and future industry workforce needs. The OOWD also supports internships, on-the-job-training, externships, and transitional jobs. These opportunities allow Oklahomans to explore different career pathways in order to find the right fit for their particular abilities and interests. Work-based learning also provides a strong platform for job-seekers to develop and hone the “soft skills” employers seek, including: problem-solving, effective communication, time-management, and teamwork. The three-
year "Earn and Learn" goal underlines the state’s commitment to creating a strong, integrated workforce system that is actively focused on expanding career opportunities in Oklahoma.

Fostering Regionalism Under Oklahoma Works

Finally, Oklahoma is continuing to move toward regionalism. Under WIA, Oklahoma was consistently moving toward a more system-level, regional focus. For example, Oklahoma implemented system certification, which encouraged and validated system-level practices and better coordination of services. With the roll out of WIOA, Oklahoma is continuing to move toward a more cross-sector, system-wide coordination of services and collaboration toward common goals. In 2016, Governor Fallin designated four planning regions across Oklahoma. Similarly, Core Partners have agreed that the memorandums of understanding among partners, typically developed at the local level, will now also be required at the regional level to demonstrate the state’s vision for regionalism and coordination.

Additionally, local workforce development areas have decreased from nine to seven over the past two years. The state now has seven local areas. In 2016, the Central and East Central areas merged to create the new Central Workforce Development Area. In 2017, the Southwest and Northwest local areas, both under the Western Region, consolidated to form one board now known as the Western Oklahoma Workforce Development Area. Subsequently, the state’s nine Key Economic Networks (KENs) have reduced to seven in order to mirror the local areas. Having Oklahoma’s KEN regions reflect the local workforce development areas will further strengthen the connection between education, training and workforce development activities.

Accomplishments according to a 2018 SWOT analysis include, but are not limited to:

- Shifting discretionary grants from local area recipients to regional recipients to encourage cooperation and collaboration across local area boundaries to better serve the needs of businesses and job-seekers in our increasingly geographically diverse economy. For example, sector strategy grant recipients were prioritized based on local partnerships but also multiple areas working within a region.
- Local Workforce Development Boards are increasingly talking across local areas to identify areas for administrative cost sharing and elimination of duplication. Barriers are often encountered, but local area leadership continues to pave discussions to identify regional strategies.

B. THE STRENGTHS AND WEAKNESSES OF WORKFORCE DEVELOPMENT ACTIVITIES

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

Oklahoma’s Workforce Development Activities have both strengths and weaknesses.

Initial analysis of the strengths and weaknesses of Oklahoma’s workforce development activities listed in section 2A, suggest that our workforce development system is well-suited for successful progress and change due to strong leadership as well as engaged and connected cross-sector partners, among other strengths.

The Core Partners, in consult with local workforce development area feedback, collaboratively identified strengths and weaknesses of the workforce development system, and the activities listed in 2A, including: Oklahoma Works Initiative outreach and planning through the 2015 Key Economic
Network tour, the strategic plan development meetings and resulting objectives, the coordination of the Core Partners and required partners in system-building, the business-led and data-driven restructuring of the Governor’s Council for Workforce and Economic Development, and the commissioned study on non-completers to guide policy on increasing educational attainment.

Additionally, a Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis of WIOA Core Partners was conducted in early 2018 to update the 2016 plan to 2018.

**Oklahoma Works System Strengths**

The 2016 plan described Oklahoma’s strengths as: strong leadership, workforce system partner engagement, unprecedented involvement from the business community, a strong postsecondary education system, and openness to regionalism.

1) Oklahoma benefits from having strong leadership to guide and push forward the state’s workforce development priorities through our state’s Governor and Cabinet Secretaries. Governor Mary Fallin chose workforce and closing the skills gap and increasing educational attainment as her key priority, as identified in her 2015 and 2016 State of the State addresses. Through her leadership, Oklahoma’s Workforce Partner Agency leadership, which includes Core Partner leadership and leadership from other partner agencies, meet once per month to discuss workforce issues and ways in which partnerships can be leveraged, and how to create a stronger state workforce system. These occur at the Office of the Governor each month. Each leader supports workforce development in the state by publicly promoting the initiative and workforce development activities in the state.

2) Also, as demonstrated by the cross-sector planning and teams under Oklahoma Works’ activities, Oklahoma boasts strong engagement and partnerships from our Core Partners and workforce system partners, and Workforce Development Boards. The State’s partners’ leadership are fully engaged in monthly meetings, mentioned above, where agencies provide updates regarding their education and training activities, and leverage partnerships with, and promotions of, training and education. Additionally, the System Oversight Subcommittee, the working arm of the Workforce System Oversight Committee of the Governor’s Council for Workforce and Economic Development is well represented of Core Partner staff and many required partner staff. This well-attended group meets approximately once per month to discuss system-level issues and provide system-level guidance and monitoring. This group is committed to collaborating on the state-level, with local-level guidance.

3) Additionally, Oklahoma has unprecedented involvement from the business community in workforce development efforts. Business leads the Governor’s Council for Workforce and Economic Development and Local Workforce Development Boards. Also, Business Champions in the Key Economic Networks (KENs), as a part of the Oklahoma Works initiative, and are engaged to vet and lead numerous Oklahoma Works efforts. Oklahoma is ensuring that business and labor market information is leading policy on the identification of skills needed, employment opportunities, and trends in industry is imperative for a responsive workforce development system. For example, the Governor’s Council for Workforce and Economic Development commissioned a yearly statewide labor market information report which will include real time data as well as education assets. This report will be vetted and used by existing state-level business advisory groups, such as the State Department of Education’s Business Advisory Group among others, to make institution-level policy, and disseminate among other business leaders not necessarily associated with the Governor’s
Council and WIOA programs. This yearly document will guide Career Pathway efforts across the state.

4) 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. This robust system supports Oklahoma’s path to adopt and accomplish a statewide postsecondary attainment goal.

5) Oklahoma has embraced regionalism. Previously, Oklahoma was already working toward a system-approach to workforce development by implementing system-certification and broader coordinated efforts among partners and programs.

With the addition of WIOA required Planning Regions, Oklahoma encourages further cooperation and collaboration among local areas in order to be more strategic with resources and performance targets. Thus, our eight local workforce development areas in Oklahoma are now represented by four regional planning areas. The designation of these areas has opened up new opportunities as these areas consider joint strategies and additional partnerships. For example, the Northeast planning region is meeting regularly and as of June 2016, has elected a leadership team consisting of local elected officials from each of the local areas in their region.

6) The State is supporting a local pilot project on the development of an infrastructure and cost-sharing processes template. The pilot reports to the System Oversight Subcommittee to collect best practices and lessons learned in order to determine the state-level guidance. All core partners are represented on the committee.

In addition to the six strengths outlined in the 2016 WIOA State Plan, the SWOT analysis conducted in early 2018 identified additional strengths as a result of statewide efforts over the past two years, and center on data, partnerships, resources, and system-building and infrastructure.

7) The WIOA Core Partners have strengthened our data infrastructure and alignment over the past two years as federal joint guidance has been released, and prior to release. Oklahoma embodies the phrase, “enough is known for action” and has been as proactive as possible in convening state partners to create advancements in data sharing and performance collaboration and reporting. Information management systems have been procured and enhanced at ODCTE, OESC, DRS and OOWD. Also, the OklahomaWorks.gov website, the clearinghouse for the workforce development system across partners has been further developed thanks to a private grant. The new site drives traffic to the state’s top resources for labor market information, career exploration, career exposure, and education and training opportunities and job opportunities in the state. The State’s top resources include the OklahomaWorks.gov website, OKJobMatch.com, OKCareerGuide, OKCollegeStart, and Oklahoma Edge.

8) Partnerships continue to be a strength of the Oklahoma Works system. Throughout the implementation of WIOA, collaboration and cooperation among state core partners is at an all-time high. Each agency has strong leadership, which echoes the strong leadership of the Governor identifying workforce development as a state priority. Each partner director or high-level designee participates in regular WIOA Core Partner Director meetings, regular convenings of the Local Area
9) Despite a lack of resources, the system has been adaptable by increasingly finding efficiencies, and responding to such a shortage with innovation and creativity. Funds across state programs are increasingly being blended as opportunities for collaboration and sharing of resources and capacity becomes the standard way of doing business. For example, multiple pilot projects are requiring cross-agency funds and participation, and agency directors are often eager and willing to share the financial and capacity burdens, as well as successes.

10) Finally, the SWOT analysis revealed a strength in the system-building and infrastructure development over the past two years. Internal processes and procedures and investments into creating a strong infrastructure 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.

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. The 2016 development of the State Plan revealed weaknesses centered on the decreasing state budget, limited capacity to deliver on the increased priority of workforce development, rising unemployment, challenges of creating a longitudinal data system, information systems, and common intake processes and procedures and technology.

1) In the 2016 legislative session, Oklahoma experienced a budget shortfall of $900 million before the legislative session began, which then grew to more than $1 billion by the end of the session. Many state agencies, including some of our Core Partners, were required to offer voluntary buyouts and layoff staff. Also, postsecondary institutions were required to increase tuition to cover losing state appropriations. Thus, any mention of limited resources and fund sharing elicits anxiety and protection of already limited resources. However, in order to fully realize the vision and strategic priorities of the State, the Partners must work hard to overcome these tendencies to better deliver education and training services to Oklahomans.

2) Limited resources continue to be a weakness both at the state and federal level. Oklahoma continues to not have a legislature-approved budget that identifies new revenue to supplement cuts to state agencies over the past few years. Similarly, federal budget discussions centering on the cuts to workforce investment programs of our WIOA core partners requires leadership to continue to move forward to resource-sharing conversations, but tread carefully as budgets may be further cut, or even eliminated. Such resource woes have negatively impacted MOU agreements, Infrastructure Funding Agreements, and Cost Sharing of the Oklahoma Works American Job Center system. Until funding availability, instability, and uncertainty can be addressed both at the state and federal levels, resource sharing conversations will continue to be difficult and will require even more efficiency and innovation.
3) Also, Oklahoma runs the risk of limited capacity to deliver on the ambitious strategies we’ve 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 burnout due to a lack of capacity to sustain the efforts with the current amount 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.

4) Although Oklahoma has had lower than the national average of unemployment for years, Oklahoma’s unemployment rate rose steadily for most of 2016. In January 2016, the state posted an unemployment rate of 4.1%. This increased to a high of 5.3% in September 2016. By December 2016, the rate had decreased by one-half of a percentage point to 4.8%. This decline continued between January (4.7%) and March 2017 (4.3%) before leveling off, remaining at 4.3% through June 2017. In July, the state unemployment rate surpassed the national rate - 4.4% versus 4.3%, respectively - and has remained above the national rate since that time. Between July and October, unemployment fluctuated between 4.4% and 4.5% before declining once again in November and reaching a low of 4.1% in December 2017.

5) 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.

6) 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.

7) 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. Despite two years into the State Plan, many of the weaknesses listed above require long-term vision and sustainable resources to improve. Though the state has implemented a new case management system for OESC and OOWD, challenges still exist as federal performance requirements continue to change two years into WIOA implementation. 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 fall 2018. Although efforts have been made to overcome system weaknesses, a few additional challenges were identified in a 2018 SWOT analysis. Such weaknesses focus on Resources, Alignment and Partnerships.
8) Despite efforts to be proactive on alignment using the motto “enough is known for action”, slow federal guidance and support has required the WIOA Core Partners to be more reactive than desired. The state’s hope is that federal administrative leadership and staff capacity will be restored in the coming months, and as such, the timeliness of guidance will be released with more frequency and with more advance notice. Such delay on guidance has created friction between the state and local areas, as local areas are required to implement processes and procedures across programs to serve businesses and job seekers daily. They are doing so with state interpretation when possible, but the federal lack-of-capacity is further adding liability to local and state administrations. Similarly, knowledge of services and activities across federal programs continues to be a barrier to address as the new federal law requires local and state staff to be generalists across programs in addition to subject matter experts. To account for this, the state must continue to foster cross-program training and exposure, as well as relationship building, to successfully implement WIOA.

9) 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 others’ advancements and progress, and ensure each is responsive to the others’ immediate and long-term needs.

C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

Oklahoma has demonstrated the engagement in and capacity to deliver on the State’s workforce development goals by leveraging volunteer business leaders, key economic networks across the state, 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. Over the past two years, the state has enhanced, aligned, and expanded capacity to address the education and skill needs of the workforce. This has occurred under the state’s and Governor’s broader workforce development initiative, Oklahoma Works, and through the implementation of 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, in alignment with the Oklahoma Works goal, has been tasked with using data to inform policy, track progress and measure success toward ensuring wealth generation, and governs, manages, and accounts for the way the state issues Department of Labor WIOA monies. State workforce partners, departments, and agencies impacting career readiness have developed metrics for targeted wealth generation across Oklahoma. The GCWED selected targets from these metrics, housed on OKStateStat.OK.gov, that form the foundation of the
Governor’s Council Dashboard. 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 early 2016, moving the ad hoc Career Pathways committee to a standing committee of GCWED. Along with Career Pathways, the Health Care Workforce Committee was also added as a standing committee. We now have four total standing committees of the Governor’s Council, including the Workforce System Oversight Committee and the Youth Program Committee.

Key Economic Networks (KENs) are areas in which labor market data demonstrate geographic similarities with regard to occupations and commuting patterns. Within these areas, regional business leaders, educators, private organizations, and workforce partner staff collaborate to identify solutions to local challenges that, when addressed regionally, will help to grow a skilled workforce and encourage wealth generation in the state. Each KEN region has a Champion, a regional leader from business and industry appointed by the Governor, who coordinates local efforts to support Oklahoma Works. These are volunteer business leaders who are working to identify other volunteer business leaders in their areas in order to support the grassroots efforts of regional workforce development activities. KENs provide much needed input to the State regarding business’ needs, and are supported by State leadership.

As part of Oklahoma Works, state workforce partners will intentionally align and connect education and workforce resources to better provide support and remove workforce barriers for the citizens of Oklahoma. Workforce partners will also establish an annual review of funding sources and incentives provided by federal, state, and local sources and chart the effectiveness of federal and state funding used by the state’s education, workforce, and economic development system. Additionally, departments and agencies impacting career readiness will continue tracking metrics for targeted wealth generation. Workforce System Partner Agencies, including the Core Partners, meet monthly to provide updates regarding their education and training activities, and to leverage partnerships with and promotions of training and education. Staff support for initiatives under the Oklahoma Works banner and for workforce development activities is strong, especially with agency and state leadership devoted to the State’s goal.

Also, 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 2015, Oklahoma’s Governor moved Workforce activities from the Commerce Cabinet Secretary to the Education Cabinet Secretary, and named a new Secretary of Education and Workforce Development for the state of Oklahoma. By shifting workforce to the education Secretary’s portfolio, she demonstrated the type of alignment necessary to ensure a better talent pipeline for Oklahoma. The new structure and new leadership were critical for demonstrating the state’s 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.

Oklahoma is encouraging the braiding of funding and leveraging of resources through the state’s new resource leveraging tool to be released in the fall of 2016. In this online tool, state agencies, including the core partners, can identify existing workforce development activities and send requests to partner. These requests are then supported and facilitated with the assistance of the Office of the Governor, if needed. Similarly, with the release of this tool, the Office of the Governor, under Oklahoma Works, in July of 2016, challenged each state agency and each Workforce Development Board, to identify one new partner (private or public) to engage.

With stagnant or declining funding from state and federal funding streams, the State is continually seeking more efficient ways to provide services to Oklahomans. Resources continue to be one of the largest threats to achieving the goals set forth in this plan, according to a 2018 Strengths, Weaknesses, Opportunities, and Threats analysis with WIOA Core Partners. 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, such as a 2018 Gubernatorial election to strengthen workforce advocacy, 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.

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B. STATE STRATEGIC VISION AND GOALS

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

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

The State’s strategic vision: In order for Oklahoma to meet labor demands, for businesses and entrepreneurs to grow and prosper, and for Oklahoma citizens to maintain wealth generating occupations.

Oklahoma Works is designed to increase the wealth of all Oklahomans through providing education and training for citizens to obtain quality employment, beyond the scope of WIOA (this cuts across all agencies regardless of funding streams). Our rationale is that coordinating strategic priorities and plans across education, training, and industry will increase the wealth of all Oklahomans by providing employment opportunities for workers and ready availability of highly skilled talent for business and industry. The statewide initiative is built upon a coalition of businesses, educational institutions, state agencies, and other partners, and is an overarching state strategy, but is fully aligned with the federal Workforce Innovation and Opportunity Act (WIOA).

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, in alignment with the Oklahoma Works goal, has been tasked with using data to inform policy, track progress and measure success toward ensuring wealth generation, and governs, manages, and accounts for the way the state issues Department of Labor WIOA monies. State workforce partners, departments, and agencies impacting career readiness have developed metrics for targeted wealth generation across Oklahoma. The GCWED selected targets from these metrics, housed on the newly created OKStateStat.OK.gov, that form the foundation of the Governor’s Council Dashboard. This dashboard facilitates the use of data 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:

- **Driver and Complementary Ecosystems:** Through a comprehensive quantitative analysis of 72 variables and over 48,000 data points, Oklahoma identified five Driver Ecosystems that help drive wealth generation in the state (Aerospace and Defense, Agriculture and Biosciences, Energy, Information and Financial Services, and Transportation and Distribution). An additional four Complementary Ecosystems that help expand wealth in the economy and provide the infrastructure and services to support driver systems were identified (Construction, Health Care, Education, and Creative Industries).
- **100 Critical Occupations:** These occupations represent the most pressing needs in each of Oklahoma’s Driver and Complementary Ecosystems 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.
- **Launch Oklahoma:** Established in December 2016 through Executive Order, Launch Oklahoma established a state-side goal increase the number of Oklahoma workers with education or training beyond high school to 70 percent by 2025 so that businesses have the current and future talent pipeline they so desperately need. The Launch Oklahoma Works strategy recommendations address inequities in postsecondary attainment and assess
alignment of degrees, certificates and credentials awarded to high-demand occupations. Populations of particular interest to boost attainment, include: adult and dislocated workers, African American, American Indian, Hispanic, rural and veteran populations.

Key Economic Networks (KENs) are areas in which labor market data demonstrate geographic similarities with regard to occupations and commuting patterns. The KEN regions align to the Local Workforce Development Board Areas, and are tasked with improving alignment between education and business. Within these networks, regional business leaders, educators, private organizations, and workforce partner staff collaborate to identify solutions to local challenges that, when addressed regionally, will help to grow a skilled workforce and encourage wealth generation in the state. Each KEN region has a Champion, a regional leader from business and industry appointed by the Governor who coordinates local efforts to support Oklahoma Works. Regional education and training attainment goals have been established for Oklahoma’s seven Key Economic Network (KEN) regions. The regional goals will serve as the foundation for the work of the KEN Champion in relation to sector partnership strategies, career pathways development, and strengthening relationships between all levels of business and education, including collaborations with Local Workforce Development Boards.

As part of Oklahoma Works, state workforce partners will intentionally align and connect education and workforce resources to better provide support and remove workforce barriers for the citizens of Oklahoma. Workforce departments and agencies impacting career readiness track metrics for targeted wealth generation, review data annually, and adjust targets as needs arise. Workforce System Partner Agencies, including the Core Partners, meet on a regularly scheduled basis to provide updates regarding their education and training activities, and to leverage partnerships with and promotions of training and education.

2. GOALS

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

A. Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers of employment* and other populations.**
B. Goals for meeting the skilled workforce needs of employers.

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

**Goal 1: Preparing a Skilled Workforce**

The goals for achieving the Governor and State’s vision for wealth generation, are both under the umbrella of Oklahoma Works, the workforce development initiative for the state, and specifically within the scope of WIOA at the state, local and regional levels.

**Strategic Plan**

First, under the umbrella workforce development initiative for the state, Oklahoma Works, the State adopted a strategic plan, 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) as well as 12 other state agency partners who are a part of the state’s workforce development system (education, commerce, health, veterans, human services). In addition to these public workforce system partners, input was gathered from private partners, including the Oklahoma State Chamber’s Oklahoma Achieves Initiative, business leaders from all regions of the state, and members of our Governor’s Council on Workforce and Economic Development. This Plan is the overarching workforce development strategy, beyond the scope of WIOA, to guide workforce development activities in the state.

Included in the plan are four objectives and multiple strategies on which all state workforce system partner agencies, including the Core Partners, are aligned.

**Objective/Goal 1: ALIGN AND CONNECT:** Develop, align and connect the education and training pipeline with the needs of the state’s regional economies by coordinating strategic priorities and plans across the education and workforce system. Oklahoma is aligning and connecting across state agencies, in the local areas among state agencies and businesses, and from the local areas to the state level. The State’s Align and Connect priorities are on the following issues:

1. **Career Pathways:** Improving Oklahomans’ exposure to Career Pathways and career options, along with the education and training required for entry into and advancement within a career is necessary in order to increase the number of Oklahomans in the education-to-workforce pipeline and to maximize our precious state and local resources. aligning Career Pathways and career options with the needs of Oklahoma businesses to ensure more Oklahomans are aware of viable paths to career entry and career building, exposed to careers at an earlier age, empowered with the information needed to best use valuable resources, and workforce-ready faster;

2. **Postsecondary Attainment and Work-Based Learning:** Increasing postsecondary education and training attainment, including: increasing the number of Oklahomans with workforce readiness credentials (employability skills as defined by the Business Roundtable); increasing postsecondary opportunities in high school (e.g. AP courses, concurrent/dual enrollment); exposing students to career options early, increasing access to adult completion programs and work-based learning opportunities (e.g. internships, apprenticeships); and improving access to the supportive services necessary to complete postsecondary education and training.
increase postsecondary opportunities in high school to ensure more students graduate high school with specialized knowledge or credentials to enter in-demand occupations, start businesses, or continue education with less time to completion;

3. Transportation Services: better coordinate transportation services to Oklahomans in rural and urban areas, in order to address the fundamental challenge of connecting education, training, and work opportunities with those citizens who need them most.

Objective/Goal 2: DATA: Integrate and use workforce and economic development data to inform policy, track progress, and measure success by:

4. Labor Supply and Demand Gap: Utilize statewide data to decrease the skills gap by defining determinants and benchmarks along all levels of education and training that lead to employability in identified economic systems, evaluating and utilizing competencies and assessments, and identifying and working to minimize existing data gaps;

5. OKJobMatch: Establish OKJobMatch.com as the one official job and labor exchange system for the state and case management system for all Title I program data. OKJobMatch, a shared system between the Oklahoma Employment Security Commission and the Oklahoma Office of Workforce Development, connects job seekers with employers, making it easier for job seekers to find jobs and for employers to find candidates while improving the accuracy of data available to decision-makers;

6. Common Connectivity: Create a common intake portal in the state’s workforce centers which allows State service providers to better identify the eligibility of citizens and refer them to appropriate providers, ensuring more Oklahomans can enter and remain in the workforce.

Objective/Goal 3: PARTNERSHIPS: Build partnerships between local industry and education at the regional level. Cultivate and maintain productive relationships between regional employers, educators, and other workforce partners to ensure an appropriately skilled workforce:

7. Key Economic Networks (KENs): Cultivate and maintain productive relationships between regional employers, educators, and other workforce partners to ensure an appropriately skilled workforce.

Objective/Goal 4: RESOURCES: Optimize use of resources and incentives to achieve the Oklahoma Works goal by identifying and recommending creative, cross-agency, and cross-sector funding models that support similar workforce programs and include agency programs that potentially benefit from public-private partnerships:

8. Optimize Cross Agency Resources: identifying and recommending creative, cross-agency, and cross-sector funding models that support similar workforce programs and include agency programs that potentially benefit from public-private
partnerships. Potential activities to achieve this include cross-agency training for
front-line staff delivering services to participants.
9. Connect and Learn: Engage with school districts to enhance their ability to acquire
adequate broadband and Wi-Fi to meet the 2018 Federal Standards for students to
enable the delivery of meaningful digital curriculum and supplementary programs.
funding programs and work with Workforce System agencies to employ
performance funding strategies. The goal is to encourage agencies to implement
meaningful initiatives to improve outcomes based on performance funding models
11. Access for Success: Facilitate a coordinated effort between private industry and
postsecondary institutions to support the start-up, recruitment, growth, and
retention of companies by leveraging existing intellectual assets, programs, and
state-of-the-art facilities available in Oklahoma’s postsecondary education systems.

Key Economic Networks

Key Economic Networks (KENs), under the Oklahoma Works initiative, are areas in which
labor market data demonstrate geographic similarities with regard to occupations and
commuting patterns. Since 2016, the KEN Champion has been coordinating efforts to align
education and training to employer needs by meeting with In the fall of 2015, the Governor
led a tour of all nine KEN areas across the state to hear from local business leaders, local
educators, workforce development board members, local agency staff from our workforce
system partners, and the State partners. The KENs collect and review data about retrieved
qualitative data from each KEN regarding the workforce challenges in rural and urban areas
of the state to inform their efforts. Labor market data and education attainment reports are
distributed to each region annually. In 2016, the KENs conducted a survey of businesses to
identify the top skill needs currently and in the future, as well as to gauge the relationship
between industry and education in each region. Two hundred and seventy-five business
leaders responded indicating employability skills, also known as soft skills, are a pressing
need. As a result, Oklahoma Works partners, including WIOA Core Partner agencies, are
incorporating employability skills training into career pathways programs, financial literacy
programs, and other initiatives.

Career Pathways

Oklahoma Works collaborates with public and private partners to build and strengthen
career pathways to meet the needs of state and regional employers. Initiatives of the
Governor’s Council for Workforce and Economic Development, the State Department of
Education and the KEN Champions have resulted in more educators participating in
externships, increased work-based learning opportunities for students, and the
establishment of goals to expand character education and decrease the number of high
school dropouts. Through the Oklahoma Works initiative and sub-committees of the
Governor’s Council, partners are targeting veterans, out-of-school youth and adult
dislocated workers through youth career exploration events, work-based learning
opportunities, dropout prevention and recovery strategies, and outreach to current and
former service members regarding education and training programs aligned to the state’s
growth and demand occupations.

Statewide Education and Training Attainment Goal
To prepare an educated and skilled workforce, the state must increase the number of Oklahomans with postsecondary education and training. In December 2016, the Governor established the statewide goal of increasing to 70 percent the number of Oklahomans with degrees, certificates, and workforce credentials by 2025. To meet this goal, the state will target returning adults, adults without any previous postsecondary experience, as well as traditional students. Priorities of the initiative, include:

- Prioritizing education and training programs that lead to employment in Oklahoma’s high-demand industries and occupations;
- Increasing equity in postsecondary education and training attainment, including low-income, rural, veteran, and minority populations;
- Expanding access to work-based learning opportunities, such as internships and registered apprenticeships; and
- Implementing success strategies that help students stay in education and training programs through completion.

Additionally, under direction of the Governor and the Governor’s Council for Workforce and Economic Development, priorities were established for local workforce development boards to direct more funds to training and education services. Initially, the goal was set for local boards to direct 15 percent of funds to direct training. Two years after implementation of the training minimum policy, all of Oklahoma’s local areas exceeded Oklahoma’s goal to spend a minimum of 15 percent of combined Adult and Dislocated Worker formula funds on training services with a combined total of 30%, which represented an 15% increase.

Although Oklahoma is pleased that our initial goals were set and met by the local areas, at the October 28, 2016 meeting of the Governor’s Council for Workforce and Economic Development, it was proposed that all Local Workforce Development Areas (LDWAs) will be required to expend at least 40% of their formula-allocated Adult and Dislocated Worker funds each program year on allowable training costs, that lead to a recognized postsecondary education and/or workforce credentials directly linked to an in-demand industry or occupation.

This new requirement is part of an ongoing effort to address the skills gap—the number of people trained and educated versus the number of jobs that are open—which has been identified by the Governor as one of the biggest challenges facing the state. Due to a significant number of open and unfilled positions within critical state occupations and sectors, there is an urgent need to train and educate the workforce in response to the skills gap. Specifically, there is a need to direct more WIOA Adult and Dislocated Worker funding towards these training and education programs that lead to recognized postsecondary education credentials and workforce certifications. Partner programs and services will need to be leveraged to offset many supportive services and other associated costs, to allow for these increased training expenditures.

Work-Based Learning

Oklahoma Works has prioritized diversifying and expanding work-based learning opportunities as a vital component of 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 like internships, apprenticeships and job shadowing, including the recent passage of legislation to make work-based learning easier for high school students to access. To further support work-based learning in Oklahoma, Governor Mary Fallin announced a statewide goal, known as Earn and Learn Oklahoma, to increase the number of internships and apprenticeships in the state to 20,000 by 2020. Increasing equity among apprentices is also a priority of Oklahoma Works’ efforts and we are exploring ways to recruit more individuals with barriers to employment.

As the result of a 2018 Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis with the WIOA Core Partners, job seeker goals also include the focus on specific populations, including for youth and adults. Over the next two years, the WIOA Core Partners would like to see:

For Youth:

- A greater focus and clearer strategies for out-of-school youth (14-18 years) with regard to educational attainment and work-based learning;
- The identification and addressing of barriers related to making progress with educational attainment and work-based learning (e.g., bullying), as identified in the 2017 Educational Attainment study produced by the Oklahoma Office of Workforce Development;
- An increased awareness of jobs that are currently available and lead to economic success, as demonstrated by labor market information.
- An increased awareness of other options/paths, in addition to college, such as Registered Apprenticeships;
- And, a fully deployed Individual Career and Academic Plan (ICAP) integrated with all students within the secondary school system as a preventative measure.

For Adults:

- Clearer strategies for ex-offenders, as ex-offenders represent a large population of Oklahoma’s workforce;
- 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;
- Greater assistance for those who experience a job loss and are supporting a family (e.g., re-training);
- 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
- 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.

Goal 2: Meeting the Needs of Employers

Second, Oklahoma intends to use all of the Oklahoma Works strategies, created in partnership with all workforce system partner agencies representing specific populations, to provide improved access and services to ALL clients. Through the career pathways and
the postsecondary attainment and work-based learning strategies, which Oklahoma intends to use as a way to better serve clients with barriers to employment, Oklahoma strives to connect employers with the workforce needed, create jobs, and, skill levels of all citizens—dislocated workers, veterans, individuals with disabilities, youth, individuals with limited English proficiency, low-income individuals, etc. (outlined in section: How State Plan Requirements are Organized).

Oklahoma has been creating a greater number of innovative opportunities to engage the private sector with education and training providers to ensure a workforce that is responsive to business and industry needs. To do this, our private and public partners across the state are investing in long-term strategies to develop and nurture our current and future talent pipeline, including:

**Oklahoma Educators and Industry Partnership (OEIP)**

Now in its tenth year, the Oklahoma Educators and Industry Partnership (OEIP) hosts teachers annually at workshops and industry tours designed to help educators better understand the careers available in demand industries throughout the state. In 2017, the Oklahoma Department of Career and Technology Education (ODCTE) partnered with OEIP to expand the number of events held, the number of industries showcased, and the number of teachers participating. Past years have showcased STEM jobs and employers in the state, which is a critical need identified by labor market data and industry leaders.

**Statewide Career Exposure Week**

Oklahoma Works hosted the first statewide Career Exposure Week November 13-17, 2017. The week-long event connected local students with area businesses to give our future talent the opportunity to explore the possibilities in Oklahoma that await them. Nearly 50 events 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. 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:

- 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 KEN 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.
Key Economic Networks (KENs)

Oklahoma's Key Economic Network (KEN) Champions have prioritized the goals of increasing internship and apprenticeship opportunities, increasing participation in teacher externship programs, increasing employability skills, and hosting partner engagement events to spearhead efforts to align and connect education and industry to meet regional workforce needs. Through KEN networks, business and industry have informed educators about local well-paying, in-demand career opportunities, and are actively recruiting a diverse group of industries to implement more apprenticeship programs. In 2017, the number of KEN regions was reduced from nine to seven. This modification was made to reflect the recent change in local workforce development board areas as identified in the state's unified plan under the Workforce Innovation and Opportunity Act (WIOA). Having Oklahoma's KEN regions mirror the local workforce development areas will further strengthen the connection between education, training and workforce development activities.

Entrepreneurship Initiatives

Supporting innovation, business growth, and entrepreneurship are vital components of a strong and diverse workforce system that is responsive to the needs of business and industry. In 2017, Oklahoma Works added two new strategies to the strategic plan that are focused on just that.

Innovate Oklahoma is an initiative that allows custom technology applications to be developed to directly meet the needs of the state departments and agencies, leading to innovation and efficiency in government. Innovate Oklahoma leads innovation in our state with the following goals:

- Grow the state’s economy by encouraging and supporting the startup technology community.
- Encourage innovation by creating meaningful interaction for engagement and feedback.
- Build strong partnerships between state technology agencies and other state entities to modernize state government.

The Office of Management and Enterprise Services (OMES) and the Oklahoma Center for the Advancement of Science and Technology (OCAST) lead the initiative and partner with other nonprofits to inform and engage the local technology community and startup companies in providing solutions. Oklahoma currently spends $170 million annually on technology professional services and application support. As we move off legacy technologies there is an opportunity to look at innovative solutions created by innovation projects. This gives an opportunity to provide state government challenges to local technology startup companies.

Innovate Oklahoma: is the first of its kind in the nation. The Initiative helps to create a niche market of innovative jobs, and can improve the quality of technology workforce inside Oklahoma. The silicon prairie can develop coders, programmers, innovators and entrepreneurs through new companies and startups. Growing Oklahoma's tech economy can help keep talent in our state and bring talent outside of our state.
Access for Success: Oklahoma has launched a new statewide initiative to leverage existing state resources to further spur innovation and support start-up companies. The initiative, known as Access for Success, was created to facilitate a coordinated effort between private industry and postsecondary institutions to support the start-up, recruitment, growth, and retention of companies within Oklahoma. The strategy leverages current intellectual assets, programs, and state-of-the-art facilities available in Oklahoma’s postsecondary education systems to expand applied research and development.

Currently, more than three-quarters of research and development is performed in six industry groups, with the bulk of private research and development funding residing in the manufacturing and technology sectors. Companies self-fund most of their research, which means smaller companies often lack the resources needed to further innovation in their fields. Traditionally, universities have focused on basic research, but Oklahoma has a unique opportunity to leverage its postsecondary resources to expand applied research and development, especially in engineering. Through such partnerships, Oklahoma will bring its universities forward as a competitive advantage while also showing practical value and a clear return on investment for the private sector.

Finally, to fully achieve an integrated and effective workforce development system, the state’s regions will build upon the state’s vision in implementing WIOA. For full alignment, the local and regional plans will align with the state’s plan and the Governor’s vision regarding the goals of 1) align and connect across the system and to local economies, 2) integrate data to make better policy and priority decisions, and track progress, 3) expand and strengthen partnerships with business and others to better meet the needs of business, and 4) optimize their use of resources. The local areas will provide improved access and services to ALL clients, including those with barriers to employment and special populations.

According to a 2018 Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis with WIOA Core Partners, additional goals related to better serving employers that Partners would like to see advancements in over the next two years, include data sharing and partnerships, both of which strengthen supports for job seekers as well as businesses.

With regard to data sharing, WIOA Core Partners have two year goals to increase collaboration and commitment among the partners, beyond solely compliance. Enhanced data sharing agreements and coordination among disparate data systems is necessary to both administer joint programs effectively to provide services, as well as to demonstrate progress to our business-led Council with reporting milestones and outcomes. Coordination includes improved data governance across agencies, and a commitment to streamline and reduce duplication where all possible.

With regard to partnerships, WIOA Core Partners would like to see increased senior level engagement within the WIOA Core Partners and among all required partners whose programs are provided in the Oklahoma Works American Job Centers. Such engagement includes participatory governance where communication is embedded in top level management across state agencies, and to front-line staff within state agencies. Progress toward this goal will improve dynamics between the state and local entities, and will provide a quality, human-centered system design for our customers, whether they are businesses or job seekers.
3. PERFORMANCE GOALS

Using the table provided in Appendix 1, include the State’s expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

Oklahoma will work with the Departments during the negotiation process to establish the negotiated levels of performance for each of the primary indicators for Program Year 2018 and Program Year 2019. For those performance indicators where there is insufficient data available on which to establish levels of performance, Oklahoma will continue to use baseline indicators determined by the Departments.

4. ASSESSMENT

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

The State will measure the overall effectiveness of the system as follows:

34. The WIOA performance measures applicable to the WIOA Core Partners include measures for education, credentials and progress in education for both youth and adults. As the state collects the information quarterly, Oklahoma Works will be able to assess the progress of the partners in meeting the State’s vision and goals.

35. The State Workforce System Partners, including WIOA Core Partners, will establish an annual review of funding sources and incentives provided by federal, state and local sources.

36. The State Workforce Partners will chart the effectiveness of federal and state funding for education, workforce and economic development systems throughout the state.

37. Biennial certification of local workforce boards will assure that the boards are fully appointed and include individuals with optimum policy making authority and expertise providing appropriate oversight and policy guidance to the local system.

38. Annual program and fiscal reviews of the seven local boards (as of the 2018 modification).

39. Monitor expenditure levels of the local areas and the core partners to assure services are flowing to participants.

40. Monitor the level of workforce-related complaints which reach state level review.

41. Certification of local one-stop centers as required by WIOA.

42. With assistance from the Department of Vocational Rehabilitation, assure the local one-stops are accessible and accommodate individuals with disabilities.

43. Requiring that Eligible Training Providers provide assurances through their applications for inclusion in the State List of Eligible Training Providers that their facilities are accessible and that reasonable accommodations are made for students as needed.

The local boards and state partners are very familiar with the continuous improvement principles. Results of assessments both positive and negative will be communicated to the
local boards and partners. As appropriate, corrective action including plans for improvement will be requested in accordance with continuous improvement principles and evaluated for their likelihood of success. Where performance, programmatic, or fiscal integrity is of concern, the State will communicate directly with the local board chair and the chief elected official.

C. STATE STRATEGY

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

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

OKLAHOMA’S CAREER PATHWAYS INITIATIVE

Career Pathways - Intended Outcomes

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.

In 2016 the Governor’s Council for Workforce and Economic Development changed the status of the Career Pathways Committee from ad hoc to a standing committee of the Council, to further demonstrate commitment to the Career Pathways strategy. Each State agency, including the Oklahoma Office of Workforce Development, Oklahoma State Department of Education (K-12), Oklahoma Department of Career and Technology Education (ODCTE), Regents Higher Education (two-year and four-year institutions), Department of Rehabilitation Services, Department of Human Services, Adult Basic Education, the Oklahoma Employment Security Commission and other partners that provide services to potential members of the talent pipeline has policies in place that align with WIOA career pathways definition.

Similarly, Career Pathway collaborators in Oklahoma include: Business and Industry, Workforce Development Boards and Service Providers, Oklahoma Employment Security Commission, one-stop centers, students and parents/guardians, State Department of Education (K-12), Adult Education, Regents for Higher Education, Oklahoma Department of Career and Technology Education, Department of Rehabilitation Services, Oklahoma Manufacturing Alliance, Veterans Affairs, Professional, trade and labor organizations, Community--based organizations, Department of Corrections, Oklahoma Office of Juvenile
All state, regional and local sector partnership strategies and career pathways are aligned to the five ecosystems (economic systems) of the state: Aerospace and Defense, Agriculture and Biosciences, Energy, Information and Financial Services and Transportation and Distribution, to ensure Oklahomans are exposed to the state’s 100 Critical Occupations, or growth and demand careers in wealth generating industries. Additionally, all career pathways and sector partnerships are aligned to the Department of Labor definition.

The Governor’s Council plays a key role in establishing the state vision for workforce and economic development integration. In support of career pathways and Oklahoma Works, 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, attainment of credentials/degrees, reducing the high school dropout rate, and career pathways.

Career Pathways Committee

- Adopted bylaws to develop a talent pipeline that helps employers fill critical skills gaps, with a particular focus on WIOA special populations.
- Support Key Economic Network (KEN) Champions, or regional networks spearheaded by a business leader, in their efforts to build and strengthen career pathways aligned to the state Driver and Complementary Ecosystems and Critical Occupations.
- Established subcommittees focused on: implementing strategies to increase the number of Oklahomans with a high school equivalency; identify trends in industries and anticipate future workforce skill needs based on changing industries; implement strategies to expand work-based learning opportunities to enter and continue along a career pathway; and engage industry associations/employers in support of education and training attainment strategies, teacher externships, and sector partnerships.
- Coordinating and supporting training and technical assistance to partners related to career pathways and sector partnerships.
- Committee membership includes WIOA Core Partner agencies, as well as broader partners, including education and training, business leaders, representatives from the local workforce areas and boards, and other community partners.

Youth Programs Committee

- Creates a workforce strategy for youth that aligns with youth initiatives and provides common solutions that coordinate with the state’s economic goals.
- Established subcommittees focused on: supporting the implementation of the Individual Career and Academic Plan in PK-12 public schools; implementing strategies that result in the attainment of high school equivalency credentials by youth/young adults; expanding the use of character education in PK-12 schools to
promote employability skills (soft skills) development; and establishing criteria for a ‘career-ready schools’ certification to include the promotion of career pathways to youth.

- Committee membership includes WIOA Core Partner agencies, as well as broader partners, including education and training, business leaders, representatives from the local workforce areas and boards, and other community partners.

Career Pathways - State and Local Efforts and Initiatives

Career Pathways is also a strategy prioritized in the Oklahoma Works Strategic Delivery Plan, adopted by the Governor’s Council on Workforce and Economic Development in 2015. The strategy falls under the objective of aligning and connecting the education and training pipeline with the needs of regional economies.

Under Oklahoma Works, the umbrella statewide workforce initiative which includes WIOA Core Partners, as well as businesses and 12 other state agencies, we continue to collaborate with public and private partners to build and strengthen career pathways at the state and regional levels. Initiatives of the Governor’s Council for Workforce and Economic Development, the State Department of Education and the KEN Champions have resulted in more educators participating in externships, increased work-based learning opportunities for students, and the establishment of goals to decrease the number of high school dropouts and expand character education to increase employability skills (soft skills). State and local strategies to build and strengthen career pathways include:

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.

OSDE introduced a pilot program study in the 2017-2018 school year and continue with additional school district pilots during the 2018-2019 school year. Implementation statewide will follow during the 2019-2020 school year. Students may start the ICAP process in sixth grade and update it every subsequent grade.

The Oklahoma State Regents for Higher Education (OSRHE) and the Oklahoma Department of Career and Technology Education (ODCTE) are jointly working with OSDE in their efforts to implement the ICAP process statewide. The two agencies are providing information and making available their electronic student career pathways portals to schools to use in ICAP implementation. The two systems are known as OKCollegeStart and OKCareerGuide.

OKCareerGuide: an easy online tool available for all Oklahomans to explore and guide their future. You can take assessments, identify occupations, establish education plans and, ultimately, connect to employers. Whether a youth is searching for career and college options or an adult looking for a new career path, OK Career Guide is the powerful tool to
provide all the career and educational resources you will need to chart your course for the future. Users are able to: Develop career awareness, Develop individual career plans, Create an online portfolio, Take assessments, Explore careers, Research and link to postsecondary schools, Locate scholarships, Set career goals, Connect to business and industry, and Build a resume and cover letter.

**OK College Start:** this easy-to-use online platform provides adults and students of all ages with resources like secondary and postsecondary academic planning, college admissions applications, financial aid options, electronic portfolio creation, and assessments to determine your ideal career path. Through the portal, in-state institutions can request and receive electronic transcripts, and students can apply for the Oklahoma's Promise scholarship.

In addition to the two state portals managed by the state’s postsecondary education entities, career pathways efforts are also aligned to and incorporate the following sites which serve as information hubs and link out to various partner sites.

**OKJobMatch:** Oklahoma's Title I case management system serves as a one-stop-shop for information about education and training for in-demand jobs, links to Oklahoma Works One-Stop Centers, and connects to job hunting resources like hiring events. The website will soon allow users to explore career lattices aligned to Oklahoma's 100 Critical Occupations, including real-time labor market information.

**OklahomaWorks.gov:** this website acts as the hub for all of the state’s workforce resources, linking to all of our local areas, partner agencies, and statewide initiatives and resource tools.

**Oklahoma Edge:** provides an electronic platform for education stakeholders to engage. Users can chat with business leaders and educators, explore careers aligned with Oklahoma’s 100 Critical Occupations, view videos of professionals in varying occupations, and learn about best practices happening across the state. This site is currently undergoing a soft launch and will be fully implemented over the next year.

**New Skills for Youth Career Pathways Grant**

The Oklahoma State Department of Education (OSDE) received one of ten statewide grants from JPMorgan Chase to build and strengthen career pathways for youth. The three-year, $2 million grant will help implement individualized academic plans for students, increase concurrent and dual enrollment with earned college credit and career certification, and better connect schools directly with business and industry. The New Skills for Youth grant aligns with the goals of Oklahoma Works and will help strengthen our efforts to increase educational attainment, improve access to skills-based education and training, and create a future-ready workforce.

**Oklahoma Educators and Industry Partnership (OEIP)**

Now in its tenth year, the Oklahoma Educators and Industry Partnership (OEIP) hosts teachers annually at workshops and industry tours designed to help educators better understand the careers available in demand industries throughout the state. This year, the Oklahoma Department of Career and Technology Education (ODCTE) partnered with OEIP to expand the number of events held, the number of industries showcased, and the number
of teachers participating. These teachers are encouraged to take information learned about varying demand and growth occupations and industries back to their classrooms by incorporating into curriculum and guiding students along career pathways.

**Digital Learning**

The Oklahoma Connect and Learn Initiative is a coordinated effort to bring high-speed broadband and digital learning opportunities to schools across the state. As part of this initiative, Oklahoma is partnering with telecommunications service providers and interested school districts to provide affordable fiber optic connections and Wi-Fi access to schools to better facilitate digital learning. A recent report found that 91 percent of Oklahoma school districts now meet the minimum connectivity goal, up from 85 percent in 2015. As part of these efforts, Governor Fallin signed HB 1576 into law in April 2017, which provides current and future teachers with professional development and training in digital and instructional technologies to enhance classroom instruction.

**Work-Based Learning**

Oklahoma Works has also 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 like internships, apprenticeships and job shadowing. In November 2017, To further support work-based learning in Oklahoma, Governor Mary Fallin announced a statewide goal, known as Earn and Learn Oklahoma, to increase the number of internships and apprenticeships in the state to 20,000 by the year 2020. In order to meet the 2020 “Earn and Learn” goal, Oklahoma Works has hired two full-time staff who are dedicated to leading statewide apprenticeship and work-based learning strategic planning and implementation.

In response to legislation recently passed to make work-based learning easier for high school students to access, the State Department of Education established a course code for internships. This allows high school Juniors and Seniors to receive credit for work-based learning beginning in the 2017-2018 school year. Oklahoma Works partners throughout the state are working together to strengthen local education and industry ties in order to increase the number of internship opportunities available to students.

Additionally, the Oklahoma Office of Workforce Development (OOWD) received a $200,000 ApprenticeshipUSA Apprenticeship Accelerator grant from the U.S. Department of Labor in 2016 to expand and diversify apprenticeship opportunities in Oklahoma. Since that time, 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, including internships and apprenticeships. These collaborations are in sectors that did not previously have such opportunities or are in businesses that did not previously offer them.

The main strategy of Oklahoma’s ApprenticeshipUSA Accelerator Grant is to focus on creating and expanding RA opportunities within the state’s wealth-generating ecosystems: Aerospace and Defense; Agriculture and Biosciences; Energy; Information and Financial Services; and Transportation and Distribution, as well as the complementary ecosystems
that help to expand wealth in Oklahoma’s economy: Construction, Health Care, and Education.

The inclusion of subject matter experts such as the Oklahoma Department of Career and Technology Education (ODCTE), the Oklahoma Manufacturing Alliance, the Oklahoma Center for the Advancement of Science and Technology and other established Oklahoma Works partners, including established apprenticeship programs, helped the State build upon existing strategies to expand and diversify Registered Apprenticeship (RA) as a viable workforce development strategy in Oklahoma.

Strategies for expansion and diversification also include outreach to specific industry sectors where there is potential for growth in occupations related to Healthcare, Advanced Manufacturing, and Information Technology (IT), as well as to underserved populations such as women, individuals with disabilities, formerly incarcerated individuals, minorities, veterans, and out-of-school youth.

Apprenticeship pilots continue to be a successful strategy for the expansion and diversification of Apprenticeship programs. Since that time, 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, including internships and apprenticeships. These collaborations are in sectors that did not previously have such opportunities or are in businesses that did not previously offer them. One leading example of Oklahoma’s efforts to expand the boundaries of apprenticeship in Oklahoma is the recently created Dell, Inc. apprenticeship. This apprenticeship program was the result of a pilot coordinated with a community college, a charter school, the employer sponsor and Oklahoma Office of Workforce Development. As a part of this work, Dell’s program recruits high school seniors and trains them to work as help desk technicians. This program represents the state’s first information technology apprenticeship as well as its first youth apprenticeship program. Dell recently launched Oklahoma’s first registered youth apprenticeship program for high school seniors working as help desk technicians. Additional RA pilot programs are being planned for the IT industry and healthcare industry.

The State has implemented the use of Apprenticeship Ambassadors and Key Economic Networks (KENs) Champions to promote the RA initiative. Apprenticeship Ambassadors are subject matter experts from existing apprenticeship programs who aid in outreach efforts and provide technical assistance to businesses interested in creating RA programs. KENs are designed to bring together regional business leaders, educators, private organizations, and workforce partner staff to identify solutions to local to local workforce challenges. Each KEN is led by a business representative selected by the governor, referred to as a KEN Champion.

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) is supporting the development and growth of sector partnerships in the local Workforce Development Areas by creating a grant opportunity for local areas and regional planning areas to apply for funding. The Oklahoma Office of Workforce Development (OOWD) will award funds to Local Workforce Development Boards (LWDBs) to support the establishment, strengthening, and expansion of sector partnerships, including the local and regional coordination of sector partnerships, sector strategies, and the identification of partnerships for career pathways development. Goals for this work include:

- Provide technical assistance to partners working to develop and implement sector partnerships and strategies for increasing education and training attainment.
- Align regional strategies to statewide goals and initiatives, including strategies for increasing postsecondary attainment, developing and strengthening career pathways, and expanding and diversifying opportunities for registered apprenticeship and other work-based learning opportunities.
- Promote credentials of value, growth and demand occupations, critical occupations in Oklahoma’s Wealth Generating Ecosystems, and industry-driven solutions for closing the state’s skills gaps.
- Develop and implement local and regional strategies to assist Oklahomans in increasing postsecondary attainment, entering critical occupations, and closing skills gaps. Targeted populations include African American, American Indian, Hispanic, rural, and 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 postsecondary 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 the sector partnership grants will inform and guide the work of the Career Pathways Committee.

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

Central to WIOA is the integration of service delivery among multiple workforce development programs. Oklahoma, under Oklahoma Works, has strong partnerships among state agencies, education institutions (PK-12, career and technical education, 2- and 4-year institutions), economic development organizations, and community-based organizations, both at the State level and at the local level with our Workforce Development Boards. Using the foundation built by these quality partnerships, Oklahoma will further align core and optional programs through the following strategies which support the ultimate goals of preparing a skilled workforce, and meeting the needs of employers, and which are fully aligned with the strategies developed under Oklahoma Works:

1) Continue to align and connect. Coordinate across agencies and programs to prevent “siloing” and duplication. For example, Oklahoma will continue to build on the foundational work of the “A New Day, New Way” process. What began as a pilot project in 2012 to create a system certification process to achieve alignment of education and training programs for the purpose of building a talent pipeline of appropriately skilled and credentialed Oklahomans to meet the demands of Oklahoma employers, has now been revamped and revived under the new requirements of WIOA. First, Oklahoma Works Center certification will be required, followed by a system certification process. Certification ensures the center and system are user-friendly, participant-focused, and business-driven. These certification processes ensure the center and system facilitates an integrated co-located partnership that seamlessly incorporates services of the core partners and other partners in a way that enhances the user-experience (both job-seeker and employer) and avoids duplication.

Also, due to the increased interest in workforce development initiatives and opportunities across the state, more opportunity is had to align and connect in order to address the issue of limited capacity. As duplicative efforts are discovered through continued partnership and communication, agencies and programs will identify more opportunities to align.

Furthermore, all workforce system partners have adopted and are aligned to Oklahoma Works’ foundational components, which ensures shared definitions and common goals.
These foundational components include: Oklahoma’s Driver and Complementary Ecosystems (wealth generating industries), 100 Critical Occupations (growth and demand occupations in ecosystems), and the Launch Oklahoma statewide education and training attainment goal (degrees, certificates and credentials of value to close the skills gap).

2) Utilize data. Ensure investments in employment and training programs are evidence-based, labor market driven, and accountable by utilizing and sharing historical and real-time local and state labor market data that is validated by business, and using common performance indicators to encourage shared accountability and transparency. This strategy improves access to labor market information for both employers and job seekers that will allow them to access job openings, review changing labor market trends and opportunities, and identify education, training, and support services. The WIOA Core Partners (Office of Workforce Development, Department of Rehabilitation Services, Employment Security Commission, Department of Career and Technical Education) formed the WIOA Data Group for Common Reporting to coordinate data collection for the purpose of current and anticipated federal reporting requirements. At a later point, other required federal partners will be added to this group. Reporting requirements include common performance indicators across programs, Eligible Training Provider performance reporting, and the WIOA Annual Report.

3) Coordinate and enhance data systems. To ensure the State can continue to utilize meaningful, reliable data, Oklahoma seeks to address a statewide weakness, and continue to improve data and case management systems, and the coordination among data and case management systems. This includes building the state’s longitudinal data system, connecting data among other agencies, and working towards a common intake system. Oklahoma has taken steps to improving our case management and labor market exchange by relaunching OKJobMatch. In addition to partnerships with the WIOA Core Partners, the Oklahoma Office of Workforce Development (OOWD) has formed an Education and Workforce Collaborative with representatives from the Governor’s Office, PK-12, career and technology education, higher education, the state’s consolidated IT agency, rehabilitation services, and commerce. The Collaborative works to identify ways to align education and workforce data to collect and meaningfully report students’ preparation for college and careers, and to increase the accessibility of performance data, including data reported by employment services and training providers. Without access to the right data, it is impossible for educators, policymakers, parents and the public to know how well schools prepare students for their next steps after high school graduation—and the return on investment and other cost benefit analyses including the use of and reliance on public social support systems. This group will assist with grant proposals for future longitudinal data funding.

4) Further expand partnerships. In addition to coordination and alignment among the core programs, Oklahoma seeks to strengthen the number of and relationship with required partners and other community partners, both public and private. This strategy also focuses on fostering partnerships with business, in order to improve and expand employer-driven initiatives and policy decisions to ensure Oklahoma is achieving its goal of meeting the needs of employers. For example, the OOWD is working to strengthen partnerships with state and regional business leaders by partnering to host regional and state convenings focused on workforce development and responsiveness to industry and employer needs. Convenings include: numerous State Summits focused on STEM, entrepreneurship, work-
based learning, and talent pipeline alignment; regional meetings hosted in collaboration with each Key Economic Network (KEN) Champion (business leader) to discuss local barriers to workforce development; and working with business leaders across the state to host Career Exposure Week events, which expose Oklahomans to growth and demand occupations through panel conversations, job shadows, career fairs, and industry tours.

Another example of strengthening partnerships with OOWD, state and regional business leaders, participants, and the state and local boards, is the annual Oklahoma Works Alumni Celebration. This event is a collaboration and coordination with all workforce partners to give recognition to participants of the workforce system and business leaders from all workforce areas in the state of Oklahoma. It celebrates the successes made possible by a workforce system, guided by business professionals and dedicated staff that work directly with customers on a daily basis. The Alumni Celebration is a ceremony to depict how our workforce development partnership in Oklahoma touches the success of its participants. To be eligible to be honored at this annual celebration, one of the requirements for the clients is to be assisted by more than just one of the partners involved to achieve this milestone. Many of the honorees have faced situations that seemed insurmountable and certainly must have thought themselves without opportunity to overcome their personal barriers. Some have been homeless and living out of their cars, some have been in abusive relationships, some have had drug and alcohol addictions to overcome, some have lost their jobs after having been employed at the same job for 30 years. The Oklahoma Works system was and will continue to be the place where many can find the tools that show them the steps they need to become productive and prosperous. Without the leadership of the business community helping us understand the skills and attributes that are needed by the workforce, we might be building the steps that lead nowhere. It is this unique partnership between public and private sectors that allow our workforce system in Oklahoma to be successful.

5) Optimize resources. With the designation of Oklahoma’s four planning regions, local workforce development areas have the ability to further leverage funds and serve more citizens by merging administrative responsibilities and better-coordinating services. Through the MOU process, we anticipate the partners will identify key areas of overlap to eliminate, further expanding the capacity of the system. Additionally, the OOWD established a 40 Percent Minimum Training Expenditure Rate, approved by the Governor’s Council for Workforce and Economic Development in October 2016. The policy requires each local area to spend no less than 40% of their Adult and Dislocated Worker funds on training costs that lead to a recognized postsecondary education and/or workforce credentials directly linked to an in-demand industry or occupation. This new requirement is part of an ongoing effort to address the skills gap—the number of people trained and educated versus the number of jobs that are open—which has been identified by the Governor as one of the biggest challenges facing the state. Due to a significant number of open and unfilled positions within critical state occupations and sectors, there is an urgent need to train and educate the workforce in response to the skills gap. Specifically, there is a need to direct more WIOA Adult and Dislocated Worker funding towards these training and education programs that lead to recognized postsecondary education credentials and workforce certifications. Partner programs and services will need to be leveraged to offset many supportive services and other associated costs, to allow for these increased training expenditures.
III. OPERATIONAL PLANNING ELEMENTS

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

A. STATE STRATEGY IMPLEMENTATION

The Unified or Combined State Plan must include—

1. STATE BOARD FUNCTIONS

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

The Governor’s Council for Workforce and Economic Development (GWED, 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 ecosystems (economic systems) 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

Complementary ecosystems, which help to expand wealth in the economy include:

1. Construction
2. Healthcare
3. Education
4. Creative Industries

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.

**Committees, Purpose and Goal**

**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 as an oversight board and will ensure compliance with WIOA. WSOC has the following 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.
- Work with regional planning areas to develop planning documents.

**Action Items**

- Coordinate and ensure support at the local and state level to the Oklahoma Works 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.

**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.

**Action Items**

- Work with the education system to support the prevention and recovery of affected youth.
- Develop strategies for both in-school and out-of-school youth.
- Develop a statewide plan in support of youth which would include a communication infrastructure that will inform and engage all stakeholders.
- Provide guidance to assist local areas in achieving compliance.
- Explore digital badges for students completing work ready and career ready modules.
- Develop workplace safety training with the Oklahoma Department of Labor for 7th-12th grade students participating in work-based learning.
- Increase awareness of high-school equivalency through partner networks with access to the population needing services.

**Accomplishments**

Since 2016, the Youth Programs Committee has refocused its mission to include prevention, concentrating on in-school youth and recovery, as well as addressing out-of-school youth. In 2017, the Youth Programs Committee created four subcommittee to address these issues. They include the Individual Career and Academic Plan (ICAP) Committee, the Character Committee, the Workforce and Career Ready Committee, and the High School Equivalency Committee. Each committee was tasked with determining strategic objectives and implementing those objectives. The ICAP Committee is focused on actively engaging students to enable them to understand their own interests, strengths, values, and learning style; create a vision for their future; develop individual goals; and prepare a personal plan for achieving their vision and goals starting in 8th grade and extending to Senior year. The Character Committee is working to encourage grade schools to improve employability skills by implementing Eleven Principles for Effective Character Education from Character.org and encourage schools to apply for State School of Character recognition. This recognition includes assessing schools on their school culture, making improvements, and measuring results. The High School Equivalency is focused on increasing the number of adult learners, by fostering a system that supports an increase in the self-confidence and motivation of adult learners, increasing public awareness of adult education learner, their barriers and challenges, fostering a system that provides a relatively easy transition from education to
employment, and increasing the opportunities for incarcerated individuals to receive their high school equivalency. In late 2017, the High School Equivalency subcommittee was moved to the Career Pathways Committee to better align with career pathway efforts and the focus on the adult population. A Youth Dropout Recovery Committee will replace the HSE committee and determine objectives that will assist in reducing high school dropouts in Oklahoma.

**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.

**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.
- Establishment of a physician workgroup and their resulting recommendation to focus on stabilizing existing programs that train, recruit and retain physicians and to examine the economic impact of physicians on the health care industry and the overall industry and economy

**Accomplishments**

The Health Workforce Subcommittee (HWS) is working toward a coordinated state approach for health workforce training, recruitment, and retention to ensure the state has a well-trained, adequately distributed, and flexible health workforce to meet the needs of the healthcare system. During the past year, the HWS has furthered this mission through the development of evidence-based recommendations to sustain and support funding of the Physician Manpower Training Commission which provides scholarship programs for physicians, nurses, and other health care providers. In addition, the HWS has aligned efforts in order to enhance the talent pipeline for health care occupations identified on the state’s
list of critical occupations. Work includes development of recommendations for aligning workforce development programs funded by the Oklahoma Health Care Authority with Oklahoma’s list of critical occupations. The HWS has also developed an in-depth report of workforce data for the health care occupations identified as critical in order to develop robust strategies to identify supply and skills gaps in order to improve and enhance the health care talent pipeline in Oklahoma. Finally, the HWS developed a research-based proposal for a Community Health Worker (CHW) certification process. This post-secondary certification would formalize the CHW profession in the state and establish a strong rung in the career ladder for nursing and other health care professions identified on the state’s list of critical occupations.

Recognizing that the nursing profession includes the largest percentage of health care workers and thus has significant potential to impact the goals of Oklahoma Works, a nursing workgroup has also been established. This workgroup will identify data limitations in the current forecasting methodology and will produce recommendations to overcome barriers to ensuring an adequate supply of LPNs, RNs, and APRNs in Oklahoma.

**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 Board certification process.
- Develop or research pilots, models and best practices.

**Action Items**

- Based on regional ecosystem industries and workforce and economic development data, identify skill gaps in specific occupations.
- Work with education and training partners to adopt or align curriculum in programs to meet needs of employers.
- Create awareness with business and industry, educators, local and regional leaders, KENs, community, students and parents to develop understanding and importance of career plans and career pathways.
- Hold regional summits or meetings on Career Pathways and Sector Strategies.
- Develop a Career Pathway pilot in each region of the state.

**Accomplishments**
The Committee adopted bylaws to develop a talent pipeline that helps employers fill critical skills gaps, with a particular focus on WIOA special populations. Committee members were appointed as Career Pathways Champions in order to support the Key Economic Network (KEN) Champions, or regional networks spearheaded by a business leader, in their efforts to build and strengthen career pathways aligned to the state Driver and Complementary Ecosystems and Critical Occupations. Additionally, subcommittees were created focused on: implementing strategies to increase the number of Oklahomans with a high school equivalency; identify trends in industries and anticipate future workforce skill needs based on changing industries; implement strategies to expand work-based learning opportunities to enter and continue along a career pathway; and engage industry associations/employers in support of education and training attainment strategies, teacher externships, and sector partnerships. The Committee is coordinating and supporting training and technical assistance to partners related to career pathways and sector partnerships across the state.

**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 council to collaborate on the initiatives included and the writing of the plan.

The Governor’s Council develops linkages through its members and also through the Workforce Partners Team. This regular contact among partners allows for constant collaboration on issues.

**Local Plans**

The Governor’s Council Workforce System and Oversight Committee will review local plans submitted from each of Oklahoma’s workforce development areas. This review ensures that the local plans align with the Unified State Plan and that those local plans are 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.

The Governor’s Council approved initial designations for four areas: Tulsa, Southwest, South Central, and Northeast. Initial designations are effective through June 30, 2017.

The Council approved conditional designation for five areas: Central, East Central, Eastern, Northwestern, and Southern. Conditional designations were effective through June 30, 2016.

In 2017, the Governor’s Council approved the re-designation of the Northwestern Workforce Development Area and the Southwest Workforce Development Area, both within
the Western Region, to create the new Western Oklahoma Workforce Development Area. The re-designation was assisted with State set-aside funds and with technical assistance provided by the Council.


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 7 and reduced the number of fiscal agents from 10 to 5, since 2010. As of the 2018 State Plan modification, Oklahoma has seven (7) workforce development areas and five (5) 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 05-2017, found on the OklahomaWorks.gov, website at http://oklahomaworks.gov/wp-content/uploads/2016/04/OWDI-05-2017-WIOA-LWDB-Membership.pdf, 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
- Eastern Workforce Development Board
- Northeast Workforce Development Board
- Western Oklahoma Workforce Development Board
- South Central Workforce Development Board
- Southern Workforce Development Board
- Tulsa Area Workforce Development Board

**Policy Alignment**

Policy alignment for Oklahoma’s workforce and economic development system is a key, 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. Additionally, the Oklahoma Works Workforce System Partners is an interagency coordinating team that continuously works to ensure policy alignment to create a seamless service delivery experience for all of those that use Oklahoma’s workforce development system.

**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. Currently, a sub-committee of the Workforce System Oversight Committee which includes state and local partners and stakeholders is working toward a system certification process that will ultimately provide a statewide framework and specific outcome standards so that our workforce system will be consistent, aligned and streamlined to find efficiencies and reduce duplication.

Regional and local plans approved in 2017, asked local WDBs to discuss how their regions are building partnerships and processes that incorporate integrated service strategies to better serve their citizens.

Local workforce areas submitted regional plans that provided details on the current levels of alignment and collaboration and how they will be enhanced. The local boards also provided details on their efforts to reduce duplication of services and costs and to leverage resources under a regional service delivery approach.

An example of the state-led resource sharing movement is the pilot project listed below.

**McAlester Infrastructure/Cost Sharing Pilot Project**

The System Oversight Subcommittee reached out to one of the current workforce development areas with the intention of putting together a plan for the state to use for one-stop infrastructure and cost sharing model. The State engaged their board and partnership team to select a pilot one-stop to dissect their overall operating requirements with the intended outcome to be a model for entire state to replicate. The invites also went out to the state partner directors as well as state chief financial officers. This ensured decisions made at the local level were sanctioned and designed with the state’s involvement.

What began as a pilot project in 2012 to create a center certification process, has now been revamped and revived under the new requirements of WIOA. Moving forward, “A New Day, New Way” will focus on Oklahoma Works Center certification with input and guidance from our workforce partners. After Center certification is implemented, “A New Day, New Way” will focus on system-level certification. So, although Oklahoma was on the cutting edge of system certification in WIA, WIOA ensures additional changes are made so that Oklahoma’s Workforce System is comprehensive and responsive to business and job seekers. This Pilot will build on the foundation laid by the original ”A New Day, New Way” initiative.

The McAlester, Oklahoma comprehensive center was selected for the pilot location and information regarding overall cost (i.e., computer related service, freight expenses, telecommunication services, rent and utilities, and office supplies) was made available by the current co-located agencies and partners. i.e. computer related service, freight expenses, telecommunication services, rent and utilities, and office supplies. A team was formed to agree upon formulas for the infrastructure costs and will be up for a vote to approve by all. Some apprehension was noted but the state-level financial representatives in the room reassured their staff all suggested was achievable and forward movement was resumed.

**Accomplishments**

Consensus was reached on non-personnel infrastructure costs by the Jan 1st projected timeline. The partners agreed to a methodology based on occupied square feet by number of full time employees. Costs for infrastructure not included in the primary leaseholders
building lease were also included by taking the cost dividing by the shared space. At this
time negotiations continue on the possibility of cost sharing personnel positions including
the One-Stop Operator, shared resource and reception staff, and Center Managers. Most
partners have statewide interests and each local area agreement impacts the other.
Partners will continue to move forward with dialogue on shared personnel costs but
anticipate it could be next fiscal year before any decisions are made. Valuable lessons were
learned from the pilot in McAlester, including cost sharing agreements amenable to the
partners, as well as the impact local negotiations have on state budgets. These lessons
guided the development of state policy and recommendations given to other areas to reach
local area agreements.

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.
When WIOA was implemented, OAWDB leadership uncovered a disconnect in the culture of
the organization and are in the process of reorganizing their mission and purpose.
In early 2018, GCWED assisted the OAWDB in conducting a Strengths, Weaknesses,
Opportunities, and Threats (SWOT) analysis to assist them with the transition from WIA to
WIOA, and to assist them in strengthening relationships across areas. The SWOT analysis
revealed strength of the entity to build capacity across and within areas, represent diverse
business interests and serve as a coalition of local areas representing the state.
Opportunities for the next few years 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
commitee 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.

**Governor’s Council and Oklahoma Association of Workforce Development Board Chairs Training- 2016; 2017**

The Governor’s Council, in partnership with the Oklahoma Association of Workforce Development Board Chairs, in April 2016 provided initial training for the Local Elected Officials and board members to prepare them for the new local planning regions to explain their role and responsibilities for making this a success for their regional economies.

The consultant was nationally recognized facilitator Mary Ann Lawrence and the one-day session was well attended by board members and local elected official from all over the state with approximately 100 participants. Most of the training was focused on the basics of the new WIOA law and what it would mean for them when the planning regions are fully operational. This session prepared attendees for planning and implementation of Oklahoma local planning regions.

In 2017, the Council and OAWDB partnered again to conduct training for the state and local board on key provisions of WIOA. Recognized facilitator Greg Newton provided skilled training for the boards on alignment and how to maintain high-performing board status. The session was well-received.

**USDOL and Oklahoma Office of Workforce Development Training- 2016**

In partnership with the U.S. Department of Labor (DOL) the Office of Workforce Development hosted an in depth Strategic Board Training at Oklahoma State University - Oklahoma City on May 19, 2016. Titled “Strategic v. Tactical Action for Boards”, Rick Maher, President and CEO, of Maher & Maher spoke and lead the event. The training focused on the important elements of the Workforce Innovation and Opportunity Act (WIOA) and the impact WIOA has on board members’ critical role in the successful expansion and development of the state’s workforce system. The individuals in attendance represented nearly every aspect of the workforce system including: Workforce Development Boards, Local Elected Officials (LEOs), business and industry, core partners, state agencies, and educational institutions.

After an introduction to the essential elements of WIOA and an overview of how those elements would almost certainly change the business operations of entities across the system, participants were asked to consider the vision of a transformed workforce development system. The discussion of a workforce system that has an even greater impact, stronger integration and an even longer term focus provided the mindset for teams to divide and work with regional partners on developing a “plan to plan”. Some of the key topics that resulted from both the initial discussion and regional focus groups include the following: “Proceed until Apprehended!” - WIOA will only be as transformational as state and local leaders allow it to. “Build Strong Partnerships Now.” - WIOA requires partnering on an advance level, early discussion and collaboration will help eliminate issues that may
come about during the phases of implementation. “Don't Reinvent the Wheel.” - Find emerging best practices and bring them to scale for the needs of the state as well as the individuals the state is serving.

The event was considered successful by all parties involved, setting a positive tone for a successful system wide implementation of the Workforce Innovation and Opportunity Act.

2. IMPLEMENTATION OF STATE STRATEGY

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

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

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

Oklahoma has established a work group of stakeholders in the Workforce Development system called the System Oversight Subcommittee to create solutions to barriers and hurdles that were preventing success to the system.

System Oversight Subcommittee

The Oklahoma Works System Oversight Subcommittee, established in 2012, is composed of Oklahoma workforce development system partners, led and established by the Governor’s Council for Workforce and Economic Development Workforce Systems Oversight Committee. A business member of the GCWED System Oversight Committee is the leader of the subcommittee. System partners include: 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. 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.

The team has been a cohesive unit since Governor Fallin recognized 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. This subcommittee was designed to carry out the strategic mission of GCWED and reports to the Workforce System Oversight Committee of that body.

The committee identifies, reviews, and writes policies and processes that align, build, and improve the workforce development system in order to fully implement the objectives outlined in WIOA, 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. Most of the local areas are in the process of building partnerships to accomplish
their version of the utopian system and require guidance from this team; discovering they feel very comfortable requesting assistance from their peers representing their agency. The committee provided oversight in reviewing the Memorandum of Understanding for each workforce area, reviewed and recommended for approval to the Workforce System Oversight Committee the local and regional workforce development plans, participated in guidance of determining infrastructure and shared costs for core and required partners, and is currently outlining the process in determining the monitoring of the one-stop center system. The monitoring process will include a review of financial contributions and processes, engagement of the one-stop partners in the system, and other factors that improve workforce development collaboration and customer focus.

One of the major hurdles they identified was the Memorandum of Understanding at a state and local level addressing service delivery and resource sharing. The WIOA law required partners to work together to build a better workforce development system in Oklahoma. Partners have worked together to make this a win/win for all and keep all stakeholders involved. The WIOA law required we have viable processes in place to address cost and resource sharing and this team established pilots to address infrastructure/cost sharing and have engaged voluntary involvement of State Agency Directors and Chief Financial State Agency Officers.

The WIOA also requires local planning regions to write unified plans. The sub-committee is worked to write a draft guidance for these plans which included input from all the agencies involved.

The benefits are:

- 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
- A maximization of all workforce development resources
- A true competitive advantage for Oklahoma’s economic development efforts
- A pipeline for Oklahoma of appropriately skilled and credentialed workers ready to meet the employment needs of Oklahoma employers

The workforce system being designed will be the springboard to success for Oklahoma’s business and job seekers, helping Oklahoma reach its strategic vision that Oklahoma’s workforce development system increases profitability for businesses and increases income for all Oklahomans.

B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.
Oklahoma enhanced, aligned, and expanded its workforce development activities to address the education and skill needs of the workforce. This has occurred under the state’s and Governor’s broader workforce development initiative, Oklahoma Works, and through the implementation of WIOA. Governor Fallin’s statewide initiative is built upon a coalition of businesses, educational institutions, state agencies, and other partners, and is fully aligned with the federal Workforce Innovation Opportunity Act.

To achieve the overarching goal of wealth generation for all Oklahomans and combat the skills gap, the Office of the Governor, its state workforce partners, and numerous other contributors developed a Strategic Delivery Plan through a statewide strategic planning effort. The effort involved the Core Partners as well as other state agency partners who are a part of the workforce development system. In addition to these workforce system partners, the Oklahoma State Chamber’s Oklahoma Achieves Initiatives, business leaders from all regions of the state, members of our Governor’s Council for Workforce and Economic Development, and our state leaders were involved in the planning process. The resulting Oklahoma Works Strategic Delivery Plan was approved by Governor Fallin and key state leaders. This Plan is the overarching workforce development strategy to guide workforce development activities in the state.

Included in the plan are four objectives and sub-strategies on which all state workforce system partner agencies, including the Core Partners, are aligned.

**Objective 1: ALIGN AND CONNECT**

**Objective 2: DATA**

**Objective 3: PARTNERSHIPS**

**Objective 4: RESOURCES**

In order to achieve the ambitious goals that have been set through Oklahoma Works, the initiative’s full array of workforce partners must align their efforts and take active roles in ensuring that 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 Driver (Aerospace and Defense, Agriculture and Biosciences, Energy, Information and Financial Services, and Transportation and Distribution) and four Complementary Ecosystems (Construction, Health Care, Education, and Creative Industries), as well as the 100 Critical Occupations within these ecosystems (growth and demand occupations). Additionally, Oklahoma Works partners developed a comprehensive asset map, built and maintained by the Delivery Unit within the Office of Management and Enterprise Services, which helps to describes the current set of workforce resources and activities in Oklahoma. Together these foundational pieces tie all partner initiatives together in an aligned, cohesive direction. The map acts as a plan and push to share and maximize state and federal resources in service of the Oklahoma Works goal.

The Core Partners and required and optional one-stop delivery system partners are all 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 (Oklahoma’s 35 Workforce Centers located around the state).

The Governor’s Council for Workforce and Economic Development (GCWED), the WIOA State Board, in alignment with the Oklahoma Works goal, has now been tasked with using data to inform policy, track progress and measure success toward ensuring wealth generation, that are state metrics in addition to federal, WIOA measures. State workforce partners, departments, and agencies impacting career readiness have developed state metrics for targeted wealth generation across Oklahoma. The GCWED selected targets from these metrics, housed on the newly created OKStateStat.OK.gov, that form the foundation of the Governor’s Council Dashboard. This dashboard facilitates the use of data to inform policy, track progress, and measure success consistently statewide.

The Oklahoma Works Strategic Delivery Plan will assist Core program partners with the process to achieve alignment of education and training programs for the purpose of building a talent pipeline of appropriately skilled and credentialed Oklahoman’s to meet the talent demands of Oklahoma employers.

This alignment will serve to create and build a comprehensive workforce development SYSTEM within each region. This system will:

- Create user-friendly, customer-focused service delivery models that will transcend agency programs and silos;
- Provide consistent, high-quality services to employers and job seekers throughout the state;
- Ensure services to employers and job seekers are consistent, while encouraging local and regional adaptation; and
- Create a new normal surrounding stellar customer focus, program alignment and partner collaboration.

Each region’s certified 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

Accomplishments

The Oklahoma Office of Workforce Development (OOWD) provided Oklahoma Workforce Development Issuance (OWDI 07-2017) located at OklahomaWorks.gov as guidance 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. These guidelines:

132. Established minimum criteria for Local Workforce Development Boards (LWDBs) to apply when assessing and certifying one-stop centers in their areas;
133. Provided procedures for LWDBs to evaluate and certify one-stop centers; and,
134. Prescribed timelines for local certification of one-stop centers and for reporting outcomes to the State.

Teams were established in each area to accomplish the task of evaluating each of the comprehensive Oklahoma Works Workforce Centers. This was accomplished within the deadlines set by the policy issuance. Those that had unforeseeable issues developed a timeline for compliance and were certified hinging on the issues being resolved in the monitored timeline dates for completion.

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

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

Oklahoma 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 will 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 on this onset 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. With the elimination of the sequencing of services, staff now have the opportunity to 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 will be achieved by two main processes required by policy set forth in Oklahoma Workforce Development Issuance 04-2016, Local Elected Official (LEO) Consortium Agreement. Policy 04-2016 will require each area’s LEO’s to enter into an agreement; this agreement identifies the responsibilities of the LEO’s 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 in 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 Veteran 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

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

The Partnerships objective of Oklahoma Works aims to cultivate engagement and productive relationships among business leaders in the private sector, Oklahoma’s education and training systems, and other workforce partners, specifically through Key Economic Networks (KENs) within the state. 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. Each KEN region will work to develop and engage strong private sector relationships in order to help ensure that business and industry workforce needs are heard and met. KEN region champions report directly to the Governor’s liaison but also work in conjunction with The Governor’s Council for Workforce and Economic Development and workforce development boards. 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 wealth-generating policies and programs within the workforce system and consistent with the State Plan. 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:

135. Guide the development of a comprehensive and coordinated workforce development system for the state and monitor its operation; and
136. 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, Key Economic Networks, 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, 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, and Microsoft Word and Excel.

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

- Full-time programs are geared to the needs of business & industry. Many result in industry certifications.
- Industry-specific training - Customized short-term training for companies that introduce a new process or product.
- Training for Industry Program - Customized start-up training for wealth generating companies.
- Adult Basic Education and High School Equivalency (HSE).

Vocational Rehabilitation Services at the Oklahoma Department of Rehabilitation Services

- Vocational Rehabilitation and Visual Services 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.
- Local workforce development boards and employment service offices often provide job fairs for laid off employees and veterans which helps local employers who are hiring get seasoned employees.

Local Workforce Development Boards (Seven)

- Work with local employers to understand their workforce needs.
- Training to meet the needs of employers.
Registered Apprenticeships

- The U.S. Department of Labor, Office of Apprenticeship has 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. In 2018, Massachusetts BizWorks will be presenting best practices and coordinating local conversations to strengthen business services in each regional economy.

Similarly, the State is investing in regional sector partnerships by providing competitive sector strategy grants focused on convening local industry groups in support of the state goals of increasing educational attainment and increasing access to work-based learning. These competitive grants will be released in 2018, and will be accompanied with specialized technical assistance to local area recipients, but accessible to all areas.

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

Describe how the State’s Strategies will engage the State’s community colleges and area career and technical education schools, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv).

Strategic Priorities

Oklahoma’s education leaders and training providers are a vital part of the state’s workforce board. The Governor’s Council for Workforce & Economic Development includes the State Superintendent of Public Instruction, Chancellor of the State Regents for Higher Education (2- and 4-year institutions), and the Director of the Oklahoma Department of Career and Technology Education as participants.

Oklahoma’s Strategy for partner engagement with education and training providers includes:

Developing, aligning and connecting the education and training pipeline with the needs of the state’s regional economies by coordinating strategic priorities and plans across the education and workforce system. Oklahoma is aligning and connecting across state agencies, including 2-year, 4-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:

165. Career Pathways: Improving Oklahomans’ exposure to Career Pathways and career options, along with the education and training required for entry into and advancement within a career is necessary in order to increase the number of Oklahomans in the education-to-workforce pipeline and to maximize our precious
state and local resources aligning Career Pathways and career options with the needs of Oklahoma businesses to ensure more Oklahomans are aware of viable paths to career entry and career building, exposed to careers at an earlier age, empowered with the information needed to best use valuable resources, and workforce-ready faster;

166. Postsecondary Attainment and Work-Based Learning: Increasing postsecondary education and training attainment, including: increasing the number of Oklahomans with workforce readiness credentials (employability skills as defined by the Business Roundtable); increasing postsecondary opportunities in high school (e.g. AP courses, concurrent/dual enrollment); exposing students to career options early, increasing access to adult completion programs and work-based learning opportunities (e.g. internships, apprenticeships); and improving access to the supportive services necessary to complete postsecondary education and training (e.g. financial aid, tutoring, advisement). increase postsecondary opportunities in high school to ensure more students graduate high school with specialized knowledge or credentials to enter in-demand occupations, start businesses, or continue education with less time to completion;

Oklahoma’s stakeholders have committed to the following workflow and milestones:

- Agree upon a common definition of Career Pathways and share labor market data with partners related to Critical Occupations
- Identify best-practices within regions and the state regarding career pathways and career readiness programs
- Partner with K-12 education at regional levels for optimum student and educator exposure to existing and future career options and workforce readiness
- Hold state and regional STEM meetings focused on careers in Driver and Complementary ecosystems
- Finalize plan to fill gaps and more effectively align existing programs at the regional and state levels
- Catalog careers and career progression, along with necessary credentials and skills, regionally and within state ecosystems
- Utilize and align available tools such as OKCareerGuide and OKCollegeStart
- Convene regional meetings for education administrators, counselors, teachers, postsecondary institutions, and the business community to discuss models of best practice and credentials and degrees of value in KEN regions
- Carry out strategies identified in the Launch Oklahoma plan
- Conduct extensive outreach, capacity building, and professional development to support implementation of state and regional attainment strategies
- Identify new partnerships to expand work-based learning opportunities
- Create a system for counting statewide work-based learning experiences and monitor annual progress toward achieving work-based learning goal

Accomplishments

All workforce system partners, including the State Department of Career and Technology Education, the State Regents for Higher Education, and the State Department of Education (New Skills for Youth grant), have adopted the WIOA definition of Career Pathways and the
Business Roundtable definition of Employability Skills. All partners are promoting high-demand, Critical Occupations based on labor market data, including the State Regents for Higher Education’s Lumina/SHEEO Adult Promise program which is tied to critical occupations. Workforce and education partners are closely collaborating on the implementation of the Individualized Career and Academic Plan (ICAP) for students beginning in the 8th grade and continuing through to postsecondary education. The Career Pathways Committee of the Governor’s Council for Workforce and Economic Development will be spearheading an effort to produce career lattices in the state’s Title I case management system that are aligned to the state’s Driver and Complementary Ecosystems and Critical Occupations. These lattices will be linked to state education and training institutions.

**Employability Skills**

Improving employability skills, or soft skills needed to enter and succeed in the workforce, was identified by business leaders and educators across the state as another priority issue. By aligning workforce readiness services among state programs and agencies in order to embed employability skills training into existing programs and initiatives, Oklahomans will have the employability skills necessary to start businesses or succeed in wealth-generating occupations. Workflow and milestones include:

- Develop an operational definition of “employability skills” (punctuality, attendance, written and verbal communication, ethics, etc.) necessary for employment and citizenship in partnership with the business community
- Establish best-practices within regions and the state
- Utilize resources developed to determine programs in which employability skills assessment and training can be added

**Accomplishments**

Workforce partners, including education and training institutions are embedding employability skills training into existing program curricula. The Oklahoma Office of Workforce Development, in partnership with a member of the Governor’s Council for Workforce and Economic Development, is collaborating with the Federal Reserve Bank to implement employability skills training, financial literacy and entrepreneurial skills training for frontline staff and regional workforce partners. Key Economic Network (KEN) Champions, or regional business leaders, conducted a survey of Oklahoma businesses to identify the skills currently needed and those that will be needed in the future. This information is shared with education and workforce partners to inform employability skills training needs.

**Key Economic Networks (KEN)**

The Partnership Strategy of Oklahoma Works is to cultivate and maintain productive relationships between regional employers, educators, and other workforce partners to ensure an appropriately skilled workforce. Each KEN is spearheaded by a local business leader, or a KEN Champion. Resources required to effectively achieve this strategy include:

- Private industry
- State Department of Education (K-12)
The goal is to identify and recommend creative, cross-agency, and cross-sector funding models that support similar workforce programs and include agency programs that potentially benefit from public-private partnerships. The strategy will build on Oklahoma’s performance-informed budgeting efforts and encourage agencies to create and/or expand pay-for-performance funding strategies.

Accomplishments

Oklahoma’s Key Economic Network (KEN) Champions have prioritized the goals of increasing internship and apprenticeship opportunities, increasing participation in teacher externship programs, increasing employability skills, and hosting partner engagement events to spearhead efforts to align and connect education and industry to meet regional workforce needs. Through KEN networks, business and industry have informed educators about local well-paying, in-demand career opportunities, and are actively recruiting a diverse group of industries to implement more apprenticeship programs. This year, the number of KEN regions was reduced from nine to seven. This modification was made to reflect the recent change in workforce regions as identified in the state’s unified plan under the Workforce Innovation and Opportunity Act (WIOA). Having Oklahoma’s KEN regions mirror the local workforce development areas will further strengthen the connection between education, training and workforce development activities.

Statewide Education and Training Attainment goal

Governor Mary Fallin established Launch Oklahoma in December 2016 to urgently boost the state’s postsecondary attainment and close the workforce skills gap. Launch Oklahoma is a statewide goal to increase the number of Oklahoma workers with education or training beyond high school to 70 percent by 2025 so that businesses have the current and future talent pipeline they so desperately need. The Oklahoma Works Leadership Team, which included Career and Technology Education, the State Regents for Higher Education (2- and 4-year institutions) and the Oklahoma Office of Workforce Development, was tasked with recommending strategies toward achieving the Launch Oklahoma goal. The recommendations were submitted to the Governor on October 13, 2017, and included strategies to address inequities in postsecondary attainment and assess alignment of degrees, certificates and credentials awarded to high-demand occupations.

The initiative is focused on four strategic objectives designed to address the barriers Oklahomans experience in obtaining workforce credentials, certificates and degrees.

- Increase Awareness: Promote the importance of education and training
- Ensure Access: Students are able to access tuition assistance and supportive services
- Ensure College and Career Readiness: Students are prepared to enter and succeed in education and training
Engage Employers: Employers play an active role in supporting Oklahomans to complete education and training.

To meet the Launch Oklahoma goal, the state is targeting returning adults, adults without any previous postsecondary experience, as well as traditional students. Priorities of the initiative, include:

- Prioritizing education and training programs that lead to employment in Oklahoma’s high-demand industries and occupations;
- Increasing equity in postsecondary education and training attainment, including low-income, rural and minority populations;
- Expanding access to work-based learning opportunities, such as internships and registered apprenticeships; and
- Implementing success strategies that help students stay in education and training programs through completion.

In addition to the statewide goal, regional attainment goals have been established for Oklahoma’s seven Key Economic Network (KEN) regions. The regional goals will serve as the foundation for the work of the KEN Champion, or appointed local business leader, in relation to sector partnership strategies, career pathways development and strengthening relationships between all levels of business and education, including relationships with local and regional community colleges, regional colleges and universities, and career and technology centers.

Work-Based Learning

Oklahoma Works has also 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, including 2-year, 4-year, and career and technology education institutions, are collaborating to implement the policies and infrastructure necessary to support work-based learning strategies like internships, apprenticeships and job shadowing. In November 2017, to further support work-based learning in Oklahoma, Governor Mary Fallin announced a statewide goal, known as Earn and Learn Oklahoma, to increase the number of internships and apprenticeships in the state to 20,000 by the year 2020. In order to meet the 2020 “Earn and Learn” goal, Oklahoma Works has hired two full-time staff who are dedicated to leading statewide apprenticeship and work-based learning strategic planning and implementation.

Accomplishments

In response to legislation recently passed to make work-based learning easier for high school students to access, the State Department of Education established a course code for internships. This allows high school Juniors and Seniors to receive credit for work-based learning beginning in the 2017-2018 school year. Oklahoma Works partners throughout the state are working together to strengthen local education and industry ties in order to increase the number of internship opportunities available to students.

Additionally, the Oklahoma Office of Workforce Development (OOWD) received a $200,000 ApprenticeshipUSA Apprenticeship Accelerator grant from the U.S. Department of Labor in
2016 to expand and diversify apprenticeship opportunities in Oklahoma. Since that time, 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, including internships and apprenticeships. These collaborations are in sectors that did not previously have such opportunities or are in businesses that did not previously offer them.

The main strategy of Oklahoma’s ApprenticeshipUSA Accelerator Grant is to focus on creating and expanding RA opportunities within the state’s wealth-generating ecosystems: Aerospace and Defense; Agriculture and Biosciences; Energy; Information and Financial Services; and Transportation and Distribution, as well as the complementary ecosystems that help to expand wealth in Oklahoma’s economy: Construction, Health Care, and Education.

The inclusion of subject matter experts such as the Oklahoma Department of Career and Technology Education (ODCTE), the Oklahoma Manufacturing Alliance, the Oklahoma Center for the Advancement of Science and Technology and other established Oklahoma Works partners, including established apprenticeship programs, helped the State build upon existing strategies to expand and diversify Registered Apprenticeship (RA) as a viable workforce development strategy in Oklahoma.

Strategies for expansion and diversification also include outreach to specific industry sectors where there is potential for growth in occupations related to Healthcare, Advanced Manufacturing, and Information Technology (IT), as well as to underserved populations such as women, individuals with disabilities, formerly incarcerated individuals, minorities, veterans, and out-of-school youth.

Apprenticeship pilots continue to be a successful strategy for the expansion and diversification of Apprenticeship programs. Since that time, 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, including internships and apprenticeships. These collaborations are in sectors that did not previously have such opportunities or are in businesses that did not previously offer them. One leading example of Oklahoma’s efforts to expand the boundaries of apprenticeship in Oklahoma is the recently created Dell, Inc. apprenticeship. This apprenticeship program was the result of a pilot coordinated with a community college, a charter school, the employer sponsor and Oklahoma Office of Workforce Development. As a part of this work, Dell’s program recruits high school seniors and trains them to work as help desk technicians. This program represents the state’s first information technology apprenticeship as well as its first youth apprenticeship program. Dell recently launched Oklahoma’s first registered youth apprenticeship program for high school seniors working as help desk technicians. Additional RA pilot programs are being planned for the IT industry and healthcare industry.

The State has implemented the use of Apprenticeship Ambassadors and Key Economic Networks (KENs) Champions to promote the RA initiative. Apprenticeship Ambassadors are subject matter experts from existing apprenticeship programs who aid in outreach efforts and provide technical assistance to businesses interested in creating RA programs. KENs are designed to bring together regional business leaders, educators, private organizations, and workforce partner staff to identify solutions to local to local workforce challenges. Each
KEN is led by a business representative selected by the governor, referred to as a KEN Champion.

**Employment Outcomes Digital Workforce Dashboard**

Using workforce and economic development data to inform policy, track progress and measure success is integral to Oklahoma Works. The Workforce and Education Collaborative was formed in 2016 to identify ways to improve information sharing that leads to a stronger, more aligned education and workforce system. The Collaborative works to better understand and improve work-based learning and employment outcomes of Oklahoma’s students. Ongoing analysis of this information leads to data-driven decision making and promotes continuous improvement and accountability among partners.

An Employment Outcomes Digital Workforce Dashboard was recently created by the Oklahoma State Regents for Higher Education (OSRHE) to make frequently requested, workforce-related data more easily accessible to the public. The interactive dashboards summarize employment retention and wages, as well as graduate and enrollment production. The user-friendly dashboards produce customized reports for easy trend analysis.

**F. PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS.**

Describe how the State’s Strategies will engage the State’s other education and training providers, including providers on the state’s eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.

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. Local areas have been instructed to ask their current providers to apply. The intent is to create as many pathways to education as possible for interested student/participants. Eligible training and education providers will confer and 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, and has received an ApprenticeshipUSA Accelerator Grant, which will focus on creating and expanding RA opportunities within the State’s wealth-generating ecosystems: Aerospace and Defense; Agriculture and Biosciences; Energy; Information and Financial Services; and, Transportation and Distribution, as well as the complementary ecosystems which help to expand wealth in Oklahoma’s economy - Construction, Health Care, Education and Creative Industries.

Oklahoma also has exceptional partnerships between the Oklahoma Department of Human Services and both the higher education system and the Oklahoma Department of Career and Technology Education (ODCTE) system, these partnerships provide vocational training and supportive services to adults receiving Temporary Assistance for Needy Families (TANF).

Oklahoma was also recently awarded one of the J.P. Morgan Chase and Cos. New Skills for Youth grants. Outcomes from the Career Readiness Initiative will align 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 grant will help the state assure that 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.

Accomplishments:

Collaborated with the Oklahoma State Department of Education, Oklahoma Department of Career Technology Education, and the Oklahoma State Regents for Higher Education (“OSRHE”) to develop college and career curriculum requirements for a STEM career endorsement. In the past year, the Oklahoma Board of Private Vocational Schools (“OBPVS”) began revising the minimum school licensing standards for private vocational schools to enhance the stability of the for-profit sector, an alternate means to workforce education, especially in the areas of certificates and diploma-level education. The standards strengthened in the area of accountability are beginning to bridge the gap between more
stringent, but voluntary, accreditation standards and the state’s standards. Other legislation was drafted for possible enactment in 2018 to offer greater consumer protection for students. During the year, the OBPVS concentrated efforts on bringing into compliance unlicensed schools, including those reaching Oklahomans online via distance learning education, and having unscrupulous, unlicensed operators cease marketing to Oklahomans.

The US Department of Education recently released data sharing regulations restricting the provision of information to third parties, even at the request of the student. Collaboration with OSRHE’s Financial Aid and Scholarship Division resulted in the development of alternate strategies to verify the total cost of education and training programs, and financial aid from all sources, as reported to the educational facility. OSRHE’s input on a Coordination of Training Funds form will help ensure non-duplication of resources and the provision of WIOA funds in accordance with WIOA 134(c)(3)(B)(i).

G. LEVERAGING RESOURCES TO INCREASE EDUCATIONAL ACCESS

Describe how the State’s strategies will enable the State to leverage other Federal, State, and local investments that have enhanced access to workforce development programs at the above institutions, described in section (E).

The Oklahoma Works initiatives funded by National Governors Associations grants and interagency funding is identifying targeted strategies to keep youth in school and to increase education attainment in groups that have not attained credentials or degrees. Longitudinal data will be collected through new systems which are being created through U.S. Department of Labor and the U.S. Department of Education will provide opportunities to target at risk youth through programmatic or educational improvement. Oklahoma is working through Complete College America programs to achieve greater completion rates, increasing economic opportunities for citizens. The Resources objective will also identify specific avenues for cross-agency solutions. Ultimately, partner agencies will be empowered to reallocate existing resources to provide a greater range of workforce services to Oklahomans. This effort will also examine opportunities to further leverage private investment in programs and services and to implement formal public-private partnerships.

The two strategies identified in III.a.2.E of the plan include the following:

1. Increasing postsecondary opportunities for students still in high school by methods such as:

   o advanced placement (AP) courses and tests which give them college credit,
   o increasing the number of cooperative agreements and concurrent enrollment in in colleges, universities, and technology centers while attending high school, and,
   o competency-based education platforms.

2. Improving workforce readiness—the employability skills needed to enter and succeed in the workforce—was identified by business leaders and educators across the state as another priority issue. By aligning workforce readiness services among state programs and agencies, Oklahomans will have the employability skills necessary to start businesses or succeed in wealth-generating occupations.

Oklahoma Connect and Learn
The Oklahoma Connect and Learn Initiative is a coordinated effort to bring high-speed broadband and digital learning opportunities to schools across the state. As part of this initiative, Oklahoma is partnering with telecommunications service providers and interested school districts to provide affordable fiber optic connections and Wi-Fi access to schools to better facilitate digital learning. A recent report found that 91 percent of Oklahoma school districts now meet the minimum connectivity goal, up from 85 percent in 2015. As part of these efforts, Governor Fallin signed HB 1576 into law in April 2017, which provides current and future teachers with professional development and training in digital and instructional technologies to enhance classroom instruction.

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. The FY16 average hourly rate was $19.64 in Oklahoma according to the Oklahoma Wage Network. 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. 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.

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

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

Skills Gap and Attainment Goal

Oklahoma has a substantial skills gap in its workforce. As we look to the year 2025, the state’s greatest challenge will be increasing the number of students with workforce credentials or associate degrees, as well as increasing the number of college graduates. Current estimates show a 23-point gap between our current workforce and the skilled workforce we will need by 2025. That is why the Governor established a statewide education and training attainment goal through Executive Order in December 2016. Known as Launch Oklahoma, the statewide goal is to increase the number of Oklahomans 25-64 years-old with education and training beyond high school to 70 percent by 2025. To meet the Launch Oklahoma goal, the state will target returning adults, adults without any previous postsecondary experience, as well as traditional students. Priorities of the initiative, include:

- Prioritizing education and training programs that lead to employment in Oklahoma’s high-demand industries and occupations;
Increasing equity in postsecondary education and training attainment, including low-income, rural and minority populations; 
Expanding access to work-based learning opportunities, such as internships and registered apprenticeships; and 
Implementing success strategies that help students stay in education and training programs through completion.

In addition to the statewide goal, regional attainment goals have been established for Oklahoma’s seven Key Economic Network (KEN) regions. The regional goals will serve as the foundation for the work of the KEN Champion, or appointed local business leader, in relation to sector partnership strategies, career pathways development and strengthening relationships between all levels of business and education. Each KEN region will develop local strategies to increase attainment aligned to the local area’s industry needs, as well as to the state’s demand and growth occupations (100 Critical Occupations).

**Complete College America**

Complete College America (CCA) is the most comprehensive and ambitious higher education initiative ever undertaken by the state of Oklahoma. The goal is to increase the number of degrees and certificates earned in Oklahoma by an average of 1,700 per year, from 30,500 annually in 2011 to 50,900 annually by 2023, a 67 percent increase. This must be done to meet the projected need for additional college-educated workers to keep Oklahoma competitive in a global economy.

Oklahoma’s five-point plan to increase degree and certificate completion has led CCA to name Oklahoma the national model for degree completion. Our state plan focuses on promoting college readiness, transforming remediation, strengthening pathways to certificates and degrees, expanding adult degree completion efforts, and rewarding performance and completion.

Significant progress is being made toward these goals. In year one of CCA deployment, our public and private colleges and universities reported 2,945 additional graduates than in the previous year, significantly exceeding our average annual goal of 1,700. This trend continued through the first three years of the program before limited state resources slowed progress in year four. Additionally, in April 2012, the State Regents, with cooperation and input from our college and university presidents, adopted a new approach to make the higher education funding formula a performance-driven model.

Other measures of success continue for Oklahoma’s CCA commitment. The Oklahoma State Regents for Higher Education reviewed and revised its policy on assessment and remediation. These revisions will reform remediation at the collegiate level through 1) multiple assessments to determine readiness for college work so student success is not dependent on one testing event, and 2) through co-requisite models of coursework to augment a student’s progress in college level work with appropriate supplemental instruction to mitigate deficiencies, thus moving the student more expeditiously towards completion.

In addition to remediation reform, Oklahoma as a State System is tackling the issue of math success through the Math Success Task Force. This task force is working to create appropriate math pathways for degree clusters and assisting on statewide scaling of co-
requisites to remediate math deficiencies. From the K-12 side, the Oklahoma State Regents for Higher Education are working collaboratively with the Oklahoma State Department of Education and the Southern Regional Education Board to train K-12 teachers to deliver a 12th grade transitional math course for students who have passed their high school math sequence, yet underperform on national assessments (i.e. ACT or SAT). These efforts will reduce the number of high school students entering college with a math deficiency.

While we have made substantial gains and exceeded these early benchmarks in completions and have implemented other significant reforms, especially in math education, we acknowledge the growing challenges we face in maintaining this significant momentum. Other CCA states have increased their investment in degree completion initiatives, while Oklahoma has repeatedly surpassed our goals on either flat or significantly reduced budgets. Five national foundations are providing multi-year support to Complete College America: the Carnegie Corporation of New York, the Bill and Melinda Gates Foundation, the Ford Foundation, the W.K. Kellogg Foundation and Lumina Foundation for Education.

**Oklahoma Adult Promise Initiative**

Oklahoma was one of four states awarded a three-year Lumina/SHEEO Adult Promise grant to engage adult learners with higher education. The grant focuses on strategies to help adults who have completed some college credit, but have not earned a degree, to return to complete degrees in one of Oklahoma’s 100 Critical Occupations (growth and demand occupations). The program aligns to and supports the state’s Launch Oklahoma education and training attainment goal, and is targeting adult students aged 25-49 years with incomes below $75,000. The Lumina grant funds provide infrastructure and outreach, but no direct dollars to support student tuition or wrap-around, supportive services. All funding to provide tuition, fees, and books to students will come from partners, including:

- Private sector business and industry;
- Workforce Development agencies;
- Native American Education offices;
- Nonprofit entities; and
- Higher education institutions who agree to seek degrees for these occupations.

**Work-Based Learning Initiative**

Oklahoma Works has also 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, including 2-year, 4-year, and career and technology education institutions, are collaborating to implement the policies and infrastructure necessary to support work-based learning strategies like internships, apprenticeships and job shadowing. In November 2017, To further support work-based learning in Oklahoma, Governor Mary Fallin announced a statewide goal, known as Earn and Learn Oklahoma, to increase the number of internships and apprenticeships in the state to 20,000 by the year 2020. In order to meet the 2020 “Earn and Learn” goal, Oklahoma Works has hired two full-time staff who are dedicated to leading statewide apprenticeship and work-based learning strategic planning and implementation.
In response to legislation recently passed to make work-based learning easier for high school students to access, the State Department of Education established a course code for internships. This allows high school Juniors and Seniors to receive credit for work-based learning beginning in the 2017-2018 school year. Oklahoma Works partners throughout the state are working together to strengthen local education and industry ties in order to increase the number of internship opportunities available to students.

Additionally, the Oklahoma Office of Workforce Development (OOWD) received a $200,000 ApprenticeshipUSA Apprenticeship Accelerator grant from the U.S. Department of Labor in 2016 to expand and diversify apprenticeship opportunities in Oklahoma. Since that time, 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, including internships and apprenticeships. These collaborations are in sectors that did not previously have such opportunities or are in businesses that did not previously offer them.

The main strategy of Oklahoma’s ApprenticeshipUSA Accelerator Grant is to focus on creating and expanding RA opportunities within the state’s wealth-generating ecosystems: Aerospace and Defense; Agriculture and Biosciences; Energy; Information and Financial Services; and Transportation and Distribution, as well as the complementary ecosystems that help to expand wealth in Oklahoma’s economy: Construction, Health Care, and Education.

The inclusion of subject matter experts such as the Oklahoma Department of Career and Technology Education (ODCTE), the Oklahoma Manufacturing Alliance, the Oklahoma Center for the Advancement of Science and Technology and other established Oklahoma Works partners, including established apprenticeship programs, helped the State build upon existing strategies to expand and diversify Registered Apprenticeship (RA) as a viable workforce development strategy in Oklahoma.

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I. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES.

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

Oklahoma recognizes that workforce development must be linked to economic development. That link is 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 assists in Layoff Aversion and Rapid Response efforts, assist in supporting our Key Economic Network Champions (business leaders), and help promote the resources and services available through WIOA Core Partner agencies and the Oklahoma Works Initiative Workforce System Partners. 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**

At the state level, The Oklahoma Department of Commerce is the state’s lead economic development entity and a participant of the Governor’s Council on Workforce and Economic Development. The work of the Council is driven, in part, by data and business intelligence provided by the Department of Commerce. The Department of Commerce, the OOWD and other state level workforce partners attend monthly meetings at which economic development issues can be discussed in the light of workforce needs.

**Key Economic Networks**

At the regional level the nine Key Economic Networks (KENs), led by business champions in the area, help lead the Workforce system in creating a system that is responsive to the needs of business and industry. These KEN Champions frequently partner with local and regional chambers of commerce to develop career pathways initiatives and increase
education and training attainment linked to demand and growth occupations in the area. In addition, local economic development professionals serve on the Workforce Development Boards, assuring that economic development issues/needs are considered as decisions are made.

**Statewide Career Exposure Week**

Oklahoma Works hosted the first statewide Career Exposure Week November 13-17, 2017. The week-long event connected local students with area businesses to give our future talent the opportunity to explore the possibilities in Oklahoma that await them. Nearly 50 events 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. 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:

- 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 KEN 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.

Economic development organizations were among the partners who helped make this event successful, including organizations like the Tulsa Chamber, and the Duncan Area Economic Development Foundation. Oklahoma will continue to 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.

**STEM Workshops and Summits**

STEM occupations are included among many of Oklahoma’s 100 Critical Occupations (growth and demand occupations) and are closely tied to the economic development of both the state and regional economies. To align efforts within the state, Oklahoma’s workforce system partners collaborate regularly to promote STEM careers, as well as the education and training necessary for STEM fields.

**Regional STEM Workshops 2016**

Oklahoma Works held two regional STEM Workshops in September 2016 in Lawton and Stillwater. The purpose of the STEM Workshops was to help communities build on local programs to better align science, technology, engineering and mathematics (STEM) education with in-demand jobs. The STEM Workshops served as a foundation for
community participation at the Governor's STEM Summit which took place in November 2016.

**Governor's STEM Summit 2016**

The purpose of this statewide summit was to bring together Oklahoma business leaders, educators and other key stakeholders focused on the critical importance of science, technology, engineering and mathematics throughout our state and take further action on the ideas discussed at the STEM Workshops held in September 2016. The annual STEM Summit event is a collaboration with the Oklahoma State Regents for Higher Education (OSRHE), which brings the need for Science, Technology, Engineering, and Mathematics (STEM) to the forefront for business and industry leaders, higher education, technology centers, and K-12 schools. As a result of the OSRHE focus on STEM, OSRHE has shown increased production of STEM majors in Oklahoma over the past several years.

**Governor's STEM & Entrepreneurship Summit 2017**

The 2017 STEM and Entrepreneurship Summit was held in November 2017. For the first time, the event brought together business and education leaders to focus on the intersection of entrepreneurship, apprenticeship and STEM education in Oklahoma communities.

**Data-Driven Decision Making**

Using workforce and economic development data to inform policy, track progress and measure success is integral to Oklahoma Works. The Workforce and Education Collaborative was formed in 2016 to identify ways to improve information sharing that leads to a stronger, more aligned education and workforce system. The Collaborative works to better understand and improve work-based learning and employment outcomes of Oklahoma’s students. Ongoing analysis of this information leads to data-driven decision making and promotes continuous improvement and accountability among partners.

**Employment Outcomes Digital Workforce Dashboard**

An Employment Outcomes Digital Workforce Dashboard was recently created by the Oklahoma State Regents for Higher Education (OSRHE) to make frequently requested, workforce-related data more easily accessible to the public. The interactive dashboards summarize employment retention and wages, as well as graduate and enrollment production. The user-friendly dashboards produce customized reports for easy trend analysis.

**Transportation Services**

Public transportation is a vital component in economic development and workforce development. A statewide asset map and layered route maps of existing public transit routes were developed to understand the current resources available to Oklahomans traveling to work, school and training. Gaps were identified in relation to the location of large employers and regional education and training institutions. As part of a pilot initiative, Oklahoma Works is currently collecting data from Oklahoma adults who are not currently attending postsecondary education to determine to what extent transportation has played a role in non-completion.
Leveraging a partnership with the Governor’s Oklahoma United We Ride Council initiative, Oklahoma Works is also collaborating to make recommendations to the Governor regarding improvements necessary to increase access to, as well as the availability and quality of, transportation services; future outreach efforts are anticipated in an effort to introduce all partners to MyRide, an internet application of statewide transportation resources.

**Oklahoma Works State Summit**

Oklahoma Works hosted a statewide Summit in October 2016. The purpose of this statewide summit was to provide an update on progress of the Oklahoma Works Initiative, share best practices, promote regional partnerships and build on the momentum developed over the past year of work.

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**B. STATE OPERATING SYSTEMS AND POLICIES**

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

1. **THE STATE OPERATING SYSTEMS THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE’S STRATEGIES. THIS MUST INCLUDE A DESCRIPTION OF—**

**A. STATE OPERATING SYSTEMS THAT SUPPORT COORDINATED IMPLEMENTATION OF STATE STRATEGIES**

*(e.g., LABOR MARKET INFORMATION SYSTEMS, DATA SYSTEMS, COMMUNICATION SYSTEMS, CASE-MANAGEMENT SYSTEMS, JOB BANKS, ETC.)*

Oklahoma uses OKJobMatch.com, operated by AJLA, and procured by competitive bid in 2017, 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. AJLA coordinates case management for programs operated by OESC and OOWD 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. Starting July 1, 2017 OKDRS began collecting data required for the new
performance accountability indicators to the U.S. Department of Education, Rehabilitation Services Administration (RSA).

The OklahomaWorks.gov website, was relaunched in the fall of 2017 and serves as the comprehensive platform for many of Oklahoma’s workforce development activities. It is also fully accessible to our wide range of partners. OK-WDES will consist of a multi-agency data repository that will house workforce- and education-related data to provide a platform for linking data across data-generating agencies necessary to improve data collection and dissemination, and to inform and support the objectives of Oklahoma Works. OK-WDES has been partially funded by a Workforce Data Quality Initiative (WDQI) grant, and will be developed as further funds are secured for the project. Our electronic data systems are under development to ensure they are responsive, accurate, and compliant. We will continue to pursue available strategies as guidance is issued.

Accomplishment

Both the website revamp and labor exchange system were in RFP status. Both items were procured and fully implemented by the end of 2017.

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.

New City: Web Design & Marketing Company, worked with OOWD to overhaul OklahomaWorks.gov through much of early 2017, with the new website launching in September 2017. The new site is fully accessible and includes more interactive features like labor market data visualization and apprenticeship location mapping.

B. DATA-COLLECTION AND REPORTING PROCESSES USED FOR ALL PROGRAMS AND ACTIVITIES, INCLUDING THOSE PRESENT IN ONE-STOP CENTERS*

Objective 2 of the Oklahoma Works Strategic Delivery Plan is to integrate and utilize workforce and economic development data to inform policy, track progress, and measure success. The written plan, approved by the Governor, formally engaged Workforce System Agency Partners from the State Regents for Higher Education, the State Department of Education, the Oklahoma Department of Career and Technology Education, and OMES. 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.

Currently, workforce programs including Wagner-Peyser and the WIOA Title I Youth, Adult, and Dislocated Worker Programs 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 ReportLink is utilized to verify the data and verify any errors present within the PIRL files, once errors are corrected and data is verified the files are then uploaded 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 case managers to easily set baselines, track program progress, student goals, and deliver results and streamline data reporting to state and federal agencies. OCDTE anticipates that data reporting can be made available to the local boards in the future 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. Starting July 1, 2017 OKDRS began collecting data required for the new performance accountability indicators to the U.S. Department of Education, Rehabilitation Services Administration (RSA). The first quarterly report for Program Year 2017 was made November 15, 2017 and OKDRS anticipate the frequency of data reporting to the local boards occurring on a quarterly basis.

* For the PY 2016 state plan, descriptions of data collection and reporting processes need only include currently known indicators.

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.

The state operating systems across core partner programs are intended to provide coordinated, comprehensive services and access to resources that will support the implementation of state strategies that:

- Provide workforce solutions to grow and develop an educated and skilled workforce that attract and support a strong and vibrant economy;
- Promote a customer-centered delivery system for businesses/industry, jobseekers and youth that provide access to training and employment opportunities; and
- Produce strong partnerships that support regional economies based on data-driven decisions and focus on continuous improvement and evaluation.

As the state continues its implementation strategies for WIOA, stakeholders will work towards identifying co-location and case management strategies to create efficiencies that will support and help manage a shared client base, avoid duplication of services and leverage resources. The following information describes data management systems currently used by core partners.

**Title I**

OKJobMatch is an integrated, vendor hosted management information 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.

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 requirement. 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.

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).

Oklahoma is implementing a common intake process to better identify the needs of individuals in order to improve access and service to participants. The focus is on coordinating services across partner programs, optimizing the use of resources, and preventing the duplication of services while supporting the Oklahoma Works goal of increasing the skills necessary to obtain employment. Co-enrollment of participants is utilized when the individual will benefit from the services provided from multiple programs. Integrated service delivery was implemented to improve access to quality services through service and program integration, support the linkages between workforce programs and economic development by developing shared goals and emphases, implement the intent of the Governor’s Council and the State Strategic Plan for comprehensive workforce system integration, provide a framework to empower and support the Workforce Development Board’s integration of Wagner-Peyser and WIOA Title I Adult program operations at the local level, and reduce duplication and seek efficiencies in a time of limited resources. Common exit is utilized with the WIOA Title I Adult, Dislocated Workers, Youth, Labor Exchange, and Trade Act programs.

**Title II**

The CareerTech Information Management System (CTIMS) is a new web-based comprehensive information management system developed to serve Adult Basic Education grant recipients, Carl Perkins recipients, TANF HSE grant recipients, Comprehensive Schools, Technology Centers, and Economic Development Initiatives. The system allows for the electronic submission of grant applications, budget approvals, invoice processing, enrollment input, and CTE instructional program approvals. The system provides access to over 2,600 educational personnel across the state of Oklahoma in order to serve the various CTE initiatives that support students, economic development, and business and industry in Oklahoma.

LACES NexGen (Literacy, Adult, and Community Education System) is an online student data management software designed for providers of Adult Basic Education (ABE), volunteer literacy, and correctional education. With LACES NexGen, we are able to track everyone associated with our ABE/HSE/ESL programs, including students, classes, and staff. It collects all NRS-related data and generates required and optional NRS tables. LACES
NexGen also tracks outcome measures such as educational gains, goal achievement, cohort outcomes, demographic information, and attendance hours, so we can monitor how our program is performing over time.

LACES NexGen is NRS and OCTAE compliant, and NRS and OCTAE requirements are built into the software, which includes specific required fields and automatic population of cohorts. The software is updated when the NRS and OCTAE makes changes to the way students are tracked and reported for funding purposes.

**Title III**

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.

**Title IV**

The AWARE Case Management System is an Electronic Records Managements software used by the Oklahoma Department of Rehabilitation Services, to track services provided to individuals served by the Oklahoma Department of Rehabilitation Services under the State/Federal Vocational Rehabilitation and the Older Blind Independent Living programs.

The AWARE system is an internet-based system that is accessed by a web browser on a secure network. All data elements necessary for Federal and State reporting are captured and it automates all U.S. Department of Education, Office of Rehabilitative Services,
Rehabilitation Services Administration mandated reports. In addition, it maintains high accessibility standards (508 compliant) to accommodate staff who are blind (screen readers), low vision (optimized fonts and background displays) or unable to use a computer keyboard or mouse in a normal way (i.e. voice recognition systems).

Alliance Enterprises, Inc. the owners of the AWARE system, prioritizes its customers’ ability to provide accurate and timely Federal reporting and it provides customized options to meet each state’s needs. The data produced by the system is stored in an industry standard Microsoft Sequel Server database for each of reporting, analysis and data sharing through security data connections. Alliance also works closely with its state customers to insure it meets policy and business practice standards required by the state. In Oklahoma’s case Alliance customized AWARE to handle a financial system tied to the PeopleSoft system, the State Treasurer’s office, and Third Party Administrators who process Medical/Pharmacy claims via data imports and exports.

**Data collection and Reporting Processes:**

The workforce system partners are utilizing the Oklahoma Works, Key Objective: Data, to integrate and use workforce and economic development data to inform policy, track progress, and measure success. Under this objective, Workforce Partners have identified the “Common Connectivity” strategy in the form of a common intake portal as a priority for the state. Oklahoma looks forward to joint guidance from the US Department of Labor and US Department of Education on joint performance reporting requirements that influence common intake processes, procedures, and common data elements.

Oklahoma was awarded a $1,100,000 Reemployment and System Integration Dislocated Worker Grant (RSI-DWG) to support high quality service delivery and improve employment outcomes for dislocated workers, including those who are also unemployment insurance claimants or long-term unemployed, through investment in integrated technology solutions that support connectivity across programs and services provided to dislocated workers.

Utilizing this grant, Oklahoma is undertaking a project whose core elements are the implementation of robust on-line service delivery hubs that integrate information and on-line services across at least the Dislocated Worker (DW), Employment Services (ES), and the Unemployment Insurance (UI) programs; and data integration strategies that support the ability of front-line staff, including career counselors, to better connect dislocated workers to the services they need to get jobs in demand along career pathways and expand the capacity to provide career counseling to more customers.

The Oklahoma Office of Workforce Development (OOWD) is currently working with America’s JobLink Alliance (AJLA), the system procured in 2017, on system upgrades to OKJobMatch.com, the State’s virtual case management system, in response to the deliverables described in OOWD’s scope of work for the Reemployment and System Integration Dislocated Worker Grant (RSI-DWG).

Expected outcomes of RSI-DWG funds received by OOWD outlined in the scope of work include improved service delivery and employment outcomes for dislocated workers; more effective connections to all available services through common case management; prevention of long-term unemployment, increased early intervention and layoff aversion; increased accessibility to services through automation and self-service; and enhanced identification of service delivery needs.
State policies supporting state strategy implementation:

All Oklahoma Works workforce system policies will support the alignment of service delivery and focus on increasing the wealth of all Oklahomans. Policy development and process is a collaborative approach, utilizing the System Oversight Subcommittee (SOS) members who draft and revise policy. The Workforce System Oversight Committee (WSOC) reviews all policy upon release.

For example, under guidance of the WSOC and SOS, a pilots in a local area is occurring with regards to infrastructure cost sharing and contributions. From this pilot Oklahoma anticipates retrieving best practices and lessons learned to distribute to other regions and local areas undergoing the same negotiations. SOS used these lessons learned to draft policy for the system. The guidance was accompanied with technical assistance by the Oklahoma Office of Workforce Development and our system partners represented on the System Oversight Subcommittee.

In 2017 the Oklahoma Office of Workforce Development issued OWDI 24-2017 and OWDI 24-2017, Change 1. This issuance 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 and 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 the all parties strive to continue improving the system.

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. STATE AGENCY ORGANIZATION

Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.
The Oklahoma Office of Workforce Development (OOWD), housed at Oklahoma State University-Oklahoma City (OSU-OKC), guides the workforce development system in Oklahoma. There are four core programs in Oklahoma. The OOWD/OSU-OKC 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 Governor's Council 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 seven 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 for State, Education and Workforce Development. A Deputy Secretary for Workforce Development and an Executive Director direct 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.

The Oklahoma Works Agency System Partners team, originally established under the authority of an Executive Order, is an interagency team comprised of executive level staff from workforce, education and economic development agencies of the state for the purpose of providing staff support to the Governor's Council and to create efficiencies, eliminate duplication, and eliminate barriers to jointly providing a service delivery system. The Workforce Partners team works closely with the Governor, Cabinet Secretary and the Workforce Development office and assists the Governor's Council.

The Oklahoma Office of Workforce Development and its Workforce Partners work in conjunction with the Governor's Oklahoma Works initiative. Oklahoma Works is an initiative designed to increase the wealth of all Oklahomans through providing education and training for citizens to obtain quality employment. The rationale is that coordinating strategic priorities and plans across education, training, and industry will increase the
wealth of all Oklahomans by providing employment opportunities for workers and ready availability of highly skilled talent for business and industry. The initiative is built upon a coalition of businesses, educational institutions, state agencies, and other partners.

The goal of Oklahoma Works is to implement wealth-generating policies across the state through the alignment of private and public strategic priorities, helping all Oklahomans to achieve the American Dream. To accomplish the overarching goal of wealth generation for all Oklahomans and combat the skills gap, the Office of the Governor, State Workforce Partners, private business leaders, and numerous other contributors created this plan. Listed below are the four objectives of Oklahoma Works and organization chart. The objectives seek to provide necessary support while removing education and workforce barriers impacting the citizens of Oklahoma.

![Oklahoma Employment Security Commission Organizational Chart](image)

![Oklahoma Department of Rehabilitation Services](image)

![Oklahoma Department of Career and Technology Education](image)

### B. STATE BOARD

Provide a description of the State Board, including—

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 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 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) an 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 key industry sectors. These sectors, or ecosystems, include high-growth clusters statewide. There are five main ecosystems 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. Those committees are: Workforce System Oversight Committee, Youth Program Committee, Career Pathways Committee, and Healthcare Workforce Committee. Recommendations are taken to the full Council for action.

**Leadership**

The chair (appointed by the Governor) of the Governor’s Council was Steve Hendrickson, The Boeing Company, from 2004 - 2017. In October 2017, Mr. Hendrickson retired from the Council. The vice chair, Nathaniel Harding, President of Antioch Energy, moved into the chair position at that time. At the January 2018 Governor’s Council meeting, a new vice chair was voted in, John Hawkins, Owner of Integrated Insurance Services.

Another leadership change took place in December 2017. The Secretary of Education and Workforce Development, Natalie Shirley, who was also President of Oklahoma State University-Oklahoma City, resigned from her position as Secretary and President to take another position. The Governor added to the current Secretary of State, Dave Lopez, the additional responsibilities of Education and Workforce Development. Effective January 2018, his new title became Secretary of State, Education and Workforce Development. Secretary Lopez has previous experience with the Oklahoma Office of Workforce Development and the Governor’s Council as he had oversight of them as the Secretary of Commerce at the Oklahoma Department of Commerce when they resided there.

The Governor’s Council is staffed by the Oklahoma Office of Workforce Development (OOWD). OOWD also staffs the Workforce System Oversight Committee, the Career Pathways Committee, and the Youth Programs Committee. The Department of Health staffs the Healthcare Workforce Committee.

**Governor’s Council Standing Committees**

**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.
- Work with regional planning areas to develop planning documents.

**Action Items**

- Coordinate and ensure support at the local and state level to the Oklahoma Works 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.

**Accomplishments** The Governors Council released the following policies consistent with WIOA:

**Local Area Initial Designation Process**, which provides guidance and the process for the initial designation of Workforce Development Areas in Oklahoma, along with the process for appealing designation decisions;

**Youth Program Policy**, which provides guidance on the changes to expenditure requirements, eligibility and program elements under WIOA to the Title I Youth Program with a focus on out of school youth;

**Conditional Designation Policy**, which provides guidance to current local workforce areas that did not meet the qualifications for initial designation;
Local Elected Official (LEO) Consortium Agreement, which provides guidance relating to the LEOs WIOA to ensure that the necessary regulatory and operational elements are described, included and understood of LEO roles and responsibilities;

Process for identification of Workforce Planning Regions, which provides guidance and the process for the identification of Workforce Planning Regions in Oklahoma;

Transfer of Formula Funds Policy, which provides procedures and guidelines for the transfer of funds between the Title I Adult and Dislocated Worker Programs of WIOA;

Regional and Local Planning Instructions, which communicates Oklahoma’s instructions for the local and regional plans under WIOA;

process for Local Area Redesignation within a Region, Consolidation, and/or Creation of a New Local Board, which provides guidance for local workforce development boards intending to redesignate within a region, consolidate, and/or become a new workforce area under WIOA;

Oklahoma Works One-Stop Operator Procurement Instructions, which provides guidance for the procurement and selection of the local Oklahoma Works One-Stop Operator under WIOA;

Poverty Guidelines and LLSIL, which updates poverty guidelines that may be used to calculate income levels to determine eligibility for participation in various state and federally funded programs and to prioritize services when funding is limited;

Local Workforce Development Board Two-Year Certification Process, which provides guidance for the Local Workforce Development Board two-year certification process;

Memorandum of Understanding Guidance and MOU Toolkit, under the Workforce Innovation and Opportunity Act of 2014 (WIOA), PHASE I, which provides guidance for the local development and execution of Phase I of a Memorandum of Understanding (MOU) with all of the required partners;

Center Certification policy, which provides guidance 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;

Data Integrity policy which provides guidance 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 into OKJobMatch;

WIOA Core Performance Measures which provides guidance 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;

Fiscal Requirements, Procurement, and Contracting which provides guidance to communicate the State policy concerning fiscal requirements, procurement, and contracting to ensure that purchases are economical and efficient, and are in compliance with applicable laws and regulations;
Governor’s Oversight and Monitoring Plan, which communicates 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 and also details the Governor’s standards for local oversight and monitoring;

Adult and Dislocated Worker 40% Minimum Training Expenditure Rate, which provides guidance for the required 40% minimum training expenditure rate of Title I Adult and Dislocated Worker funds for each program year, beginning in 2017;

Rapid Response Activities and Layoff Aversion, which provides guidance 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;

The Eligible Training Provider List, which provides guidance to communicate Oklahoma’s process and procedures regarding the Eligible Training Provider List (ETPL) and the eligibility of training providers to receive WIOA funds for the provision of training services to adults, dislocated workers, and out-of-school youth aged 16 - 24;

Limited English Language Proficiency (LEP) which provides guidance to communicate Oklahoma’s process and procedures regarding the prohibition against national origin discrimination as it affects persons with Limited English Proficiency (LEP) and applies to Local Workforce Development Boards (LWDBs) and other WIOA Title I grant recipients;

Performance Negotiation policy, which provides the 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;

Adult and Dislocated Worker Programs, which provides guidance to the workforce system on delivering services under the WIOA Title I Adult and Dislocated Worker programs and individuals served by the Wagner-Peyser Act Employment Service (ES) program, as amended by WIOA Title III, under the WIOA Final Rule, Common Identifier policy, which provides guidance to communicate Oklahoma’s common identifier, consistent with the law and regulations. The State elected to use the identifier: Oklahoma Works a Proud Partner of the American Job Center Network;

Oklahoma Data Validation and Source Documentation Requirements Policy, which provides 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;

Transitional Jobs policy, which provides guidance to the workforce system on developing Transitional Jobs as a workforce strategy within WIOA Title I Adult and Dislocated Worker programs; Conflict of Interest policy, which provides guidance to the workforce system to ensure that WIOA Title I workforce development activities are conducted in a manner to prevent conflict of interest;

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, which provides guidance on
the operating costs of the one-stop delivery system, which are comprised of infrastructure costs and additional costs;

**Nondiscrimination and Equal Opportunity**, which provides guidance to communicate Oklahoma’s process and procedures regarding nondiscrimination and equal opportunity procedures that apply to all Local Workforce Development Areas (LWDBs);

**WIOA Section 188 Discrimination Complaint Procedures Governing WIOA Activities and Oklahoma Works (One-Stop) Center Activities**, which provides guidance on the WIOA Section 188 Discrimination Complaint Procedures;

**Supplemental Wage Information Collection**, which provides guidance for the use of supplemental wage information, when appropriate, to assist in carrying out the performance accountability requirements under section 116 for the WIOA Title I Programs and the Wagner-Peyser Employment Services as amended by Title III;

**WIOA Roles and Responsibilities**, which provides guidance to communicate the roles and responsibilities of various entities created as a result of WIOA;

**WIOA Worksite Agreement**, which provides guidance on the utilization of the standardized Worksite Agreement for all participants in Adult, Dislocated Worker, and Youth work experience programs, including transitional jobs for Adult or Dislocated Worker program participants; and, **Grievance and Complaint Process**, which provides guidance to communicate Oklahoma’s instructions for the grievance and complaint process under WIOA.

**Youth Program Committee**

**Purpose (According to the Governor’s Council Bylaws)**

Provide recommendations on policy and performance for the development and implementation of WIOA youth funded programs statewide. Create an Oklahoma workforce strategy for youth that aligns with youth initiatives and provides common solutions that coordinate with the state’s economic goals building wealth creation for all Oklahomans.

**Goals/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.

**Action Items**

- Work with the education system to support the prevention and recovery of affected youth.
- Develop prevention and recovery strategies for both in-school and out-of-school youth.
- Develop a statewide plan in support of youth which would include a communication infrastructure that will inform and engage all stakeholders.
- Provide guidance to assist local areas in achieving compliance.

**Accomplishments**

The Youth Programs Committee has refocused its mission which would include prevention, concentrating on in-school youth and recovery, addressing the out of school youth. In realizing the different youth categories, the Youth Programs Committee created four subcommittee to address these issues. They include the Individual Career and Academic Plan (ICAP) Committee, the Character Committee, the Workforce and Career Ready Committee, and the High School Equivalency Committee. Each committee was tasked with determining strategic objectives and implementing those objectives. The ICAP Committee is focused on actively engaging students to enable them to understand their own interests, strengths, values, and learning style; create a vision for their future; develop individual goals; and prepare a personal plan for achieving their vision and goals. The Character Committee is working to encourage grade schools to improve employability skills by implementing Eleven Principles for Effective Character Education from Character.org and encourage schools to apply for State School of Character recognition. This recognition includes assessing schools on their school culture, making improvements, and measuring results. The High School Equivalency Committee is focused on increasing the number of adult learners, fostering a system that supports an increase in the self-confidence and motivation of adult learning, increase public awareness of adult education learners and their barriers and challenges, fostering a system that provides a relatively easy transition from education to employment, and increasing the opportunities for incarcerated individuals to receive their high school equivalency. The High School Equivalency subcommittee has subsequently been moved to the Career Pathways Committee to align more with adult education and business and industry. A Dropout Recovery Committee will replace the HSE committee and determine objectives that will assist in reducing high school dropouts in Oklahoma.

**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**

- By October 2016, statewide health workforce efforts are being coordinated through a single, centralized entity.
- By January 2016, 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.
- By October 2019, strategies are in place to reduce identified supply gaps for 20 critical health occupations.
- By November 2019, 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.

**Accomplishments**

The Health Workforce Subcommittee (HWS) is working toward a coordinated state approach for health workforce training, recruitment, and retention to ensure the state has a well-trained, adequately distributed, and flexible health workforce to meet the needs of the healthcare system. During the past year, the HWS has furthered this mission through the development of evidence-based recommendations to sustain and support funding of the Physician Manpower Training Commission which provides scholarship programs for physicians, nurses, and other health care providers. In addition, the HWS has aligned efforts in order to enhance the talent pipeline for health care occupations identified on the state’s list of critical occupations. Work includes development of recommendations for aligning workforce development programs funded by the Oklahoma Health Care Authority with Oklahoma’s list of critical occupations. The HWS has also developed an in-depth report of workforce data for the health care occupations identified as critical in order to develop robust strategies to identify supply and skills gaps in order to improve and enhance the health care talent pipeline in Oklahoma. Finally, the HWS developed a research-based proposal for a Community Health Worker (CHW) certification process. This post-secondary certification would formalize the CHW profession in the state and establish a strong rung in the career ladder for nursing and other health care professions identified on the state’s list of critical occupations.

**Career Pathways Committee**

**Purpose** *(According to the Governor’s Council Bylaws)*

Make recommendations, inform, coordinate and facilitate 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. Develop industry sector strategies in state and regional ecosystems to ensure that the education and training system is delivering the skills needed by employers.

**Goals/Objectives**

- Create a plan for Career Pathways efforts to be based on industry sectors within Oklahoma’s state and regional ecosystems.
- Establish 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.

- Create and use Career Pathways approaches to increase the proportion of low-skill learners who ultimately earn a degree or certificate.
- Increase high school graduation rates - decrease high school dropout rates.
- Increase the percentage of Oklahoma workers with a recognized postsecondary credential. (A credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State or Federal government, or an associate or baccalaureate degree.
- Reinforce the alignment with Registered Apprenticeship for earn-and-learn opportunities.
- Use performance data to demonstrate progress and impact, thereby supporting partner buy-in and reinforcing continued engagement over time.
- Make Career Pathways part of the Board certification process.
- Introduce employers and educators to the value of partnering by describing best practices and success stories.
- Develop or research pilots and models.

**ACTION ITEMS**

- Based on regional ecosystem industries and workforce and economic development data, identify skill gaps in specific occupations.
- Work with education and training partners to adopt or align curriculum in programs to meet needs of employers.
- Create awareness with business and industry, educators, local and regional leaders, KENs, community, students and parents to develop understanding and importance of career plans and career pathways.
- Explore and promote work-based learning opportunities (e.g., workplace simulations, school-based enterprises, cooperative work and study programs, internships (paid or unpaid), on-the-job training (OJT), job shadowing, apprenticeships, fellowships, short-term employment, and other paid or unpaid work experiences).
- Explore promising strategies that have been working for others and might be easily replicable.
- Hold regional summits or meetings on Career Pathways and Sector Strategies.
- Develop a Career Pathway pilot in each region of the state.

**Accomplishments**

- Adopted bylaws to develop a talent pipeline that helps employers fill critical skills gaps, with a particular focus on WIOA special populations.
- Support Key Economic Network (KEN) Champions, or regional networks spearheaded by a business leader, in their efforts to build and strengthen career pathways aligned to the state Driver and Complementary Ecosystems and Critical Occupations.
- Established subcommittees focused on: implementing strategies to increase the number of Oklahomans with a high school equivalency; identify trends in industries
and anticipate future workforce skill needs based on changing industries; implement strategies to expand work-based learning opportunities to enter and continue along a career pathway; and engage industry associations/employers in support of education and training attainment strategies, teacher externships, and sector partnerships.

- Coordinating and supporting training and technical assistance to partners related to career pathways and sector partnerships.
- Committee membership includes WIOA Core Partner agencies, as well as broader partners, including education and training, business leaders, representatives from the local workforce areas and boards, and other community partners.

### I. MEMBERSHIP ROSTER

Provide a membership roster for the State Board, including members’ organizational affiliations.

A list of the members of the Governor’s Council for Workforce and Economic Development are listed in the chart below. Membership is in compliance with WIOA Section 101 (b) Membership.

Membership consists of 25 total members:

- 13 Business/Private Sector
- 2 Labor Representatives
- 1 Apprenticeship Representative
- 2 CBO/Non-Profit
- 2 Elected Officials
- 1 Governor
- 4 Core Partners/Public
- Representation from all four Oklahoma Planning Regions
- Representation from urban, suburban and rural areas in the state

Ex-officio, non-voting, members of the Council represent the following state agencies:

- Native American Liaison-Office of the Governor
- OK Dept. of Commerce
- OK Dept. of Corrections
- OK Dept. of Health and Human Services
- OK Dept. of Mental Health & Substance Abuse Services
- OK Health Care Authority
- OK State Dept. of Education
- OK State Dept. of Health
- OK State Regents for Higher Education

*Oklahoma Legislators are not included on the Governor’s Council, as it is not allowable by Oklahoma Statute.*
II. BOARD ACTIVITIES

Provide a description of the activities that will assist State Board members and staff in carrying out State Board functions effectively.

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 uses the Workforce Partners Team, committees and work groups to facilitate an aggressive agenda that focuses resources from Oklahoma’s employment, education, and economic development communities to secure statewide economic growth.

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 also through the Workforce 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.

**Timelines and Progress on Activities**

- September 2015: All required State Board members were appointed.
- November 6, 2015: First WIOA compliant State Board meeting
- November - January: State Board New Member Orientations Conducted
- March 24, 2016: State Board and the Governor identified four Planning Regions for State
- April 29, 2016: New Bylaws for the Governor’s Council approved
- October, 2017: State Board Members with Expiring Terms were Re-appointed or Replaced
- October 27, 2017: New chair, Nathaniel Harding, was approved replacing outgoing chair, Steve Hendrickson
- January 12, 2018: State Board New Member Orientation Conducted
- January 26, 2018: A new vice-chair was approved, John Hawkins, replacing Nathaniel Harding who moved into the chair position

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

**A. ASSESSMENT OF CORE PROGRAMS**

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

A consideration for each of the core programs will be the delivery of quality, customer service oriented, and effective programs driven by continuous improvement principles.

Once the baselines for all of the core programs has been determined with the US Departments of Labor and Education, each of the core programs whether state or locally based will be expected to invest their program funds in a manner that both meets the intent of their funding streams and targets the required performance.

The WIOA local workforce programs and more recently the Wagner Peyser program have been operating under a variation of the new performance measures under previous iterations of workforce legislation. While not all the local workforce areas met performance under WIA, corrective action has been taken and in accordance with a request from the chief elected official we have merged the failing area into its neighbor. We believe that this designation will result in improved performance.
Each of the Planning Regions will be required to describe how they plan to meet performance and a review of their Plans will include a determination of whether the described strategies are likely to result in the required performance numbers. Where they are not meeting performance, technical assistance may be offered and the regions may be instructed to continue to work on appropriate strategies.

The State's data collection and reporting system allows the state to produce monthly reports which are used by our local workforce areas as an indicator of the likelihood they will meet performance. As the state collects the information quarterly, Oklahoma Works will be able to assess the progress of the partners in meeting the State’s vision and goals. Local areas and Planning Regions are expected to take actions as necessary to make course corrections based upon review of the data.

Oklahoma Works and the Governor’s Council will encourage all Core Program partners to describe in the Memorandum of Understanding (MOU), to be entered into at the local level, how they will create a symbiotic environment in which the partners can be instrumental in helping each other meet the new measures through dual enrollment, leveraging funds, shared case management and shared follow up as applicable. Regional partners will be required to negotiate performance measures and each region would conduct regular reviews internally to determine if the region is on target to meet the annual performance measures. The results of the regular reviews will be included in both the Regional MOU Annual Renewals and in the Center Certification documentation. The MOU and the Center Certifications are reviewed by Oklahoma’s Workforce System Oversight Subcommittee with recommendations going to the Workforce System Oversight Committee of the Governor’s Council.

Regular monitoring of the core programs, which is part of the responsibility of the regional one-stop operator, and 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. As deficiencies are found by state level reviews, the regional area will be notified and may receive an observation or finding in the reports with applicable corrective action requested of the core partner.

For this Plan (PY 2018 - PY 2019), Oklahoma will work with the Departments during the negotiation process to establish the negotiated levels of performance for each of the primary indicators for the core programs. For those performance indicators where there is insufficient data available on which to build the required statistical adjustment model and consequently, to establish levels of performance, Oklahoma will continue to use a “Phased-in” approach to set levels of performance for the “baseline” indicators determined by the Departments. A “baseline” indicator is one for which Oklahoma will not propose an expected level of performance in the plan and will not enter into negotiations with the Departments, these indicators remain the same as previously submitted.

The PY 2016-PY 2017 six primary indicators of performance under WIOA for each core partner (note that primary indicator four and five do not apply to Wagner-Peyser Employment Services) are:

1) Entered Employment - The percentage of participants who are in unsubsidized employment during the second quarter after exit from the program.
2) Employment Retention - The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program.

- PY 2016/2017 Adult 61.5%
- PY 2016/2017 Dislocated Worker 73.9%
- PY 2016/2017 Youth 62.7%
- PY 2016/2017 Wagner-Peyser 61.5%
- PY 2016/2017 ABE - baseline
- PY 2016/2017 DRS - baseline

3) Median Earnings - The median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program.

- PY 2016/2017 Adult $4,664
- PY 2016/2017 Dislocated Worker $6,084
- PY 2016/2017 Youth - baseline
- PY 2016/2017 Wagner-Peyser $4,664
- PY 2016/2017 ABE - baseline
- PY 2016/2017 DRS - baseline

4) Credential Attainment Rate - The percentage of participants who obtained a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program. A participant who has obtained a secondary school diploma or its recognized equivalent is only included in this measure if the participant is also employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year from program exit.

- PY 2016/2017 Adult 60.9%
- PY 2016/2017 Dislocated Worker 56.8%
- PY 2016/2017 Youth 44.5%
- PY 2016/2017 ABE - baseline
- PY 2016/2017 DRS - baseline

5) Measurable Skills Gains - The percentage of participants who during a program year are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains, defined as documented academic, technical, occupational or other forms of progress towards such a credential or employment.
6) Effectiveness in Serving Employers (not yet defined by DOL or ED) - This will be based on indicators developed as required by Section 116(b)(2)(A)(iv) of WIOA. Oklahoma has elected to pilot the three approaches developed by the Departments.

- Retention with the same employer - addresses the programs’ efforts to provide employers with skilled workers;
- Repeat Business Customers - addresses the programs’ efforts to provide quality engagement and serve to employers and sectors, and to establish productive relationships with employers and sectors over extended periods of time; and
- Employer Penetration Rate - addresses the programs’ efforts to provide quality engagement and service to all employers and sectors within the State and local economy.

The state also ensures that local workforce development areas meet performance accountability measures in addition to the provision of quality services to individuals and employers, and the state will provide technical assistance when needed. The local boards and state partners are very familiar with the continuous improvement principles. Results of assessments both positive and negative will be communicated to the local boards and partners. As appropriate, corrective action including plans for improvement will be requested in accordance with continuous improvement principles and evaluated for their likelihood of success.

The Workforce System Oversight Committee plans to assess the need for a policy on assessments of performance to ensure that each region has a performance review to identify that the current actions are being coordinated through regional MOUs and regional plans. This approach will document the quality, effectiveness and improvement of each region thereby allowing core partners to review relevant information and take action to improve the system.

OKStateStat

Under the leadership of Governor Mary Fallin and her cabinet, Oklahoma developed a performance transparency website to showcase performance-informed budgeting efforts, www.OKStateStat.ok.gov. Outcome measures were established within a framework of five strategic statewide goals and 52 underlying State Programs. The five strategic statewide goals include: Healthy Citizens and Strong Families, Safe Citizens and Secure Communities, Educated Citizens and Exemplary Schools, Prosperous Citizens and Thriving Economy, and Effective Services and Accountable Government.

The OOWD monitors and reports on seven specific performance measures included in three of the five underlying State Programs. These include:

Wealth Generation:
Increase the per capita personal income as a percentage of the national average from 94.43% in 2013 to 98.20% by 2017.

Increase the state median household income from $45,339 in 2013 to $51,424 in 2017.

Decrease the state income poverty rate from 16.8% in 2013 to 15.3% in 2017.

**Workforce Participation:**

- Increase the state labor force from 1.803 million in 2013 to 1.93 million in 2017.
- Increase the total labor force participation rate from 61.11% in 2013 to 64.00% in 2017.

**Innovation:**

- Increase the number of patents filed in Oklahoma from 604 in 2013 to 633 by 2017.
- Increase exports attributable to science and technology industries from $40.98 billion in 2014 to $47.0 billion in 2017.

Statistics appropriate to trend the state’s progress toward these outcomes are reported annually to the Oklahoma State Office of Management and Enterprise Services (OMES) for publication on the website. Data are currently available through 2016.

**B. ASSESSMENT OF ONE-STOP PROGRAM PARTNER PROGRAMS**

Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. Such state assessments should take into account local and regional planning goals.

The State will continue to develop standard data gathering across core programs to determine the structure of joint reports in the future, calling on the expertise of core entities. The state and local areas will be assessed based on a comparison of the actual performance level with the adjusted level of performance annually.

The regional Memorandums of Understanding that are negotiated with each partner will further detail locally-identified requirements for integrated service delivery. Each region will create a plan to measure agreed upon success factors, which will include continuous improvement strategies to ensure high quality customer service at the Oklahoma Works American Job Centers. Currently, the state is exploring additional state-level criterion to assess the effectiveness of partnerships and outcomes.

**C. PREVIOUS ASSESSMENT RESULTS**

Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle). Describe how the State is adapting its strategies based on these assessments.
The State will be assessing programs against negotiated performance on a quarterly and annual basis. In negotiating new levels, the state will look at how well core partners did on the previously negotiated measures. For those performance indicators, where there is insufficient data available on which to build the required statistical adjustment model and consequently, to establish levels of performance, Oklahoma will continue to use a “Phased-in” approach to set levels of performance for the “baseline” indicators determined by the Departments. “Baseline” indicators have been and will continue to be collected and evaluated to determine ongoing strategies for the assessment of effectiveness of the core programs and other one-stop partner programs included in Oklahoma’s State Plan.

For programs that meet or exceed performance the state will evaluate the economy and performance of the planning region or local area as appropriate. For areas where they have been barely meeting performance, the state will examine whether the area is in need of technical assistance, has implemented best practices or should be under a corrective action plan with respect to their performance. As appropriate, the state will communicate with the appropriate elected official.

D. EVALUATION

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

The System Oversight Subcommittee (SOS), a subcommittee of the Governor’s Council for Workforce and Economic Development (GCWED) is creating a WIOA-compliant assessment tool, which is organized under three standards categories (Governance, Business Services and Job Seekers Services) and includes corresponding indicators that are components of each element. Local and Regional Teams will use this tool to examine each indicator to assess their local area and region’s progress toward achieving a quality system. The SOS will use this completed tool to evaluate region and local progress and implementation to create a better workforce development system for Oklahoma.

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.

Currently, two research and evaluation projects are underway:

- Common Customer Satisfaction Tool Development: Customer service satisfaction surveys are routinely employed by WIOA partners in Oklahoma; however, questions are specialized, targeted to each organization’s needs, and results are not routinely
shared. In order to coordinate efforts and eliminate duplication, a data committee has been convened with representatives from OOWD, the Oklahoma Employment and Securities Commission, Oklahoma Department of Career and Technology Education, and the Oklahoma Department of Rehabilitation Services. One of the goals of the committee is to design and implement a common customer survey instrument applicable to and for use by all of the partners.

- Equal Opportunities Research Project: Utilizing existing programmatic and labor market data, this project seeks to evaluate the provision of services to targeted populations as well as the associated possible risk of discrimination as defined by federal law. Targeted populations are based on age, gender, religion, race, ethnicity, English Language Learners’ level of English proficiency and primary language preference, and the existence of a disability. The goals of this project are twofold

346. To determine if the demographics of individuals receiving services accurately represent the statewide population; and,

347. To compare the outcomes of individuals served by demographic cohort.

Based upon the results of this research project, strategies will be developed to increase awareness and address possible inequities in service provision and to provide recommendations for enhanced outreach to affected populations in the state. The project is scheduled for completion in 2018.

Several additional research topics have been submitted for consideration for future evaluation. These include proposals focused on Registered Apprenticeships and Internships, Needs Assessments, and specialized Industry Sector studies.

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

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

A. FOR TITLE I PROGRAMS

For Title I programs, provide a description of the written policies that establish the State’s methods and factors used to distribute funds to local areas for—

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

In order to distribute funding for WIOA Title I Youth programs, the State of Oklahoma uses a discretionary allocation formula. Adjusting the formula, in accordance with WIOA Section 128 (B)(3), enables the state to distribute funding based on prescribed economic data as well as economic data specific to Oklahoma’s economy, regional variation, as well as the barriers Oklahoma’s workforce faces.

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

- Areas of Substantial Unemployment - 28.333%
An Area of Substantial Unemployment (ASU) is 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%. Due to accepted geographic terms and concepts, the state elects to use counties as the geographic area when determining and calculating ASUs in Oklahoma.

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

Data used to calculate Areas of Substantial Unemployment is sourced by the Bureau of Labor Statistics and the United States Census Bureau.

- Excess Unemployment - 28.333%

Excess Unemployment is the number of unemployed individuals over 4.5% of the civilian labor force. In order to maintain a standard in data analysis and formula calculations the state also uses counties as the geographic area when calculating Excess Unemployment in Oklahoma.

The number of unemployed individuals in excess of the 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.

- Data used to calculate Excess Unemployment is sourced by the Bureau of Labor Statistics.

Disadvantaged Youth - 28.333%

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. In order to maintain a standard in data analysis and formula calculations the state continues to use counties as the geographic area when calculating Disadvantaged Youth in Oklahoma.

The number of disadvantaged youth in each county is divided by the total number of disadvantaged youth across the state calculating the appropriate dollar amount each county is to receive.

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 ensures resources are made available to WDAs whose workforce faces additional obstacles.
Excess Youth Poverty is the relative number of individuals, under the age of 18, living below the poverty level in a geographic area whose percentage of population for whom poverty status is determined is greater than the state’s percentage. In order to maintain a standard in data analysis and formula calculations the state again uses counties as the geographic area when calculating Excess Youth Poverty in Oklahoma.

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 is less than or equal to the state’s percentage does not receive any funding for the final formula factor.

Data used to calculate Excess Youth Poverty is sourced by the United States Census Bureau.

To calculate the initial formula allocation for Youth Activities in accordance with WIOA Section 128, the dollar amount calculated for each county based on the four factors is summed. The county totals are then summed by Workforce Development Area.

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 will be ratably reduced from those areas whose initial formula allocation is higher than the 90% minimum award. This process ensures award amounts from year to year do not result in the often extreme fluctuations of unemployment and population.

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

In order to distribute funding for WIOA Title I Adult programs, the State of Oklahoma elects to utilize a discretionary allocation formula. Adjusting the formula, in accordance with WIOA Section 133 (B)(3), enables the state to distribute funding based on prescribed economic data as well as economic data specific to Oklahoma’s economy, regional variations, as well as the barriers Oklahoma’s workforce faces.

Upon receipt of the federal NOA, the OOWD calculates an 85% minimum amount of the state’s total adult allocation to distribute to the designated local WDAs throughout the state. The following criteria and weighted values determine the amount of funding to be awarded to each area for Title I Adult programs:

- Areas of Substantial Unemployment - 28.333%

An Area of Substantial Unemployment (ASU) is 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%. Due to accepted geographic terms and concepts, the state elects to use counties as the geographic area when determining and calculating ASUs in Oklahoma.

The number of unemployed individuals within an ASU is summed and weighted calculating the appropriate dollar amount each ASU is to receive. A county that does not meet the three criteria for an ASU does not receive any funding for the first formula factor.
Data used to calculate Areas of Substantial Unemployment is sourced by the Bureau of Labor Statistics and the United States Census Bureau.

- Excess Unemployment - 28.333%

Excess Unemployment is the number of unemployed individuals over 4.5% of the civilian labor force. In order to maintain a standard in data analysis and formula calculations the state also uses counties as the geographic area when calculating Excess Unemployment in Oklahoma.

The number of unemployed individuals in excess of the 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.

Data used to calculate Excess Unemployment is sourced by the Bureau of Labor Statistics.

- Disadvantaged Adults - 28.333%

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. In order to maintain a standard in data analysis and formula calculations the state continues to use counties as the geographic area when calculating Disadvantaged Adults in Oklahoma.

The number of disadvantaged adults in each county is divided by the total number of disadvantaged adults across the state calculating the appropriate dollar amount each county is to receive.

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 ensures resources are made available to WDAs whose 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 whose percentage of population for whom poverty status is determined is greater than the state’s percentage. In order to maintain a standard in data analysis and formula calculations the state again uses counties as the geographic area when calculating Excess Adult Poverty in Oklahoma.

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 is less than or equal to the state’s percentage does not receive any funding for the final formula factor.

Data used to calculate Excess Adult Poverty is sourced by the United States Census Bureau.

To calculate the initial formula allocation for Adult Activities in accordance with WIOA Section 133, the dollar amount calculated for each county based on the four factors is summed. The county totals are then summed by Workforce Development Area.

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 will be ratably reduced from those areas whose initial formula allocation is higher than the 90% minimum award. This process ensures award amounts from year to year do not result in the often extreme fluctuations of unemployment and population.

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

In order to distribute funding for WIOA Title I Dislocated Worker programs, using the required information in WIOA section 133(b)(2)(B)(ii) and economic information unique to Oklahoma, The State of Oklahoma designates a six factor formula. This formula enables the state to distribute funding based on prescribed economic data as well as economic data specific to Oklahoma’s economy, regional variations, as well as the barriers Oklahoma’s workforce faces.

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 throughout the state. Due to the state’s historically low levels of unemployment, factors closely related to concentrations of unemployment are more heavily weighted. The following criteria and weighted values determine the amount of funding to be awarded to each area for Title I Dislocated Worker programs:

- 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. In order to maintain a standard in data analysis and formula calculations, the state continues using counties as the geographic area when calculating Unemployment Insurance in Oklahoma.

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 used to calculate Unemployment Insurance is sourced by the Oklahoma Employment Security Commission.

- Long-term Unemployment - 25%

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. In order to maintain a standard in data analysis and formula calculations the state continues to use counties as the geographic area when calculating Long-term Unemployment in Oklahoma.

The number of long-term unemployed individuals in each county is divided by the total number of long-term unemployed in the state calculating the appropriate dollar amount each county is to receive.

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

- Unemployment - 25%

Unemployment, as a formula factor, is the number of unemployed individuals in each county in relation to the number of unemployed individuals across the state. In order to maintain a standard in data analysis and formula calculations, the state again uses counties as the geographic area when calculating Unemployment in Oklahoma.

The number of unemployed individuals in each county is divided by the total number of unemployed individuals in the state calculating the appropriate dollar amount each county is to receive.

Data used to calculate Unemployment is sourced by the Bureau of Labor Statistics.

- Declining Industries - 15%

Declining Industries data shows job loss in a geographic area within industries in Oklahoma with consistently declining employment. In order to maintain a standard in data analysis and formula calculations, the state uses counties as the geographic area when calculating Declining Industries in Oklahoma.

The number of jobs lost, in declining industries, 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 experienced job growth, instead of loss, does not receive any funding for the fourth factor.

Data used to calculate Declining Industries is sourced by the Oklahoma Employment Security Commission.

- Farmer Rancher Economic Hardship - 10%

Farmer Rancher Economic Hardship demonstrates decline in Oklahoma’s farming and ranching workforce by analyzing the change in net cash farm income and the change in the number of operating farms. In order to maintain a standard in data analysis and formula calculations, the state continues to use counties as the geographic area when calculating Farmer Rancher Economic Hardship.

The change in net cash farm income in each county, with a negative change, is divided by the total negative change in the state. The change in number of operating farms in each county, with a negative change, is divided by the total negative change in the state. The values as
calculated for both net cash farm income and number of operating farms are averaged calculating the appropriate dollar amount each county is to receive. A county experiencing growth in one or both of the changes equals zero, lowering their average or awarding them no funding for the fifth factor.

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 and/or report on this information. Therefore, the sixth and final factor is weighted at zero and no funding will be distributed for Mass Layoff.

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 will be ratably reduced from those areas whose initial formula allocation is higher than the 90% minimum award. This process ensures award amounts from year to year do not result in the often extreme fluctuations of unemployment and population.

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

B. FOR TITLE II:

I. MULTI-YEAR GRANTS OR CONTRACTS

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.

Distribution of Funds for the Adult Basic Education Grant

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.

Once these ABE service areas are determined, 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. 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 Measureable 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 regrant 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.

**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.

(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.

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.
In November 2017 the Oklahoma Department of Career and Technology Education began a competition to award funds in a multi-year competition for Adult Basic Education grants, IELCE grants, and Corrections Education grants. The applications were due January 31, 2018. Eligible agencies had the option of being able to apply for one or more of these grants. Eligible agencies had the option of applying for one or more service areas in the Adult Basic Education grant. Agencies also had the option to apply for an IELCE grant and/or a Corrections Education grant. One RFP was 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?
- English language acquisition?
- Other subject areas relevant to the services?
- Employment?
- Attainment of secondary school diploma or its recognized equivalent?
- 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 2018-2019, 2019-2020, 2020-2021, and 2021-2022. After this time, recipients may have
the option of applying for a grant extension. This grant extension can be renewed in subsequent years until the ODCTE determines that a new multi-year competition for the grant needs to occur.

II. ENSURE DIRECT AND EQUITABLE ACCESS

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. Notification of the RFP will first take place on the ODCTE website. Subsequent notification may follow through electronic as well as other means to those parties potentially interested in applying for the grant. 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 with 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.

C. TITLE IV VOCATIONAL REHABILITATION

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

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

Title I, Part B, Priority Group 1 - Estimated Funds = 9,590,258 (Average Cost of Services = 2,572)

Title I, Part B, Priority Group 2 - Estimated Funds = 10,320,846 (Average Cost of Services = 2,572)

Title I, Part B, Priority Group 3 - Estimated Funds = 1,705,564 (Average Cost of Services = 2,572)

Title VI, Part B - Estimated Funds = 300,000 (Average Cost of Services = 4,700)

6. PROGRAM DATA

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

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

Currently, two partners under WIOA operate the same case management/reporting system
for their respective programs. Labor Exchange and Title 1 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 and while it has been practical and economical, it is
not utilized by all of the core partners. All of the partners have a computerized case
management system that meets the specific requirements of each program. Integrating to a
unified system and adjusting for a streamlined intake and service delivery system is high
priority. Oklahoma is currently in the process of developing integrated information access
that will link data across all core programs improving data collection and dissemination,
create integrated case management and reporting across core programs.

Currently each core partner will continue to use their existing systems, updated as
necessary, to gather the needed information for performance reporting as required by
WIOA. The Oklahoma Employment Security Commission, through data sharing MOUs,
provides the required wage information for federal reporting purposes in compliance with
applicable federal and state laws.

Oklahoma expects the regions to enter into data sharing agreements based on local MOUs.
In the future as data systems are procured and upgraded, the state will look at ways in
which the data can be accessible between among our one-stop partners along with the
appropriate confidentiality agreements.

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

Oklahoma is committed to the goals of eliminating duplication of services and addressing
the needs of common intake and case management, the core partners are in discussions to
increase the exchange of data to the maximum extent possible. Data sharing MOUs will
address the use of wage record data in order to successfully comply with WIOA
performance accountability measures and state indicators of performance. Integrated
information access is being developed to provide a platform for linking data across core
partners to streamline intake and service delivery across all programs. Integrated
information provides real-time data to be used allowing participants to be tracked across
programs eliminating service duplication and partner service utilization. The WIOA Data
Group has been organized for this purpose, and has full support of leadership to work towards integration for intake, performance, and reporting.

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

Oklahoma is dedicated to developing a roadmap towards 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’ certificate 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.

An objective of the Oklahoma Works Strategic Delivery Plan is to integrate and utilize workforce and economic development data to inform policy, track progress, and measure success. The written plan, approved by the Governor, formally engages Workforce System Agency Partners from the State Regents for Higher Education, the State Department of Education, the Oklahoma Department of Career and Technology Education, and the Oklahoma Office of Management and Enterprise Services. 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.

Integrated information access is being developed to provide a platform for linking data across data-generating agencies necessary to improve data collection and dissemination, and to inform and support the objectives of Oklahoma Works. The efficiencies achieved through integrated information access and virtual services are expected to result in cost savings that will then be applied to the maintenance and enhancement of the workforce data enterprise system. Existing WIOA formula funds can be used, at the Governor’s discretion, to assist with data collection and research projects at the state and local levels that are conducted and/or guided by Oklahoma State University-Oklahoma City.

Given this context, the state is approaching the matter of data-sharing and the building of interoperable data systems with the following principles in mind:

- The technological construction for interoperable data-systems is constructed to aid the objectives of the programs they are designed for and will not wrongly constrain or predetermine the policy choices of program administrators and operators in a way that restricts the capacity for policy innovation.
- Data-sharing and data integration efforts are most logical where there is a commonality of importance, necessity, or purpose and set goals. All efforts to improve data-sharing agreements or, where appropriate, move towards data-integration will proceed on the basis of value-added partnership such that all partners gain something from the partnership.
- Agreements recognize and take into account the varied needs of different programs and consumer populations, the varying privacy requirements of different programs, recognition of data-ownership by program operators, and the need to work
collaboratively to create shared solutions that serve both the programs being
operated, and the consumer receiving services.
- Data-sharing and data integration was developed in order to meet state and federal
privacy and security standards as well as those of each partner agency.
- The State Board has created workgroups to assist the Governor in aligning
technology across core programs and One-Stop mandatory partners with the goal of
improving service delivery to individuals.

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

IV. DESCRIBE THE STATE’S PLANS TO DEVELOP AND PRODUCE THE REPORTS
REQUIRED UNDER SECTION 116, PERFORMANCE ACCOUNTABILITY SYSTEM.
(WIOA SECTION 116(D)(2)).

State agencies will 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 State created the WIOA Data Group to develop these
processes, and has full support of leadership to coordinate across platforms for the
purposes of the Oklahoma Works system.

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.

The Policy and Performance Officer for 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 the Policy and Performance Officer the appropriate PIRL files for WIOA Title I Adult, Dislocated Worker, Youth, and Discretionary Grants. The Title I Policy and Performance Officer 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 case managers 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. Starting July 1, 2017 OKDRS began collecting data required for the new
performance accountability indicators to the U.S. Department of Education, Rehabilitation Services Administration (RSA). OKDRS anticipates quarterly reports to local WDBs to demonstrate performance for decision-making.

Planning Note: States should be aware that Section 116(i)(1) requires the core programs, local boards, and chief elected officials to establish and operate a fiscal and management accountability information system based on guidelines established by the Secretaries of Labor and Education. States should begin laying the groundwork for these fiscal and management accountability requirements, recognizing that adjustments to meet the elements above may provide opportunity or have impact on such a fiscal and management accountability system.

B. ASSESSMENT OF PARTICIPANTS’ POST-PROGRAM SUCCESS

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

The State Workforce Partners will establish an annual review of funding sources and incentives provided by federal, state and local sources. In addition, the State Workforce Partners will chart the effectiveness of federal and state funding for education, workforce and economic development systems throughout the state.

The Governor of Oklahoma has set a performance funding budget model for each of Oklahoma’s agencies which includes all core workforce partners to deliver the performance expected while staying within their monetary allotments.

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, Measurable Skill Gains, and Effectiveness in Serving Employers. 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.

The workforce system oversight subcommittee will conduct an annual review of the funding sources and incentives provided by federal, state and local sources. This review will assist in charting the way federal and state funds are utilized by both the educational system and workforce development system in the state. The measures, goals and objectives negotiated by the core partners will be used to gauge the effectiveness of the workforce system as a whole. The Local Workforce Development Areas will be reviewed to ensure they are meeting the goals and objectives outlined in their local plans for effectively using workforce dollars to meet the educational and employment needs of the participants seeking service through the integrated workforce system, and the 40% minimum training requirement. In 2017, Oklahoma added the use of FiscalLink as a tool to better conduct a return on investment (ROI) analysis on training programs. The Oklahoma Works centers will be
measured using the "New Day, New Way" guidelines developed by the Governor’s Council for Workforce Development ensuring ease of access for all.

“A New Day, New Way” began under the Workforce Investment Act and has been revived under the Workforce Innovation and Opportunity Act, and focuses on Oklahoma Works Center certification with input and guidance from all workforce partners. After Center certification is implemented, “A New Day, New Way” will focus on system-level certification.

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.

Additionally, a WIOA Data Team is routinely being convened, as well as the Oklahoma Education and Workforce Data Collaborative team, as part of the Oklahoma Works initiative, to make decisions on the statewide data sharing component, as well as continue the difficult work of linking data across more than WIOA Core Programs.

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

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

The state is currently working on MOUs with core partners as well as reviewing state statutes to allow for data sharing among core partners. Some agreements have been made while others are in process. Although agreements haven’t been made with all partners, Oklahoma has used 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 and Title III programs as prescribed in WIOA.

D. PRIVACY SAFEGUARDS

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

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, 128-byte encryption, SSL and individual password protection to guard against unauthorized access as mandated by state laws and guidelines enforced by OMES IS.

Accomplishment

In Program Year 2017, the Oklahoma Office of Workforce Development (OOWD), in compliance with Federal guidance on the handling and protection of personally identifiable information, issued a data integrity policy under which employees and other personnel, before being granted access to personally identifiable information, acknowledge their understanding of the confidential nature of the sensitive/proprietary/private data and the safeguards with which they must comply in their handling of such data, as well as the fact that they may be liable to civil and criminal sanctions for improper disclosure.

7. PRIORITY OF SERVICE FOR VETERANS

Describe how the State will implement and monitor the priority of service provisions for veterans in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor. States should also describe the referral process for veterans determined to have a significant barrier to employment to receive services from the Jobs for Veterans State Grants (JVSG) program’s Disabled Veterans’ Outreach Program (DVOP) specialist.

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.

Several military hiring events have taken place in 2016 and 2017 across Oklahoma, including in Tulsa, Muskogee, Enid, Oklahoma City, Ft. Sill, and Durant, OK. In addition, several events are already on the calendar for 2018 and even one for January of 2019.
In support of this effort, OOWD launched a website (OKmilitaryconnection.com) to connect veterans with these events by pre-registering them and matching them to participating employers at many of these events.

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.

The Oklahoma Works Veteran Survey was launched in September of 2107 and was fielded to student veterans at postsecondary institutions across the state of Oklahoma. The purpose of the survey was to better understand the obstacles or difficulties military and veteran students face when trying to access benefits or any other challenges in college experiences in general. An unexpected and noteworthy finding from the survey is that 52.9% of respondents were first generation students. The following chart illustrates that first generation students indicated they did not understand how to utilize their G.I Benefits more than their non-first generation peers. This finding speaks to the broader point that a large first generation student veteran population represents a greater need for assistance, i.e., more likely to have questions and the need for guidance while navigating the enrollment and certification process.

In Oklahoma, veterans and others eligible for services under Jobs for Veterans State Grants (JVSGs) are identified at various points of entry into Oklahoma’s workforce development system. All customers so identified receive priority of service. Through an assessment process using a state provided military registration checklist designed to determine significant barriers to employment, eligible veteran customers at Workforce 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 Workforce Center staff for services. Workforce 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 eligible, when the veteran is referred to the DVOP for services. When veterans are registered in OKJobMatch, the state job match and case management system, Workforce Center staff are able to identify those significant barriers to employment for referral to DVOPs.

All local office staff and workforce system partners performing labor exchange through the current Oklahoma electronic workforce system are required to provide veterans and other eligible 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
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 procedures in place for priority of service for veterans in their area.

The State assures that veterans and others eligible for JVSG-funded services will be afforded employment and training activities authorized in section 134 of the Workforce Innovation and Opportunity Act, and the activities authorized in Chapters 41 and 42 of Title 38 U.S.C. The State assures that it will comply with the Priority of Service for Veterans established in the Job for Veterans Act (Public Law 107-288). The State and the Veterans Employment and Training Service have a memorandum of understanding to ensure services will be provided to veterans as described in Title 38 U.S.C., Chapters 41, 42 and 43; at 20 CFR Chapter IX, CFR, codified at 20 CFR 1001, 100; and all applicable Training and Employment Guidance Letters (TEGLs) and Veterans’ Program Letters (VPLs).

All four workforce regions 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.

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

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

Oklahoma is focused on 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. 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, 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 (Oklahoma’s Vocational Rehabilitation Program) and Oklahoma ABLE Tech (Oklahoma’s Assistive Technology Act Program).

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.

The Oklahoma Office of Workforce Development (OOWD) and its partners, strive to expand capacity, enhance partnerships, and improve service delivery to improve training and employment opportunities and outcomes for youth and adults with disabilities who are unemployed, underemployed, and/or receiving Social Security disability benefits. Staff work daily with a variety of partners locally and across the state that provide services to individuals with disabilities and the general population either directly at the Oklahoma Works centers or through referrals to partner facilities.

These partners include education/training institutions; employers; healthcare, mental health, and childcare facilities; faith-based organizations; community-based non-profits; legal assistance providers; and other state and federal agencies, such as the Department of Rehabilitation Services (OKDRS), Veterans Administration, Department of Human Services, Department of Housing and Urban Development, and the Department of Corrections. Many of these linkages are formal and codified in memorandums of understanding.

OOWD works to develop and support increased employment opportunities for individuals with disabilities. Oklahoma Works Center staff routinely refer individuals with disabilities to the OKDRS for more intensive training and job placement opportunities. OKDRS 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 OKDRS offices.

Workforce Center staff and OKDRS Benefits Planners collaborate to assist job seekers receiving SSA benefits. Specifically, 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. 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. OKDRS Benefits Planners address concerns of individuals with disabilities about the possibility of losing benefits and help them understand and maximize their work incentives.

Oklahoma Adult Education Program - serving individuals with disabilities

Adults with disabilities fall into two major categories: 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**

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, OKDRS and OKABT will lead the workforce partners in arranging and developing training to businesses and employers in order to reduce their hesitation to hire job seekers with disabilities and to identify ways to educate employers 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.

OOWD partners with OKDRS to 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 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**

Oklahoma’s Workforce System commitment to enhanced accessibility continues by incorporating accessibility seamlessly into the everyday business practices of the local areas. Access for All within the Oklahoma Works system, is a standard that has been set to springboard success for Oklahoma’s business and employers and job seekers in reaching Oklahoma’s Goal of Wealth Generation.

The one-stop system standards and certification criteria policy are designed to integrate physical and programmatic accessibility by incorporating the Access for All Certification process into the benchmark criteria for center certification. The Access for All Certification process includes two parts—physical and technology. The fullAccess for All Certification Process details the requirements necessary, and provides tools, to receive certification under the Oklahoma Works Workforce System Access for All initiative.

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.

Ensuring opportunities and access for all is critical to meet the goal of 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.

**Accomplishments**

In Spring 2016, Governor Mary Fallin transitioned the equal opportunity and nondiscrimination responsibilities from the Oklahoma Employment Security Commission (OESC) to the Oklahoma Office of Workforce Development (OOWD).

June 2017, OOWD issued a center certification policy for all comprehensive and affiliate Oklahoma Works (One-Stop) Centers (OWDI 07-2017). This policy made physical and programmatic accessibility a minimum requirement when assessing and applying for center certification. In August 2017, OOWD issued a new system-wide equal opportunity and nondiscrimination policy (OWDI 13-2017, Change 2). In August 30, 2017, the State-Level Equal Opportunity Officer was designated by Governor Mary Fallin to coordinate system compliance for equal opportunity and nondiscrimination issues. Finally, in September 2017, OOWD issued a Limited English Language Proficiency Policy (OWDI 17-2017). The policy requires LWDBs to take reasonable steps to ensure that LEP individuals have meaningful access to their program and activities.

In January 2018, OOWD issued WIOA Section 188 Discrimination Complaint Procedures Governing WIOA Activities and Oklahoma Works (One-Stop) Center Activities (OWDI 01-2018). The policy was developed to centralize complaint processing procedures for equal opportunity and nondiscrimination issues arising in the Oklahoma Works (one-stop) Centers.

OOWD partnered with OKDRS to conduct ADA Physical Accessibility Site Reviews, as a part of the center certification process, for every Oklahoma Works (One-Stop) Centers and create corrective action plans (Equally Effective Alternative Access Plans) for all centers with barriers to accessibility. Access for All trainings were delivered in 2018. Access for All trainings covered disability etiquette, review of and how to use available assistive devices.

**Goals 2018-2020**

Goals for 2018-2020 are:

- Increasing OOWD sponsored equal opportunity and nondiscrimination trainings. The first annual Equal Opportunity Summit is scheduled for March 2018. This Equal Opportunity Summit will include presentations from OOWD’s partners, OKDRS and OKABT on accessibility in physical and technology environments.
Develop customize Equal Opportunity Data Presentations for each local area that compares state data, workforce area data, and county data to assess service area delivery needs and expand areas of outreach. These reports include data and analysis on five categories related to equal opportunity, including disability status and type, race and ethnicity, English Language Learners, and religion and will be distributed annually at the Equal Opportunity Summit.

OOWD to expand and further strengthen partnerships with OKDRS and OKABT to ensure customized and thorough technical assistance is consistently available to all LWDBs and is available upon request. This will include, but is not limited to, development of document remediation plans, ADA Accessibility Site Reviews for proposed center locations, accessibility reviews and vendor assessments related to procured technology.

Further develop an Oklahoma Works (one-stop) Center Certification monitoring process to review all one-stop locations, in part to determine physical and technology accessibility, among other center coordination. The first center certification monitoring will begin in 2108 and will serve as technical assistance to help LWDBs prepare for center certification monitoring in the 2019 annual monitoring schedule.

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

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

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

For example, one of the policies provides quality and timely language assistance services to customers with English language learners by ensuring meaningful access and accessibility to all programs, services and activities, regardless of the funding source.

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. 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.

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:

- In emergency situations while awaiting a qualified interpreter;
- When the information conveyed is of minimal importance to the services to be provided; or
- 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))

**Accomplishments**

In September 2017, OOWD issued a Limited English Language Proficiency Policy (OWDI 17-2017). The policy 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:

- Conducting an assessment of an LEP individual to determine their language assistance needs.
- Providing oral interpretation or written translation of both hard-copy and electronic materials, in the appropriate non-English languages, to LEP individuals
- Conducting outreach to LEP communities to improve service delivery in needed languages.
OOWD continued to worked closely with our case management vendor, America’s Job Link Alliance (AJLA), to update how the system collects information on LEP and English Language Learners (ELL) to improve accuracy. Oklahoma was one of the first states to provide recommendations to the vendor on the collection of this data.

OOWD distributed a language identification tool to all LWDB Local Equal Opportunity Officers.

Distributed "Equal Opportunity is the Law" posters in Spanish to all LWDB Local Equal Opportunity Officers.

Goals 2018-2020

Goals for 2018-2020 are:

- Create Equal Opportunity Data Presentations to be distributed at the Annual Equal Opportunity Summit scheduled for March 2018. Local Equal Opportunity Officers and other attendees will be presented with a robust Equal Opportunity Data Presentation, which includes a comparison of statewide data, local workforce area, and county data. The Equal Opportunity Data Presentations provide LWDBs the tools needed to expand outreach to LEP and ELL individuals and ensure staff are trained and resources are available to effectively serve this population.

- One of the primary ways OOWD plans to address the needs of the ELL individuals in Oklahoma is to require every LWDB to implement LEP Plans consistent with OOWD’s policy on LEP individuals (OWDI 17-2017). These plans are designed to ensure that ELL and LEP individuals needs are effectively addressed and planned for on a local level. Additionally, for the larger metropolitan areas like, Oklahoma City and Tulsa, which have the highest non-native English speaking populations in Oklahoma, OOWD plans to offer additional technical assistance for developing effective LEP plans and outreach strategies for ELL individuals.

- Encourage LWDBs to hire and staff centers with linguistically and culturally competent staff, including highly trained career counselors and multilingual staff in languages spoken by the largest customer groups.

- Encourage LWDBs to align English language proficiency training with career pathways and/or in-demand occupations
Describe the methods used for joint planning and coordination among the core programs, and with the required one-stop partner programs and other programs and activities included in the Unified or Combined State Plan.

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, 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. The Unified State Plan was approved by the Governor’s Council for Workforce and Economic Development on January 29, 2016. Following approval, the plan was placed on www.OklahomaWorks.gov for formal public comment and review. The Plan was revised and submitted in June 2016 at that request of the USDOL.

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

**Oklahoma Works Initiative**

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 have developed metrics for targeted wealth generation across Oklahoma. The GCWED selected targets from these metrics, housed on OKStateStat.OK.gov, that form the foundation of the Governor’s Council Dashboard. This dashboard facilitates the use of data to inform policy, track progress, and measure success consistently statewide.

Key Economic Networks (KENs) are areas in which labor market data demonstrate geographic similarities with regard to occupations and commuting patterns. Within these areas, regional business leaders, educators, private organizations, and workforce partner staff collaborate to identify solutions to local challenges that, when addressed regionally, will help to grow a skilled workforce and encourage wealth generation in the state. Each KEN region has a Champion, a regional leader from business and industry appointed by the Governor who coordinates local efforts to support Oklahoma Works.

Oklahoma Works is an initiative designed to increase the wealth of all Oklahomans through providing education and training for citizens to obtain quality employment. The goal of Oklahoma Works is to implement wealth-generating policies across the state through the alignment of private and public strategic priorities, helping all Oklahomans to achieve the American Dream. To achieve the overarching goal of wealth generation for all Oklahomans and combat the skills gap, the Office of the Governor, its state workforce partners, and numerous other contributors created this plan.

As part of Oklahoma Works, state workforce partners will intentionally align and connect education and workforce resources to better provide support and remove workforce barriers for the citizens of Oklahoma. Workforce partners will also establish an annual review of funding sources and incentives provided by federal, state, and local sources and chart the effectiveness of federal and state funding used by the state’s education, workforce,
and economic development system. Additionally, departments and agencies impacting career readiness will continue tracking metrics for targeted wealth generation.

Oklahoma launched OklahomaWorks.gov to serve as the state’s comprehensive platform and interactive labor market tool for a broad audience, including job seekers, employers, workforce partners, and policy makers. The site includes information on job openings, labor market data, degree and credential requirements, and available education and training resources. Departments and agencies impacting career readiness will continue tracking metrics for targeted wealth generation.

**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.

The team has been a cohesive unit since Governor Fallin recognized 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. 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. Most of the local areas are in the process of building partnerships to accomplish their version of the utopian system and require guidance from this team; discovering they feel very comfortable requesting assistance from their peers representing their agency.

One of the major hurdles they identified at this point is the Memorandum of Understanding at a state and local level addressing service delivery and resource sharing. Under the new law the requirements will change from the past documents and definitions will have to be created specific to our state. For example, the MOU documents in the past have not been as effective or binding as hoped and we are exploring possibilities around requiring MOU contracts instead for more impact. Resource and cost sharing creates a culture of distrust and possessiveness when it comes to the negotiating tables. However, Partners are attempting to make this a win/win for all and keep all stakeholders involved. The WIOA law required we have viable processes in place to address cost and resource sharing and this team has established pilots to address infrastructure/cost sharing and have engaged voluntary involvement of State Agency Directors and Chief Financial State Agency Officers.
The WIOA also requires local planning regions to write local and regional plans. The sub-committee is actively working on draft guidance for these plans 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.

The workforce system being designed will be the springboard to success for Oklahoma’s business and job seekers, helping Oklahoma reach its strategic vision that Oklahoma’s workforce development system increases profitability for businesses and increases income for all Oklahomans.

**Access for All Initiative**

Oklahoma is focused on accessibility for all jobseekers, businesses and employer’s work sites throughout Oklahoma; Governor Mary Fallin implemented the Oklahoma Works Initiative focusing on Education and Training for Tomorrow’s Jobs. The 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 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 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 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.

**Youth**

Oklahoma is aiming at ways of getting the most out of education programs while intermingling the programs into industry standards as the basis of all goals and ensuring that partner resources and practices are accessible and shared.

We are committed to providing youth with skills and tools necessary for successful participation in education and training programs, resulting in credentials and/or degrees and employment in careers in high demand sectors.

The Governor's Council for Workforce and Economic Development's Youth Committee was established to identify and address youth workforce issues. The current state of Oklahoma youth population is constantly scanned to ensure advancement for the purpose of developing a statewide plan in support of youth and a communication infrastructure that will inform and engage all stakeholders. This includes dropout prevention for youth 14 and above (14-21) and recovery strategies for those disengaged youth (16-24) years of age.

The State Workforce Youth Programs committee consists of various state agency representatives, juvenile court judges, Job Corps., non-profit groups specializing in youth issues, private sector representatives, and youth participants in various state and federal programs. The Committee provides recommendations on policy and performance for the development and implementation of WIOA youth funded programs statewide, and creates an Oklahoma workforce strategy for youth that aligns with youth initiatives and provides common solutions that coordinate with the state’s economic goals building wealth creation for all Oklahomans.

Since educational attainment among youth and adults is a critical component of workforce development, the State Workforce Youth Programs committee, working with the Governor’s Council, will establish and measure targets for educational attainment in Oklahoma. One of the primary goals for the State Workforce Youth committee will be developing strategy to increase the target numbers. Initial targets may include: percentage of Oklahomans completing 8th grade; percentage of Oklahomans attaining a high school diploma or High School Equivalency; percentage of Oklahomans attaining an associate degree or industry-recognized credential/certificate; percentage of Oklahomans attaining a bachelor’s degree.

All youth activities focus on developing Oklahoma’s youth to meet the demands of Oklahoma business. This philosophy includes emphasis on increasing the high school graduation rate so that Oklahoma has the highest rate in the nation, expansion of early childhood education, increasing the number of postsecondary graduates in the state, and introducing youth, educators, and parents to Oklahoma’s targeted industry sectors (ecosystems), the skills needed, and the career pathways and opportunities available. This vision requires facilitating and modeling meaningful youth involvement and creating system-wide solutions by aligning workforce development, education, youth-serve agencies and nonprofits, and business to improve opportunities and the quality of life for Oklahoma’s youth.
The Oklahoma State Workforce Youth Programs committee promotes youth development by facilitating the collaboration and alignment of statewide and local services that are of the highest quality and responsive to the needs of all youth.
V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that—

1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts; Yes

2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State boards and local boards, such as data on board membership and minutes; Yes

3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs; Yes

4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating 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 will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3); Yes

7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable; Yes

8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program; Yes

9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs; Yes
10. The State has a One-Stop certification policy that ensures the physical and programmatic accessibility of all One-Stop centers with the Americans with Disabilities Act of 1990 (ADA); Yes

11. Service providers have a referral process in place for directing Veterans with Significant 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

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

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

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

A. ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

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

Oklahoma Governor Mary Fallin designated four planning regions identified as Central, Northeast, Western and Southeast that are comprised of the eight Oklahoma local workforce development areas.

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, the regional Key Economic Network collaborative business leader sessions 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. In addition, Governor Fallin ensured that each area would have 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. Please note, although under WIOA Workforce Investment Boards became Workforce Development Boards, our local areas are still indicated as WIB because that is their legal entity.

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 three (3) Workforce Development Areas:
Eastern Workforce Development Board, Northeast Oklahoma Workforce Development Board, Workforce Tulsa
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:

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:

Local Workforce Development Areas (Seven)
Central Oklahoma Workforce Development Area
In 2015 the Central Oklahoma Workforce Development Area’s (WDA) population was 1,387,706. The Central WDA is composed of the following counties: Canadian, Cleveland, Logan, Oklahoma, Hughes, Lincoln, Okfuskee, Pottawatomie, Seminole.

Eastern Oklahoma Workforce Development Area
The Eastern Oklahoma Workforce Development Area is composed of the following counties: Adair, Cherokee, McIntosh, Muskogee, Okmulgee, Sequoyah, and Wagoner. The Eastern WDA’s population was 317,818 in 2015.

Northeast Oklahoma Workforce Development Area
In 2015 the Northeast Workforce Development Area’s population was 282,284. The Northeast WDA is composed of the following counties: Craig, Delaware, Mayes, Nowata, Ottawa, Rogers and Washington.
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 2015, the Western Oklahoma WDA’s population was 432,282.

South Central Oklahoma Workforce Development Area

In 2015 South Central Workforce Development Area’s population was 311,747. 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 2015 the Southern Oklahoma Workforce Development Area’s population was 407,547. 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.

Tulsa Area Oklahoma Workforce Development Area

In 2015 the Tulsa Oklahoma Workforce Development Area's population was 770,870. The Tulsa WDA is composed of the following counties: Creek, Osage, Pawnee and Tulsa.

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

The Oklahoma process to identify and designate local planning areas is outlined in Oklahoma Policy OWDI 02-2015- Local Area Initial Designation Process. This policy was developed to comply with The Workforce and Innovation and Opportunity Act (WIOA). WIOA mandates that the Oklahoma Governor’s Council for Workforce and Economic Development (GCWED) (or “State Board”) assists the Governor in initial designation of Workforce Areas, in accordance with Section 106.

The Governor of Oklahoma designates local workforce development areas within the State:

(i) Through consultation with the State Board; and

(ii) After consultation with chief local elected officials and after consideration of comments received through the public comment process as described in Section 102(b)(2)(E)(iii)(II).

WIOA further states that the considerations should include the following:

(i) The extent to which the areas are consistent with the labor market areas in the State;
(ii) The extent to which the areas are consistent with regional economic development areas in the State; and

(iii) The extent to which the areas have available the Federal and non-Federal resources necessary to effectively administer activities under subtitle B and other applicable provisions of the Act, including whether the areas have the appropriate education and training providers, such as institutions of higher education and area career and technical education schools.

Initial Local Area Designation

As stated in WIOA section 106, the Oklahoma Governor approved the requests for initial designation by any local area if, during Program Years (PYs) 2012 and 2013, the local area:

(1) was designated as a local area under WIA;

(2) performed successfully; and

(3) sustained fiscal integrity.

Initial designation is effective July 1, 2015 through June 30, 2017. Local areas must apply for initial designation using the process included in Oklahoma Workforce Development Issuance (OWDI) 02-2015, Local Area Initial Designation Policy, found on the Oklahoma Works website with all other statewide policies. Included in this policy are applications for initial designation and for modified designation. Local areas that would like to modify their current geographical boundaries are eligible to apply under their new structure using the modified area application.

Subsequent designation will be effective July 1, 2017. Therefore, during the initial designation period, local areas should be planning and preparing to meet the WIOA requirements for subsequent designation [i.e., perform successfully, sustain fiscal integrity, and in the case of a local area in the planning region, meet the regional planning requirements in WIOA section 106(c)(1)]. Additionally, local areas should be preparing to meet the new Office of Management of Budget (OMB) Omni-Circular regulations which apply to new awards and additional funding (funding increments) to existing awards made after December 26, 2014, (i.e., the youth allocations beginning April 1, 2015, and all subsequent allocations).

DEFINITIONS:

Performed Successfully - A local area has achieved at least 80 percent of their local performance goal on each performance measure for PYs 2012 and 2013.

Sustained Fiscal Integrity - 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).]

DESIGNATION:

WIOA requires that existing federally recognized workforce areas are designated during the first two program years, which is referred to as Initial Designation, and again after the first two program years, which is referred to as Subsequent Designation. Units of general local government that desire to become new or new modified local workforce area should follow the WIOA Designation for New Areas requirements within OWDI 02-2015.

A. INITIAL WIOA DESIGNATION FOR EXISTING REGIONS: Existing workforce regions operating in accordance with the Workforce Investment Act of 1998 may request initial designation as a Local Workforce Development Area if they have performed successfully and sustained fiscal integrity. An area seeking initial designation must address the following:


2. The completed application must include evidence that the area, in program years 2012 and 2013, met or exceeded the agreed upon adjusted levels of performance for the Common Measures, as defined by existing performance agreements, and was not subject to the sanctions process resulting from missing the same measure two years in a row.

3. Provide assurance that during program years 2012 or 2013, the U.S. Secretary of Labor, or the State in place of the Secretary, has not made a formal determination that the grant recipient or administrative entity for the local area has misexpended funds due to willful disregard, gross negligence, or failure to comply with accepted standards of administration.

4. Provide evidence that the area, in program years 2012 and 2013, was committed to providing quality service through continuous improvement efforts and implemented plans that supported sector partnerships or career pathways; or enhanced services to employers or outreach efforts to the local community. Progress reports submitted to the Oklahoma Office of Workforce Development (OOWD) on annual plans for the years will serve as sufficient data.

The Oklahoma Office of Workforce Development (OOWD) would recommend approval to the Governor of a local area’s request that satisfies these requirements in accordance with WIOA Section 106(b)(2). Initial designation as a local area will remain valid until June 30, 2017.
B. WIOA DESIGNATION FOR NEW AREAS: Any unit of general local government may request designation as a Local Workforce Development Area under WIOA. Modified Local Area Designations for Initial Designation will only become effective on July 1 of the next program year. In order for designation to be approved for the start of the next program year, the following steps and timeline must be met.

1. A Modified Local Area Application must be submitted to the Oklahoma Office of Workforce Development (OOWD) no later than February 15, 2016. The OOWD will work with the requesting area to determine the deadline for the full request.

2. The application must clearly outline the circumstances for the request of designation.

3. The application must also address and explain how the following criteria are met:
   a. Consistency with natural labor market areas
   b. Consistency with regional economic development areas
   c. Existence of education and training providers, such as institutions of higher education and career and technical education schools in the area.

Once a completed application was 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.

The CLEO was notified in writing by July 30, 2015 regarding the approval or denial of its initial designation application. If approved, the initial designation will be effective July 1, 2015 through June 30, 2017. If denied, the CLEO may contest the decision using the appeal process below.

Oklahoma’s nine local workforce development areas were offered the opportunity to apply for initial designation. Four local workforce development areas qualified for Initial Designation. These four areas included Tulsa Workforce Development Area, Northeast Workforce Development Area, South Central Workforce Development Area, and Southwest Workforce Development Area.

Those areas that did not meet the criteria were given the conditional designation for one year ending June 30, 2016 and would be assessed by OOWD September 1, 2016. They were charged with meeting the assurances outlined in the conditional designation. These areas included Central Oklahoma Workforce Development Board, Northwestern, Eastern Workforce Development Board, Southern Workforce Development Board and East Central Workforce Investment Development Board. Please note, although under WIOA Workforce Investment Boards became Workforce Development Boards, our local areas are still indicated as WIB because that is their legal entity.

Oklahoma added a qualification of population of 200,000 to achieve initial designation.

The East Central Workforce Investment Development Board did not meet the population nor the performance requirements and will request to combine with Central Oklahoma Workforce Development Board to form a new area. Southwest Workforce Development
Board did not meet the population requirement but were given initial designation through June 30, 2017 because all other performance measures were met.

**PLANNING REGION DEVELOPMENT**

Oklahoma Governor Mary Fallin designated four planning regions identified as Central, Northeast, Western and Southeast that are comprised of the then nine, now eight, Oklahoma local workforce development areas. The Oklahoma Planning Regions were developed with input from the local elected officials and stakeholders through the nine public meetings that were held in 2015 in the Oklahoma cities of Atoka, Claremore, Lawton, Muskogee, Tulsa, Oklahoma City, Seminole, Woodward, and Weatherford. At these statewide meetings comments were gathered and the process for determining the planning regions was presented as proposed under WIOA. Contributions were incorporated in the development of the regions and provided essential guidance for the Governor's consideration for planning area designation. Input was received from the Oklahoma Employment Security Commission, Oklahoma Department of Career and Technology Education, and the Oklahoma Department of Rehabilitation Services, the regional Key Economic Network collaborative business leader sessions 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. In addition, Governor Fallin ensured that each area would have sufficient federal and non-federal funding and appropriate education and training providers to administer regional activity.

The Governor identified planning regions within Oklahoma and has submitted them to the U.S. Department of Labor in accordance with Section 106 of WIOA. Guidance for the framework of the regional plan will be issued in the near future from the Oklahoma Office of Workforce Development.

As the state implements WIOA aligned with Oklahoma Works, it is vital that more dollars are available and used for direct training. By creating planning regions that share administrative costs among local areas, more resources can be prioritized towards training individuals for the state's most in-demand occupations, thereby enhancing our efforts in building wealth-creation for all Oklahomans and providing the qualified workforce businesses need to meet current demand.

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

An area or areas seeking to be designated as a Local Workforce Development Area, which has requested but has been denied its request for initial designation as a Local Area, may appeal the decision to the Governor’s Council for Workforce and Economic Development, Workforce System Oversight Committee (WSOC) and request a hearing by the following process:

384. An appeal and request for a hearing must be mailed to the (WSOC) within 20 calendar days from the mailing date of the notice of denial of initial designation.
385. The appeal must be in writing and contain a specific statement of the grounds upon which the appeal is sought and, must state the reasons why the appellant should be initially designated.

386. Within five (5) calendar days of the receipt of the appeal, the WSOC will contact the appellant to schedule a hearing date. The hearing will be scheduled within five (5) calendar days.

387. The WSOC will conduct the appeal hearing process and provide a written decision to the appellant no later than five (5) calendar days after the hearing. The approval or denial will be sent as a recommendation to the Governor.

388. The final decision rests with the Governor.

Appeal of Workforce System Oversight Committee Decision: An area seeking to be designated as a Local Workforce Development Area, which has requested and has been denied its request for initial or subsequent designation by the WSOC, may also appeal the denial to the U.S. Department of Labor. [WIOA Section 106 (b)(5)] This second level of appeal must be sent within 14 days to:

Assistant Secretary of Employment and Training U.S. Department of Labor 200 Constitutional Avenue, N.W. Washington, DC 20210

A copy of the appeal must also be provided to the: ETA Regional Administrator U.S. Department of Labor 525 S. Griffin Street Dallas, TX 75202

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

As described in OWDI 24-2017, Change 1 located on the oklahomaworks.gov website, 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 relating to determinations for infrastructure funding is a modified version of the complaint and grievance procedures found in OWDI 16-2017.

Within five business days from the notification of contributions under the State Funding Mechanism (SFM), appeals may be sent to the OOWD by email or mail. Contents of the Appeal must contain the following information:

- Full name, telephone number, mailing address, and email address of the complainant;
- Full name, telephone number, mailing address, and email address of the respondent (in this case, the State is the respondent on behalf of the Governor);
- Full names, telephone numbers, mailing addresses, and email addresses of persons who may have knowledge of the facts related to the appeal;
- 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:
  - There is jurisdiction over the appeal;
  - The appeal was timely filed;
The appeal has merit, i.e., whether the allegations, if true, would violate any provisions of WIOA.

- Provisions of WIOA, the WIOA regulations, grant or other agreements under WIOA believed to have been violated;
- The remedy sought by the complainant; and,
- Signature of the complainant, or his or her authorized representative.

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.

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 the OOWD.

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.

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.
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.

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.

2. STATEWIDE ACTIVITIES

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

The Oklahoma 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 (OWDIIs) and formal memos that are posted online on the Oklahoma Works website at www.oklahomaworks.gov/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.

The Workforce Innovation and Opportunity Act provides new opportunities for use of funds to support integrated workforce activities across the state. Oklahoma will follow all applicable Federal regulations and guidance pertaining to the use of each individual funding source while allowing limited amount of funding for statewide initiatives at the discretion of the Governor. Funding will be primarily used in the support and development of strong regional sector strategies. Also, planning regions that share administrative costs will allow more resources to be prioritized toward training individuals for the state’s most in-demand occupations enhancing wealth-creation for all Oklahomans.
System governance policies and guidance are being 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.

Guidance policy for system and regional implementation of WIOA was released in 2016 and 2017. Policies included MOUs and infrastructure funding agreements. When released, all policies will are located on the Oklahoma Works website.

OOWD is continuing to issue new policies and update old policies to be in full compliance with WIOA. Policies issued thus far under WIOA include Local Area Initial Designation Process, Local Workforce Development Board Two-Year Certification Process, Workforce Innovation and Opportunity Act Youth Title I Program, the Eligible Training Provider List Policy, Conditional Designation, Process for Identifying Workforce Planning Regions, Governor's Council for Workforce and Economic Development Policy Issuance Process, and Local Elected Official (LEO) Consortium Agreement. WIA policies remain in effect until updated or rescinded. However, forthcoming policies on system guidance and use of state funds are forthcoming, and will be posted with all other policies at www.oklahomaworks.gov/policy-center.

B. DESCRIBE HOW THE STATE INTENDS TO USE GOVERNOR’S SET ASIDE FUNDING. DESCRIBE HOW THE STATE WILL UTILIZE RAPID RESPONSE FUNDS TO RESPOND TO LAYOFFS AND PLANT CLOSINGS AND COORDINATE SERVICES TO QUICKLY AID COMPANIES AND THEIR AFFECTED WORKERS. STATES ALSO SHOULD DESCRIBE ANY LAYOFF AVERSION STRATEGIES THEY HAVE IMPLEMENTED TO ADDRESS AT RISK COMPANIES AND WORKERS

The 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. Over the past two years, 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 as 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.

Oklahoma Works: The Governor’s set aside funds have also been used to develop and expand the Oklahoma Works Initiative. This initiative is the Governor’s vision for workforce across the state. Oklahoma Works brings all of the state’s workforce resources together, connecting employers, employees and job-seekers to information and programs that help build Oklahoma’s workforce and generate wealth for Oklahomans and Oklahoma’s economy.
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 the educations Oklahomans are receiving starting at a young age. 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 Governor’s Association, the National Association of State Workforce Boards, and the National Association of Workforce Boards.

Over the past two years, 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 allocated to local workforce boards. Rapid Response funds may be used by local workforce boards through application for emergency funding as needed for specific layoff events.

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 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 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:

- **Oklahoma Works Rapid Response staff** monitor news feeds, maintain relationships with business and industry across the state, and touch base with workforce teams and economic developers at the local level for information related to Oklahoma companies that may be in distress. When companies are identified, contact is made with the company and/or local economic development officials to offer support and needed services.

- **Local Workforce Development Boards (LWDBs)** have strong relationships with local economic development staff and the companies in their area. These relationships sometimes allow the LWDB to become aware of challenges a company is experiencing and provides an opportunity to offer layoff aversion assistance.

- **Oklahoma Employment Security Commission (OESC)** - Local Oklahoma Works Centers often hear about companies in their area that may be struggling. Working with local and/or state economic developers allows for proactive efforts to avert potential layoffs.

- **Oklahoma Department of Commerce** - Rural Development Specialists (RDSs) live and work in their assigned areas across the state. They call on companies, provide resource referrals as needed, and build relationships with the companies. When companies experience difficulties, they often turn to the RDSs, who bring in a variety of resources to help solve problems. The Commerce Research Team provides research services for companies as needed. For example, a company in rural Oklahoma was having supply chain issues. The Commerce research team pulled together information and resources to help the company find additional/alternative supply chain resources. Without that assistance, layoffs may have been necessary. Proactive communications and call trips to corporate headquarters of Oklahoma companies, often by the Governor, help Oklahoma know of any issues corporate offices see at the local level. Issues can then be addressed effectively.

- **Oklahoma’s Career and Technology Education system (CareerTech)** consisting 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.

- **The Oklahoma Bid Assistance Network**, a part of the CareerTech system, provides marketing and technical assistance to companies bidding on federal, state, local, and tribal government projects.
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.

C. IN ADDITION, DESCRIBE THE STATE POLICIES AND PROCEDURES TO PROVIDE RAPID RESPONSES IN CASES OF NATURAL DISASTERS INCLUDING COORDINATION WITH FEMA AND OTHER ENTITIES.

Oklahoma is no stranger to natural disasters in recent years including devastating tornadoes, wildfires, and ice storms.

In the event of a natural disaster or other calamity, Rapid Response will work with the Oklahoma Department of Emergency Management and FEMA; local Oklahoma Works One-Stop Centers, local Workforce Development Boards; Chief Elected Officials; Chambers of Commerce; Economic development organizations; Labor and industry organizations; the USDOL, and affected employers to get a clear understanding of the situation and make plans to assist affected employers and workers as needed, including applying for available federal funding. As needed, additional information and processing services and staffing will be provided.

Key to this operation is communications with those affected. Updated information related to transition and re-employment services will be posted on the Oklahoma Works and the OESC websites.

Accomplishments

- The OOWD continues to strengthen relationships with economic development organizations across the state in relation to Rapid Response.
- Oklahoma Department of Commerce (ODOC) and Oklahoma City Chamber of Commerce

419. In 2017, we focused on further relationship building between OOWD and ODOC’s Rural Development Specialists and the OKC Chamber. Convenings focused on an overview of Rapid Response events and on Layoff Aversion strategies. While we already had strong relationships and notify them of layoffs, current and future discussions on alignment to possibly avoid a layoff or minimize the effect of a layoff will help strengthen our strategies.

420. OOWD also worked with ODOC’s business recruitment staff to strengthen relationships in 2017. When layoffs in certain occupations were occurring, we worked with ODOC to make connections with a new company locating in the state. As a result, a number of people avoided unemployment. In one example, maintenance employees from an Oklahoma City manufacturing facility were hired by a newly located company in Durant, Oklahoma.

- Oklahoma’s Rapid Response Handbook, *Tools and Resources for Transitioning to Your Next Job*, was updated in 2017 to reflect changes in administration and transition from WIA to WIOA. Developed in partnership with the Oklahoma Employment Security Commission (OESC), the Handbook is available in both English and Spanish. Short videos, also available in English and Spanish, used in
Rapid Response events along with the Handbook, are also being updated. The approach of using a short video and then walking participants through the content in the Handbook has proven to be effective.

- In February 2018, the OOWD will host a workshop on Business Services to strengthen Oklahoma’s regional partnerships for business services. The workshop will offer a Peer-to-Peer learning opportunity. Sponsored by USDOL. Ken Messina, Business Services/Rapid Response Manager at the Massachusetts Executive Office of Labor and Workforce Development, will share lessons learned when Massachusetts revamped their Rapid Response approach and practices.

D. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) TO WORKER GROUPS ON Whose behalf a TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED. (SECTION 134(A)(2)(A).) THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE TRADE-AFFECTED WORKERS IN THE GROUPS IDENTIFIED IN THE TAA PETITIONS WITH AN ACCURATE UNDERSTANDING OF THE PROVISION OF TAA BENEFITS AND SERVICES IN SUCH A WAY THAT THEY ARE TRANSPARENT TO THE TRADE-AFFECTED DISLOCATED WORKER APPLYING FOR THEM (TRADE ACT SEC. 221(A)(2)(A) AND SEC. 225; GOVERNOR-SECRETARY AGREEMENT). DESCRIBE HOW THE STATE WILL USE FUNDS THAT HAVE BEEN RESERVED FOR RAPID RESPONSE TO PROVIDE SERVICES FOR EVERY WORKER GROUP THAT FILES A TAA PETITION.

In the case of a possible TAA situation, employees at Oklahoma Works Centers and at the Oklahoma Employment Security Commission (OESC) provide information and advice to employers and employees. If TAA status has been approved before the layoff, informational brochures are provided to affected workers at Rapid Response events. TAA petitions are often filed by Oklahoma Works Center personnel on behalf of the affected employees at the time of the layoff. If approved for TAA, the state TAA Coordinator mails notifications to each affected employee, discussing the approved petition and indicating the steps needed to take to take advantage of the TAA benefits.

**Early Intervention**

OESC manages Oklahoma’s TAA program and all TAA petitions are filed through that agency. OESC’s involvement with the state’s Rapid Response Team ensures that when TAA petitions are filed, the team is notified immediately and can spring into action to assist the employers and workers affected.

**Co-Enrollment, Assessments, and Employer-Driven Skills Development**

Oklahoma Works one-stop center staff often dual enroll dislocated workers/TAA applicants. All applicants seeking services under the TAA program are referred to the Dislocated Worker program for career services. The total cost of training is paid for by TAA funds, Dislocated Worker funds, or a combination of both. Consolidation and collaboration among functions (functional integration) in Oklahoma Works centers enables seamless, efficient service delivery.

Center staff members use a variety of assessment tools as well as labor market data from EMSI and OKJobMatch.com, the state’s online labor exchange tool, to determine an
individual worker’s skill level, the high-demand occupations in the area, and where the two
might meet for successful employment.

Further, the Governor’s Council has long embraced sector strategies as a way to ensure that
the skills being developed across the state meet the needs of employers within specific
locales, regions, and industries.

B. ADULT AND DISLOCA TED WORKER PROGRAM REQUIREMENTS

1. WORK-BASED TRAINING MODELS

If the State is utilizing work-based training models (e.g. On-the-job training, Incumbent
Worker training, Transitional Jobs, and Customized Training) as part of its training strategy
and these strategies are not already discussed in other sections of the plan, describe the
State’s strategies for how these models ensure high quality training for both the participant
and the employer.

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.

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 take into account
the quality of the employer-provided training and advancement opportunities. For example,
if the OJT contract is for an in-demand occupation and will lead to an industry recognized
credential. 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,
benefitting 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 recently updated 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 a variety of 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.

Local Workforce Development Boards do not currently utilize WIOA Customized Training and Incumbent Worker Training as training strategies. However, the Oklahoma Department of Career and Technology Education (ODCTE) offers Incumbent Worker Training under their Training for Existing Industry (TEI) Initiative. Services provided under TEI include:

- Training in new computerized manufacturing applications;
- Training for new product lines or company expansions that do not qualify for Training for Industry (TIP) funding;
- Upgrade training for supervisors and front line managers;
- Training for existing Workers to move to other positions; and
- Upgrade training for basic or technical skills.

Additionally, ODCTE’s Training for Industry Program (TIP) provides customized start-up training for many sectors of industry. Services provided include:

- Job analysis;
- Training needs assessment;
- Pre-employment training;
- Instructor costs;
- Instructional materials and
- Training supplies.

TEI and TIP are provided statewide through Oklahoma’s system of 59 technology center campuses.

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. How RA is incorporated into Oklahoma’s workforce strategies is addressed in VI(b)(2) of this document.

2. REGISTERED APPRENTICESHIP

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., job center staff taking applications and conducting assessments).

Oklahoma’s incorporation of Registered Apprenticeship (RA) as a training strategy and the alignment of RA with workforce policies are addressed in this section.
Registered Apprenticeship Strategies

A work-based learning goal, known as "Earn and Learn Oklahoma," was established as a strategy to increase the number of apprenticeships and other work-based learning opportunities. Established by Executive Order, "Earn and Learn" set a goal for the generation of 20,000 quality work-based learning opportunities in the state by the year 2020. As part of the Earn and Learn Oklahoma initiative established by the Governor, RA enables Oklahoma to prioritize education and training resources to support placement into high demand occupations, and supports employers to provide the hands-on training needed to build the skilled workforce their businesses need to succeed.

RA is also aligned with the Governor's Oklahoma Works and Launch Oklahoma Initiatives, and the Career Pathways, Youth, Healthcare Workforce Committees of the Governor's Council for Workforce and Economic Development.

Additionally, the Oklahoma Office of Workforce Development (OOWD) received a $200,000 ApprenticeshipUSA Apprenticeship Accelerator grant from the U.S. Department of Labor in 2016 to expand and diversify apprenticeship opportunities in Oklahoma. Since that time, 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, including internships and apprenticeships. These collaborations are in sectors that did not previously have such opportunities or are in businesses that did not previously offer them.

The main strategy of Oklahoma's ApprenticeshipUSA Accelerator Grant is to focus on creating and expanding RA opportunities within the state's wealth-generating ecosystems: Aerospace and Defense; Agriculture and Biosciences; Energy; Information and Financial Services; and Transportation and Distribution, as well as the complementary ecosystems that help to expand wealth in Oklahoma's economy: Construction, Health Care, and Education.

The inclusion of subject matter experts such as the Oklahoma Department of Career and Technology Education (ODCTE), the Oklahoma Manufacturing Alliance, the Oklahoma Center for the Advancement of Science and Technology and other established Oklahoma Works partners, including established apprenticeship programs, helped the State build upon existing strategies to expand and diversify Registered Apprenticeship (RA) as a viable workforce development strategy in Oklahoma.

Strategies for expansion and diversification also include outreach to specific industry sectors where there is potential for growth in occupations related to Healthcare, Advanced Manufacturing, and Information Technology (IT), as well as to underserved populations such as women, individuals with disabilities, formerly incarcerated individuals, minorities, veterans, and out-of-school youth.

Apprenticeship pilots continue to be a successful strategy for the expansion and diversification of Apprenticeship programs. One leading example of Oklahoma's efforts to expand the boundaries of apprenticeship in Oklahoma is the recently created Dell, Inc. apprenticeship. This apprenticeship program was the result of a pilot coordinated with a community college, a charter school, the employer sponsor and Oklahoma Office of Workforce Development. As a part of this work, Dell’s program recruits high school seniors and trains them to work as help desk technicians. This program represents the state's first
information technology apprenticeship as well as its first youth apprenticeship program. Dell recently launched Oklahoma’s first registered youth apprenticeship program for high school seniors working as help desk technicians. Additional RA pilot programs are being planned for the IT industry and healthcare industry.

The State has implemented the use of Apprenticeship Ambassadors and Key Economic Networks (KENs) Champions to promote the RA initiative. Apprenticeship Ambassadors are subject matter experts from existing apprenticeship programs who aid in outreach efforts and provide technical assistance to businesses interested in creating RA programs. KENs are designed to bring together regional business leaders, educators, private organizations, and workforce partner staff to identify solutions to local to local workforce challenges. Each KEN is led by a business representative selected by the governor, referred to as a KEN Champion.

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.

In 2017, the Central Workforce Development Area became the to first to utilize individual training accounts (ITAs) for participants to receive training in a pre-apprenticeship program. Collaboration between OOWD, the Bricklayers and Allied Craftworkers Local, the Central Workforce Board, and the contracted service provider resulted in an agreement to utilize individual training accounts (ITAs) for entry into the Union’s RA program. This strategy has expanded to the Tulsa Workforce Development Area, where it is currently in the development stage. The original concept of providing upfront classroom training as a “pre-apprenticeship” to determine which trainees are capable of moving on to a three-year RA program is being re-evaluated to better accommodate the needs of employers and apprentices. Instead of the provision of a stipend for the upfront classroom requirement, ongoing Saturday classes will be conducted, allowing apprentices to earn wages while receiving the on-the-job training during the week. Oklahoma hopes to expand upon the model to utilize ITAs for RA statewide.

WIOA Title I funds have also been utilized to provide supportive services in the form of books, tools and equipment such as steel-toed boots for participants in the related technical instruction (RTI) portion of RA programs.

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 RA training: utilizing an OJT contract with an RA program for providing both the RTI and OJY instruction; a combination of an ITA to cover the RTI along with an OJT contract to cover the on-the-job portions of the RA. 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.

3. TRAINING PROVIDER ELIGIBILITY PROCEDURE
Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

Oklahoma’s eligible training provider list (ETPL) is designed to maximize customer choice and ensure all priority groups under WIOA are served. The ETPL is administered in a manner to ensure significant numbers of competent providers offering a wide variety of training programs and occupational choices are available to customers. Oklahoma’s ETPL is disseminated electronically through OKJobMatch.com.

Oklahoma’s process for determining eligible training providers and programs for adults, dislocated workers, and out-of-school youth aged 16-24 includes identifying training providers whose performance qualifies them to receive WIOA training funds through Individual Training Accounts (ITAs). An eligible training provider (ETP) is the only type of entity that may receive funding for training services through an ITA. The following types of entities may qualify as ETPs:

- Institutions of higher education that provide programs leading to recognized postsecondary credentials;
- Registered Apprenticeship program sponsors, per 50 Stat. 664, chapter 663 l 29 U.S.C. 50 et seq.; and
- Other public or private providers of programs of training services, which may include joint labor-management organizations, as well as eligible providers of adult education and literacy activities under Title II if such activities are provided in combination with occupational skills training.

Local workforce development board (LWDBs) and/or service providers assist individuals in the selection of training programs that are directly linked to employment opportunities in their local area. Each local board must establish, maintain, review and update annually a list of existing or emerging occupations that are determined by the LWDB to:

- be part of the sector of the economy that has a high potential for sustained demand or growth in the local area;
- target industry clusters within the local area;
- support economic growth priorities; and
- address industry-specific shortages.

Based upon the initial or continued eligibility criteria listed later in this section, training providers in these occupations may be approved to provide programs of training that prepare individuals for the existing or emerging occupations determined by the LWDB.

On-the-job training, internships, paid or unpaid work experience, and transitional employment are not required to be listed on the ETPL.

**Eligible training provider list procedure**

Training providers must apply for inclusion on the statewide ETPL through Oklahoma’s virtual case management system, OKJobMatch.com. 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 for programs that meet local criteria and the requirements stipulated in State policy.

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. Registered Apprenticeship (RA) programs are exempt from performance and reporting-related requirements in order to enable these evidence-based programs to be placed on the statewide ETPL with minimal burden. These programs have already gone through a rigorous assessment as part of the registration process with the U.S. Department of Labor, Office of Apprenticeship (DOLETA/OA). 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.

**Initial Eligibility**

New training providers may seek initial eligibility electronically through the Local Workforce Development Areas (LWDAs) and, if approved by OOWD, will remain eligible and listed on the ETPL for only 1 year for a particular program. After the first year, if the provider/program meets subsequent approval requirements, continued eligibility will be reviewed every two years. The criteria and information requirements established by the OOWD require a provider and/or program not previously eligible under this section to provide verifiable information pertaining to:

- A detailed description of each program of training to be offered;
- Program-specific performance related to the indicators of performance;
- A description of the provider's partnership with at least one business, if such partnership exist;
- Other factors that indicate high-quality training services, such as accreditation, registration and/or state licensing requirements specific to the industry, and whether the training leads to recognized postsecondary credential;
- Information addressing the alignment of the training services with in-demand industry sectors and occupations, to the extent practicable, as evidenced by the Occupational Information Network Standard Occupation Classification (O*NET-SOC) code(s); and
- Program-specific data for the All Student population, i.e., the general public who attended the training program for the most recent performance year, including:
  - the number of persons who entered and attended at least one day of training during the performance year; the number of persons who completed the training program during the performance year;
  - the number who obtained training-related employment upon completion of the training program during the performance year; and
  - the average hourly wage at employment placement.

In consultation with ODCTE, OSRHE, OBPVs, and regional leaders, the state plans to strengthen the ETPL by requiring ETPs to upload documents to OKJobMatch that verify accreditation, registration and/or state licensing requirements specific to the industry. The
ability for ETPs to upload documents to OKJobMatch was just made available in December of 2017. This process will help to ensure quality training providers and programs for individuals seeking training.

**Continued (Subsequent) Eligibility**

To meet the subsequent eligibility determination requirements, the following factors must be considered by Local Workforce Development Boards (LWDBs) when electronically recommending to OOWD subsequent eligibility approval to the State:

- The specific economic, geographic, and demographic factors in the workforce areas in which providers seeking eligibility are located;
- The characteristics of the population served by providers seeking eligibility, including the demonstrated difficulties in serving such populations, where applicable;
- The degree to which training programs relate to in-demand industry sectors and occupations within the state;
- The performance of a provider of program(s) of training services as outlined by the Oklahoma Office of Workforce Development;
- The program cost of training services; and
- The involvement of employers in the establishment of skill requirements for the training program.

After the first year, if the program meets subsequent approval requirements, continued eligibility is reviewed every two years. Program-specific performance (number participated, number completed, and number employed after leaving the program) pertaining to the All Student population must, at a minimum be entered biennially by the training provider for each training program. Local workforce board may require training providers to update information more frequently, but not more than once per year. Additionally, WIOA performance data must be entered by the local board, for a minimum of one year.

Additional factors that must be considered by local workforce boards prior to the electronic submission of training programs to the State for subsequent approval, including:

- 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, based on established benchmarks for program completion, entered employment, and wages at employment placement;
- 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.
Note: A re-evaluation of the State’s current performance benchmarks for ETPL eligibility is planned within the next two years. Eligible Training Providers (ETPs), with the exception of registered apprenticeships, are required to submit annual performance reports. The results will apply to both WIOA and All Student populations. The mechanism for collecting this information is not currently in place. The State will set required performance levels when additional reporting clarification and reporting templates are available from the USDOL.

The performance requirements for eligible training providers, with the exception of Registered Apprenticeships, are:

- Entered Employment Rate: The percentage of program participants who are in unsubsidized employment in the second quarter after exit from the program;
- Employment Retention Rate: The percentage of program participants who are in unsubsidized employment in the fourth quarter after exit; and
- Median Earnings: The median earnings of program participants who are in unsubsidized employment during the second quarter after exit.

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 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, or substantially violate requirements of WIOA law 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 development, maintenance and dissemination of the State list of providers and programs;
- Ensuring programs meet the eligibility criteria and performance levels established by the State;
- Verifying the accuracy of submitted information; removing programs that do not meet established program criteria or performance levels; ensuring performance and cost information relating to each provider is available to the public;
- Finalizing approval for providers and programs recommended by the Local Workforce Development Boards (LWDB);
- Ensuring Registered Apprenticeship program sponsors are contacted to voice their willingness to be part of the ETPL (with assistance from DOLETA/OA);
- Verifying the registration status of Registered Apprenticeship programs on at least a biennial basis; and
- Ensuring new Registered Apprenticeship programs are placed on the ETPL in a timely manner.

Local Workforce Board ETPL Responsibilities

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

- Identification of in-demand sectors or occupations for the local area using relevant labor market information;
- Reviewing new and subsequent training providers and programs of training services to ensure accurate eligibility criteria and performance information has been provided prior to submission to the OOWD for final approval;
- Recommending the termination of providers due to the provider’s submission of inaccurate eligibility and/or performance information;
- Working with the State to ensure that sufficient numbers of providers of training services have the expertise in assisting individuals with disabilities and training providers are available to assist adults in need of adult education and literacy activities; and
- Making recommendations to OOWD for approval or denial of providers and/or programs based on the local area’s demand occupation information and the program’s performance.

With the exception of Registered Apprenticeships, LWDBs may require additional information and/or set higher levels of performance for providers to become or remain eligible for provider services in their particular area. If a Local Board establishes minimum standards in local policy, the Local Board may direct the removal of a provider’s program from the eligible programs in that local area for failure to meet established criteria. The appeal process outlined in this section must be followed for rejected training providers or those providers removed for cause.
4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR 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 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.

The Southern Workforce Development Board has determined a fourth priority population group for individuals residing within the Choctaw Nation of Oklahoma, established as a Promise Zone in 2014. The 12 county area is considered a highly impoverished area. At this time, the Southern Board is the only LWDB that has established a fourth priority population group.

Local areas are required to establish written policies and procedures to ensure priority for the populations described above. As part of regular monitoring and oversight responsibilities, OOWD ensures that all local areas have developed and implemented such policies. OOWD’s requirement for comprehensive program notes and substantive documentation uploads to the virtual case management system (OKJobMatch) also corroborates local adherence to both State and local policies.

The Governor’s Oversight and Monitoring Plan, released as an Oklahoma Workforce Development Issuance in August of 2017, details standards for State and local oversight and monitoring.

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

Oklahoma allows local boards the flexibility to transfer up to 100 percent of the funds allocated to the local area for adult and dislocated worker employment and training
services between the Adult Program and DLW Program as prescribed in WIOA section 133 and OWDI 07-2016, Change 1. To ensure that local areas reserve sufficient Adult and Dislocated Worker funds for the Program year, criteria for the transfer of funds between the programs includes factors such as:

- local data comprised of the number of TAA petitions and Rapid Response events in the local area;
- anticipated layoffs based on local economic conditions; and
- overall program performance.

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

Transfer of Funds Request forms have been developed by the State for use by the local areas. Separate forms will be required to document the Participant Plan and the Budget Plan.

Local boards will be required to submit the Transfer of Funds Requests to the State and must receive an affirmative reply from the OOWD prior to moving funds between the Adult and Dislocated Worker programs.

C. YOUTH PROGRAM REQUIREMENTS

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.*

* Sec. 102(b)(2)(D)(i)(V)

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:

- 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, Pre-Apprenticeship Programs, 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 that have successfully served similar populations of youth with state, federal or other limited funds.
- We will continue our relationship with the Central Oklahoma Juvenile Center (COJC). As a result of the initial relationship built and promising outcomes demonstrated in the work experience pilot, COJC and Central Oklahoma Workforce Innovation Board are optimistic that moving forward under the current administration, we will see a significant increase in activities as strategy meetings resurfaced in 2017.
- The Oklahoma Office of Workforce Development has developed relationships with the Boys and Girls Club Alliance and will continue our strategy meetings that evolved to eventually include local input for the sake of building 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.

- The Oklahoma Office of Workforce Development submitted the Youth Cohort Challenge Application in support of Central Oklahoma Workforce Innovation Board and its selected group of partnering organizations including: Dynamic Workforce Solutions, Oklahoma County Juvenile Bureau, Oklahoma City Housing Authority, and the Office of Juvenile Affairs. The U.S. Department of Labor Employment and Training Administration selected the state partnership along with seven other partnerships nationwide to participate in the Administration’s Youth Cohort Challenge - What Does It Take to Effectively Engage and Retain Out-of-School Youth Throughout the Program Lifespan? The cohort team will focus on the challenges faced in out-of-school youth engagement and retention. This results of the effort will assist the state of Oklahoma in greatly improving its statewide youth engagement efforts and influence the Department of Labor’s thinking on this issue as well.

According to data provided by the US Department of Education Approximately 16% of Oklahoma school aged children or a little more than 90,000 youth have disabilities as compared to 12.9% of school aged youth nationwide. Assuming for planning purposes that the youth are evenly distributed between grades 1 - 12, there are approximately 30,000 eligible WIOA youth in our high schools with a documented disability. As our state’s vocational rehabilitation agency must set aside at least 15 percent of their funding to provide transition services to youth with disabilities to ensure high school completion the state sees an opportunity for partnerships between Vocational Rehabilitation. 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 industry recognized occupational skills credentials.
- Reinforcing the needs for dropout recovery programs, and;
- Reiterating the need to incentivize participation and monumental achievements of the youth for retention purposes

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.*

* Sec. 102(b)(2)(D)(i)(I)

During annual monitoring the state will require the local areas to submit documentation describing how the 14 program elements are being implemented. The state will also include a sample of youth RFP’s and contracts in their annual monitoring to assure that the 14 elements were included in the program design and framework and are available to all youth in the WIOA program. There is a section in our youth program monitoring tool that specifically asks our local boards for a description of how the following program elements are being implemented and we request a list of the entities providing the elements and the services available at least annual in accordance with monitoring requirements:

- 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 a 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 ENTER OR COMPLETE AN EDUCATIONAL 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.

"REQUIRING ADDITIONAL ASSISTANCE TO ENTER OR COMPLETE AN EDUCATIONAL PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT" CRITERION FOR OUT-OF-SCHOOL YOUTH.

- 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 underperforming schools listed as a priority or targeted intervention school on the Oklahoma State Department of Education website http://sde.ok.gov/sde/priority-schools;
A youth between 18-24 years of age with a pattern of Poor Work History. Poor work history includes non-recurring employment income and sporadic employment.

“REQUIRING ADDITIONAL ASSISTANCE TO COMPLETE AN EDUCATION PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT” CRITERION FOR IN-SCHOOL YOUTH.”

A low-income individual who requires additional assistance to complete an educational program 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 underperforming school listed as a priority or targeted intervention school on the Oklahoma State Department of Education website http://sde.ok.gov/sde/priority-schools;
- A youth between 18-21 years of age with a pattern of poor work history. Poor work history includes non-recurring employment income, and sporadic employment.


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.

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.

D. SINGLE-AREA STATE REQUIREMENTS
In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must include—

1. ANY COMMENTS FROM THE PUBLIC COMMENT PERIOD THAT REPRESENT DISAGREEMENT WITH THE PLAN. (WIOA SECTION 108(D)(3).)

2. THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS, AS DETERMINED BY THE GOVERNOR, IF DIFFERENT FROM THAT FOR THE STATE. (WIOA SECTION 108(B)(15).)

3. A DESCRIPTION OF THE TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES AND SUCCESSFUL MODELS, INCLUDING FOR YOUTH WITH DISABILITIES. (WIOA SECTION 108(B)(9).)

Not applicable


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)

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

1. IDENTIFIES THE STATUTORY OR REGULATORY REQUIREMENTS FOR WHICH A WAIVER IS REQUESTED AND THE GOALS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, INTENDS TO ACHIEVE AS A RESULT OF THE WAIVER AND HOW THOSE GOALS RELATE TO THE UNIFIED OR COMBINED STATE PLAN;

2. DESCRIBES THE ACTIONS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, HAS UNDERTAKEN TO REMOVE STATE OR LOCAL STATUTORY OR REGULATORY BARRIERS;

3. DESCRIBES THE GOALS OF THE WAIVER AND THE EXPECTED PROGRAMMATIC OUTCOMES IF THE REQUEST IS GRANTED;

4. DESCRIBES HOW THE WAIVER WILL ALIGN WITH THE DEPARTMENT'S POLICY PRIORITIES, SUCH AS:
   - SUPPORTING EMPLOYER ENGAGEMENT;
   - CONNECTING EDUCATION AND TRAINING STRATEGIES;
   - SUPPORTING WORK-BASED LEARNING;
   - IMPROVING JOB AND CAREER RESULTS, AND
   - OTHER GUIDANCE ISSUED BY THE DEPARTMENT.

5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER, INCLUDING HOW THE WAIVER WILL IMPACT SERVICES FOR DISADVANTAGED POPULATIONS OR INDIVIDUALS WITH MULTIPLE BARRIERS TO EMPLOYMENT; AND

6. DESCRIBES THE PROCESSES USED TO:
   - MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
   - PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;
   - PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;
   - ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.
7. THE SECRETARY MAY REQUIRE THAT STATES PROVIDE THE MOST RECENT DATA AVAILABLE ABOUT THE OUTCOMES OF THE EXISTING WAIVER IN CASES WHERE THE STATE SEeks RENEWAL OF A PREVIOUSLY APPROVED WAIVER;

Oklahoma is not submitting any waiver request as part of this modification. Waiver requests may be submitted as part of future modifications to this plan upon publication of the WIOA final regulations, issuance of federal guidance, or as the need arises.

TITLE I-B ASSURANCES

The State Plan must include assurances that:

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 disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I.     Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report. Yes

11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3); Yes

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

All program-specific requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

**A. EMPLOYMENT SERVICE PROFESSIONAL STAFF DEVELOPMENT.**

1. **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.**

   The Oklahoma Employment Security Commission (OESC) supports the professional development of staff. As an agency, a dedicated Training, Policy and Staff development team was formed to meet the training demands of the workforce system, managers, and staff. This team provides relevant training to OESC staff and system partners at times. The training consists of national and state demands, system and procedure matters, and other service delivery development opportunities.

   With the implementation of WIOA along with other training and development needs, OESC has developed a training schedule for OESC staff in the workforce centers to ensure high quality services are appropriately delivered to workforce customers. Staff also take advantage of learning opportunities provided through annual partner conferences organized by the Oklahoma Workforce Association (OWA), a group composed of state and local system partners, as well as information provided through the USDOL. We will continue to review and strengthen our product box in order for staff to provide the best service the first time.

2. **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 Centers. 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 Center staff to assist with identification of potential UI eligibility issues and referral to UI for adjudication:


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. 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 Center Staff and One-Stop Operators and/or Managers provide supplemental training to an integrated staff through weekly Center meetings. This detailed approach fosters an environment for knowledge growth and continues to keep Oklahoma focused on service delivery as defined by WIOA.

B. EXPLAIN HOW THE STATE WILL PROVIDE INFORMATION AND MEANINGFUL ASSISTANCE TO INDIVIDUALS REQUESTING ASSISTANCE IN FILING A CLAIM FOR UNEMPLOYMENT COMPENSATION THROUGH ONE-STOP CENTERS, AS REQUIRED BY WIOA AS A CAREER SERVICE.

Oklahoma has thirty (35) Centers - 18 Comprehensive centers, 12 Affiliate Centers, and 5 Specialized 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 has two options for filing a UI claim: by telephone or online. All individuals requiring staff-assisted service in filing an online claim can come into a Center where there are trained, knowledgeable, integrated staff members available to sit down and walk the customer through the online claims filing process. There are also telephones available in quiet areas for those who wish to file by phone. Staff members have received comprehensive training and are able to answer questions regarding the initial claims process as well as any questions about claimant rights and responsibilities. In addition, a detailed, illustrated online claims system user’s manual is available at all Centers in the Resource room.

For those claimants who are Limited English Proficient, the online claims system has a language translator. Center staff can assist the customer in accessing the translator or use
language lines to assist such individuals during the claims filing process. When needed, for those individuals who are Deaf or Hard of Hearing, TTY services are available.

The services available to claimants do not end with the filing of the initial claim. Centers have supports and resources available at any time and for all other parts of the claims process: sending documents to UI, speaking with Inquiry or Adjudication, filing for weekly benefits, and participating in Appeals hearings. The rapid reemployment of claimants is also a focal point for Oklahoma. As the need for additional access increases, enhanced technology, such as online chat, will be considered to meet the UI expertise access requirements of WIOA. The Workforce system will continue to evaluate the upfront process for referring claimants to UI experts to ensure that questions specific to an individual’s claim are referred to the appropriate staff. In addition to assistance with the work registration and work search requirements, State Merit staff provide one of two reemployment services tracks (Reemployment Services and Eligibility Assessment and 50% Eligibility Review Interview) at designated times during the claim series depending on the claimant’s circumstance.

C. DESCRIBE THE STATE’S STRATEGY FOR PROVIDING REEMPLOYMENT ASSISTANCE TO UNEMPLOYMENT INSURANCE CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS.

In addition to other career services in the Oklahoma Works centers, Oklahoma provides two reemployment services tracks to help Unemployment Insurance (UI) claimants and/or unemployed individuals return to work more quickly: Reemployment Services and Eligibility Assessment and 50% Eligibility Review Interview.

Reemployment Services and Eligibility Assessment (RESEA)

RESEA is an individualized process consisting of an orientation to the Center 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, 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.

50% Eligibility Review Interview (ERI)

The 50% Eligibility Review Interview (ERI) is delivered in a group process consisting of information on available services, work search review, expansion of work search efforts, and the provision of job referrals. This group is intended to be a triage type, informational session designed to serve the masses; taking far less time than its Reemployment Services counterpart, RESEA. The ERI is conducted with claimants in demand occupations who possess the skills and experience to return to work, often in the same or similar occupation. These claimants are equipped with additional reemployment strategies and tools, and are expected to return to work more quickly.
D. DESCRIBE HOW THE STATE WILL USE W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS APPROPRIATE, INCLUDING THE FOLLOWING:

1. COORDINATION OF AND PROVISION OF LABOR EXCHANGE SERVICES FOR UI CLAIMANTS AS REQUIRED BY THE WAGNER-PEYSER ACT;

As described in the previous responses, the OESC complies with this requirement to use Wagner-Peyser funds to support UI claimants. In Oklahoma both the Unemployment Insurance Program and Wagner-Peyser are administered by the same agency, OESC. Labor exchange services are provided to all customers accessing the workforce centers by Wagner-Peyser staff. In fact, there is a special emphasis placed on serving UI claimants to help connect them back to work as quickly as possible.

2. REGISTRATION OF UI CLAIMANTS WITH THE STATE’S EMPLOYMENT SERVICE IF REQUIRED BY STATE LAW;

In Oklahoma, it is required that claimants register for work in the state labor exchange system within seven days of filing their initial claim. For those filing their initial claim online, the system automatically directs them to the labor exchange system to register for work before the completion of the initial claim. For those claimants filing by telephone, they are requested to 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.

3. ADMINISTRATION OF THE WORK TEST FOR THE STATE UNEMPLOYMENT COMPENSATION SYSTEM, INCLUDING MAKING ELIGIBILITY ASSESSMENTS (FOR REFERRAL TO UI ADJUDICATION, IF NEEDED), AND PROVIDING JOB FINDING AND PLACEMENT SERVICES FOR UI CLAIMANTS; AND

Oklahoma allows two ways for claimants to file an unemployment claim, by telephone and through the Oklahoma Network Initial Claims (ONIC). Through both of these processes, potential eligibility issues are identified based upon the claimants’ response to questions during the application for benefits process. Reemployment of claimants continues to be at the forefront for Oklahoma. OESC has modified and enhanced services to claimants to ensure the registration for work requirement is met along with required attendance 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 Centers, resume assistance, job referrals, job search workshops, work search review and access to skills based training. Regardless of the career path the claimant chooses, the end result continues to be reemployment.

4. PROVISION OF REFERRALS TO AND APPLICATION ASSISTANCE FOR TRAINING AND EDUCATION PROGRAMS AND RESOURCES.

Within the Oklahoma workforce development system, known as Oklahoma Works, is a network of Centers or One-Stop offices where employment, education and training providers 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 which 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.

As mention briefly in VI.b, Oklahoma provides two reemployment services tracks to help Unemployment Insurance (UI) claimants return to work more quickly: Reemployment Services and Eligibility Assessment and 50% Eligibility Review Interview.

**Reemployment Services and Eligibility Assessment (RESEA)**

RESEA is an individualized process consisting of an orientation to the Center 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, 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 will serve 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.

**50% Eligibility Review Interview (ERI)**
The 50% Eligibility Review Interview (ERI) is delivered in a group process consisting of information on available services, work search review, expansion of work search efforts, and the provision of job referrals. This group is intended to be a triage type, informational session designed to serve the masses; taking far less time than its Reemployment Services counterpart, RESEA. The ERI is conducted with claimants in demand occupations who possess the skills and experience to return to work, often in the same or similar occupation. These claimants are equipped with additional reemployment strategies and tools, and are expected to return to work more quickly.

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--

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.

In Oklahoma, 2% of all farms and ranches hire migrant workers. A total of 858 migrant workers were reported by the 2012 USDA, Census of Agriculture for Oklahoma. Other sources give estimates as high as approximately 8,000 MSFWs in the state, not including their family members. The discrepancy of available data makes it difficult to identify true number of MSFWs in the state and where they are located. It is anticipated that the number of migrant workers will continue to range between 800-1,000 workers in the future for Oklahoma. However, data from O*NET Online, gives an average increase of 1-3% per year for all MSFWs, so there may possibly be a slight increase in numbers.

Oklahoma continues to seek identification of and contact with the changing face of its migrant and seasonal farmworker (MSFW) population. The increasing changes in agricultural based technology and mechanization, along with the second worst drought period in Oklahoma history, seem to have contributed to a leveling off of our MSFW population. However, despite these factors, Oklahoma continues to be one of the top agricultural states and recognizes the MSFW population who does work and live here.

Assessing the unique needs of the MSFW population in Oklahoma, like many other states, presents several challenges. The MSFW is difficult to identify, share information with or locate. Despite high agricultural activity within the state, it appears many MSFWs pass through Oklahoma for seasonal work and continue to other states, looking at Oklahoma as merely a “stopover”. While it is believed the MSFW population will remain stable for the coming years, the introduction of more organic and “natural” based agricultural products may lead to an increase in their population.

Typical comments from the field represent the MSFW as someone who is here to work, earn their money and move to the next location. They most generally are sending a significant portion of their pay to their families and must bring in a paycheck. They have no time for training for other employment, unless they can no longer work in the fields due to age, health or other factors. Employers, obviously, want to keep these valued workers and would be reluctant to encourage training or employment outside of meeting the agricultural needs they have. Housing, if provided, is a place to eat, sleep and shower. Minimum requirements
established by DOL-ETA and OSHA are met. If housing is not provided by the employer, a migrant worker is left to find his/her own housing.

Other factors such as healthcare, schooling for children, employer requirements, rights, insurance, health & safety information, availability of adequate work clothing and transportation, among others, are needs of the MSFWs. Lack of identification and contact makes it difficult to know how great the needs are. MSFWs are rarely provided transportation to be able to come to town or a career center. Career centers are not available when they are not working. The needed information must be brought to the MSFW in the fields, communities, or frequented businesses/services they utilize.

A. AN ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE MEANS: 1) IDENTIFYING THE TOP FIVE LABOR-INTENSIVE CROPS, THE MONTHS OF HEAVY ACTIVITY, AND THE GEOGRAPHIC AREA OF PRIME ACTIVITY; 2) SUMMARIZE THE AGRICULTURAL EMPLOYERS’ NEEDS IN THE STATE (I.E. ARE THEY PREDOMINANTLY HIRING LOCAL OR FOREIGN WORKERS, ARE THEY EXPRESSING THAT THERE IS A SCARCITY IN THE AGRICULTURAL WORKFORCE); AND 3) IDENTIFYING ANY ECONOMIC, NATURAL, OR OTHER FACTORS THAT ARE AFFECTING AGRICULTURE IN THE STATE OR ANY PROJECTED FACTORS THAT WILL AFFECT AGRICULTURE IN THE STATE.

The following information regarding Oklahoma agriculture was obtained from the 2015 Oklahoma Agricultural Statistics, issued cooperatively by the National Agricultural Statistics Service and the Oklahoma Department of Agriculture, Food and Forestry. (This is a summary of data through 2014.)

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

Most major crops in Oklahoma are no longer considered labor-intensive with the exception of watermelon. Increased mechanization/technology, herbicides and genetically superior seeds/plants have continued to greatly reduce the need for vast numbers of laborers as in years past. However, the specialty crops/livestock related products and vegetables/produce for Farmers Markets are increasingly providing labor-intense work opportunities. Others have pursued some of these new ventures such as: Grass-fed dairy/beef, free range chicken and revitalization of sheep for meat, wool and wool products. The leading agricultural activities in Oklahoma are:

<table>
<thead>
<tr>
<th></th>
<th>Farms</th>
<th>Sales ($1,000)</th>
<th>Percent of Total Sales</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cattle and calves</td>
<td>41,492</td>
<td>$3,402,919</td>
<td>47.7%</td>
</tr>
<tr>
<td>Grains, oilseeds, dry beans, and dry peas</td>
<td>10,854</td>
<td>$1,283,997</td>
<td>18%</td>
</tr>
<tr>
<td>Poultry and eggs</td>
<td>3,790</td>
<td>$961,302</td>
<td>13.5%</td>
</tr>
<tr>
<td>Hogs and pigs</td>
<td>1,466</td>
<td>$656,407</td>
<td>9.2%</td>
</tr>
<tr>
<td>Other crops and hay</td>
<td>20,987</td>
<td>$270,641</td>
<td>3.8%</td>
</tr>
<tr>
<td>Crop Type</td>
<td>Farms</td>
<td>Sales ($1,000)</td>
<td>Percent of Total Sales</td>
</tr>
<tr>
<td>--------------------------------------------------------------------------</td>
<td>-------</td>
<td>----------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>Nursery, green house, floriculture, and sod</td>
<td>327</td>
<td>$208,109</td>
<td>2.9%</td>
</tr>
<tr>
<td>Milk from cows</td>
<td>296</td>
<td>$164,341</td>
<td>2.3%</td>
</tr>
<tr>
<td>Cotton and cottonseed</td>
<td>451</td>
<td>$51,851</td>
<td>0.7%</td>
</tr>
<tr>
<td>Horses, ponies, mules, burros, and donkeys</td>
<td>5,585</td>
<td>$42,166</td>
<td>0.6%</td>
</tr>
<tr>
<td>Fruits, tree nuts, and berries</td>
<td>1,831</td>
<td>$41,373</td>
<td>0.6%</td>
</tr>
<tr>
<td>Vegetables, melons, potatoes, and sweet potatoes</td>
<td>444</td>
<td>$19,333</td>
<td>0.3%</td>
</tr>
<tr>
<td>Sheep, goats, wool, mohair, and milk</td>
<td>3,543</td>
<td>$13,227</td>
<td>0.2%</td>
</tr>
<tr>
<td>Other animals and other animal products</td>
<td>1,164</td>
<td>$12,382</td>
<td>0.2%</td>
</tr>
<tr>
<td>Aquaculture</td>
<td>27</td>
<td>$1,271</td>
<td>0.01</td>
</tr>
<tr>
<td>Cut Christmas trees and short rotation woody crops</td>
<td>31</td>
<td>$265</td>
<td>0.003</td>
</tr>
<tr>
<td>Tobacco</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Totals:</td>
<td>80,245</td>
<td>$7,129,584</td>
<td>100%</td>
</tr>
</tbody>
</table>

The table below details the heaviest crop activity related to planting and harvesting during the 12 month calendar year beginning with January and going through December. The frost free period is from mid-April until the 3rd week of October.

<table>
<thead>
<tr>
<th>Crop Type</th>
<th>Planting</th>
<th>Harvest</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Winter Wheat:</strong></td>
<td>Early Sep to Early Nov</td>
<td>June to Early July</td>
</tr>
<tr>
<td><strong>Canola:</strong></td>
<td>Early Sep to Early Oct</td>
<td>Mid May through June</td>
</tr>
<tr>
<td><strong>Spring Oats:</strong></td>
<td>Mid Feb to March</td>
<td>June to Mid-July</td>
</tr>
<tr>
<td><strong>Corn:</strong></td>
<td>Late March to Mid-May</td>
<td>Mid Aug to Late Oct</td>
</tr>
<tr>
<td><strong>Soybeans:</strong></td>
<td>Mid-April to Mid-July</td>
<td>Mid Sep through Nov</td>
</tr>
<tr>
<td><strong>Sorghum:</strong></td>
<td>Mid-April to Mid-July</td>
<td>Mid Sep through Nov</td>
</tr>
<tr>
<td><strong>Peanuts:</strong></td>
<td>Late April to Mid-June</td>
<td>Oct to Nov</td>
</tr>
<tr>
<td><strong>Sunflowers:</strong></td>
<td>May to July</td>
<td>Aug to Mid Dec</td>
</tr>
<tr>
<td><strong>Cotton:</strong></td>
<td>May to Late June</td>
<td>Oct through Dec</td>
</tr>
<tr>
<td><strong>Alfalfa Hay:</strong></td>
<td>Late April to Mid Oct</td>
<td></td>
</tr>
</tbody>
</table>

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.

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):

A review of various sources found no viable information for MSFW labor involvement and/or shortages in Oklahoma agriculture. The 2012 USDA, Census of Agriculture at the state level did provide some general information. • 18,108 Oklahoma farms hired 51,119 workers in 2012. Of those, 189 total farms reported total migrant workers of 858. A further breakout reveals 49 farms reporting only contract MSFW labor of 104 and 140 farms reporting 754 migrant workers with hired labor. • Trends from the 2002, 2007 & 2012 census present the following: Total farms utilizing migrant workers have shown 379 farms in 2002, 919 farms in 2007 and only 189 farms in 2012. A drop off of farms utilizing this type of worker is found to be 79% in the past 5 years. Despite the migrant worker numbers, total farms with hired farm labor, in general, have continued to grow. * 17,700 farms/50,134 workers in 2002 * 16,826 farms/48,644 workers in 2007 * 18,108 farms/51,119 workers in 2012 This would seem to indicate more local labor being on the payroll versus migrant workers being brought in to work. The next Agricultural Census for 2017 is currently being collected, so 2012 census data continues to be most recent for many items. However, Oklahoma 2016 Agricultural Statistics indicates Oklahoma carries a national rank of 4th in the number of farms.

3) Identifying any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State:

Oklahoma is a state of many climates and ecosystems. It is found in the Great Plains, is geographically centered within the 48 contiguous states and is the 20th largest state at 69,903 square miles. Ecosystems range from dry, arid plains to subtropical forests and mountains, having more ecological regions than any other state. Elevations range from 4,368 feet above sea level in the western panhandle to 289 feet above sea level in the southeast portion of the state. The mean elevation of the Oklahoma is considered to be 1,300 feet above sea level. Because of Oklahoma’s location between regions of varying prevailing winds, its climate, winds, temperatures and weather, it makes for extreme variance in a locality’s weather from day-to-day and extreme change between areas in close proximity. Because of this, an average of 62 tornados a year, drought, flood, extreme temperature variations and unpredictable weather in general, Oklahoma farmers deal with very unpredictable seasons, making for constantly changing plans for raising and changing crops and livestock in an attempt to turn a profit. Average annual precipitation ranges from 18” over 59 days in the western portion of the state to 51.9” over 96 days in the eastern portion of the state. Frost free periods in the western portions are typically about 143 days and 185 days in the eastern portion. The following information regarding Oklahoma agriculture was obtained from the 2013 and 2016 Oklahoma Agricultural Statistics, issued cooperatively by the National Agricultural Statistics Service and the Oklahoma Department of Agriculture, Food and Forestry.
<table>
<thead>
<tr>
<th></th>
<th>2013</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harvested acres of principal crops:</td>
<td>8,160,300</td>
<td>8,196,000</td>
</tr>
<tr>
<td>Value of 17 top commodities:</td>
<td>$6,701 billion</td>
<td>$6,849 billion</td>
</tr>
<tr>
<td>Farms:</td>
<td>85,500</td>
<td>78,000</td>
</tr>
<tr>
<td>Land in farms:</td>
<td>34,800,000 acres</td>
<td>34,200,000 acres</td>
</tr>
<tr>
<td>Average farm size:</td>
<td>407 acres</td>
<td>438 acres</td>
</tr>
</tbody>
</table>

OK National Agricultural Rankings for Crop Production:

<table>
<thead>
<tr>
<th></th>
<th>2013</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rye</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Canola, Winter Wheat</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>All Wheat, Pecans, &amp; All Other Hay</td>
<td>4</td>
<td>All Other Hay 3 All Wheat, Pecans 5</td>
</tr>
<tr>
<td>All Hay, Sorghum, Grain</td>
<td>6</td>
<td>4</td>
</tr>
<tr>
<td>Peanuts, Sunflower &amp; Sorghum, Silage</td>
<td>9</td>
<td>Sorghum, Silage 6 Peanuts 10 Sunflower 9</td>
</tr>
<tr>
<td>Watermelons</td>
<td>14</td>
<td>14</td>
</tr>
<tr>
<td>All Cotton &amp; Cottonseed</td>
<td>15</td>
<td>All Cotton 7 All Cottonseed 8</td>
</tr>
<tr>
<td>Oats</td>
<td>25</td>
<td>27</td>
</tr>
<tr>
<td>Soybeans</td>
<td>27</td>
<td>22</td>
</tr>
<tr>
<td>Corn, Grain &amp; Alfalfa Hay</td>
<td>28</td>
<td>Corn 27 Grain &amp; Alfalfa Hay 24</td>
</tr>
<tr>
<td>Corn, Silage</td>
<td>30</td>
<td>36</td>
</tr>
</tbody>
</table>

OK National Agricultural Rankings for Livestock:

<table>
<thead>
<tr>
<th></th>
<th>2013</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beef Cows</td>
<td>4</td>
<td>2</td>
</tr>
<tr>
<td>All Cows, Cattle &amp; Calves</td>
<td>5</td>
<td>All Cows 4 Cattle &amp; Calves 5</td>
</tr>
<tr>
<td>Calf Crop</td>
<td>6</td>
<td>3</td>
</tr>
<tr>
<td>Cattle on Feed</td>
<td>7</td>
<td>9</td>
</tr>
<tr>
<td>Hogs</td>
<td>8</td>
<td>9</td>
</tr>
<tr>
<td>Broiler Production</td>
<td>11</td>
<td>12</td>
</tr>
<tr>
<td>Red Meat Production</td>
<td>14</td>
<td>13</td>
</tr>
</tbody>
</table>
### Preliminary data from USDA, National Agricultural Statistics Service and the Oklahoma Department of Agriculture, Food and Forestry indicate:

Wheat production in 2014 was down 55% from the previous year. Production of row crops during 2014 were mixed compared to the 2013 crop year with corn for grain down 5%, sorghum yields slightly higher, cotton planting up 68% and cotton yield up 75%, soybeans unchanged, canola production 54% less, sunflower production down 38% and peanuts 26% lower. Hay was up 7.55%, pecans were 40% lower and watermelon was up 50%. Livestock related data for 2014 reflected cattle inventory up 300 thousand head; sheep and lambs decreased 6,000 head and hog inventory up 130 thousand head. Overall commercial red meat production was down 8% from 2013. Dairy related numbers found a decrease of 11% for average number of milk cows and total milk production. Poultry data found chickens (except broilers) up 133 thousand birds; egg production was down 34 million and broilers down 800 thousand birds. Record highs in the following commodities were Rye Production (2015), Cotton Yield (2016) and Soybean Production (2016). 2015 cash receipts were up from 2014 on winter wheat, cotton lint, peanuts, pecans, sorghum, gran, cottonseed, rye, watermelons, chicken eggs and chicken (excluding broilers) up 133 thousand birds; egg production was down 34 million and broilers down 800 thousand birds.

Predicting Oklahoma weather in the long term is almost impossible because of the dynamics of various regions influences upon it. It can be said, at the worst point of extreme/exceptional drought and a mild winter, rains did come in June 2014. Reviewing 2014-2015 statistics available, Oklahoma did continue its trend of unpredictable and extreme weather. The Oklahoma Climatology survey reported warmer than usual temperatures and increased precipitation occurred during 2014. 2015 found snow, sleet & freezing rain early and historic rains (almost quadrupling average rainfall), 60 tornadoes, catastrophic flooding and 11 fatalities by May, 2015. The US Drought Monitor showed 59% of the state in drought at the beginning of May and only 3% by the end of the month. The abundance of flooding and cooler temperatures provided a new set of problems for spring of 2015. Flash drought developed in late summer/fall and by the end of 2015 a powerful winter storm December 26-28th provided blizzard, ice storm and winter storms throughout with flash flooding in the eastern portion of the state & high winds throughout. The impact of this 2015 extreme weather on Oklahoma agriculture has not been published. 2016 weather found normal weather early; April warm & dry ending with hail & flooding (7$^{th}$ wettest April in OK history); May - September found average precipitation, hot & humid and

<table>
<thead>
<tr>
<th></th>
<th>2013</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sheep and Lambs</td>
<td>20</td>
<td>28</td>
</tr>
<tr>
<td>All Chickens</td>
<td>25</td>
<td>26</td>
</tr>
<tr>
<td>Eggs</td>
<td>26</td>
<td>28</td>
</tr>
<tr>
<td>Wool Production</td>
<td>28</td>
<td>29</td>
</tr>
<tr>
<td>Milk Production &amp; Milk Cows</td>
<td>30</td>
<td>31</td>
</tr>
<tr>
<td>Newly Added Meat Goats</td>
<td>-</td>
<td>3</td>
</tr>
<tr>
<td>Newly Added Milk Goats</td>
<td>-</td>
<td>20</td>
</tr>
</tbody>
</table>

Preliminary data from USDA, National Agricultural Statistics Service and the Oklahoma Department of Agriculture, Food and Forestry indicate: Wheat production in 2014 was down 55% from the previous year. Production of row crops during 2014 were mixed compared to the 2013 crop year with corn for grain down 5%, sorghum yields slightly higher, cotton planting up 68% and cotton yield up 75%, soybeans unchanged, canola production 54% less, sunflower production down 38% and peanuts 26% lower. Hay was up 7.55%, pecans were 40% lower and watermelon was up 50%. Livestock related data for 2014 reflected cattle inventory up 300 thousand head; sheep and lambs decreased 6,000 head and hog inventory up 130 thousand head. Overall commercial red meat production was down 8% from 2013. Dairy related numbers found a decrease of 11% for average number of milk cows and total milk production. Poultry data found chickens (except broilers) up 133 thousand birds; egg production was down 34 million and broilers down 800 thousand birds. Record highs in the following commodities were Rye Production (2015), Cotton Yield (2016) and Soybean Production (2016). 2015 cash receipts were up from 2014 on winter wheat, cotton lint, peanuts, pecans, sorghum, gran, cottonseed, rye, watermelons, chicken eggs and chicken (excluding broilers) up 133 thousand birds; egg production was down 34 million and broilers down 800 thousand birds.
rain not falling where needed; Oct-Nov experience unseasonably high temperatures (Cool growing season was driest since 1921); December was cold & dry (Coldest weather since Feb 2011).

B. AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS MEANS SUMMARIZING MIGRANT AND SEASONAL FARM WORKER (MSFW) CHARACTERISTICS (INCLUDING IF THEY ARE PREDOMINANTLY FROM CERTAIN COUNTRIES, WHAT LANGUAGE(S) THEY SPEAK, THE APPROXIMATE NUMBER OF MSFWs IN THE STATE DURING PEAK SEASON AND DURING LOW SEASON, AND WHETHER THEY TEND TO BE MIGRANT, SEASONAL, OR YEAR-ROUND FARMWORKERS). THIS INFORMATION MUST TAKE INTO ACCOUNT DATA SUPPLIED BY WIOA SECTION 167 NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANTEES, OTHER MSFW ORGANIZATIONS, EMPLOYER ORGANIZATIONS, AND STATE AND/OR FEDERAL AGENCY DATA SOURCES SUCH AS THE U.S. DEPARTMENT OF AGRICULTURE AND THE U.S. DEPARTMENT OF LABOR (DOL) EMPLOYMENT AND TRAINING ADMINISTRATION.

Oklahoma’s foreign MSFWs primarily are from Mexico and other South American countries. Other foreign MSFWs include South African, Australian/New Zealand, Vietnamese and East European workers. The primary language spoken by MSFWs is Spanish with some MSFWs speaking Vietnamese, Romanian and Afrikaans, with English frequently being a primary or secondary language for Australia/New Zealand and South Africa. Data from 2013-2014 indicates a continuing downward trend for the use of MSFWs in traditional crop production due to unpredictable season & weather factors, continuing improvements and use of agricultural machinery, herbicides, and seeds/plantings. Weather will play a large role in seasonal prep, planting, maintaining, harvesting and finishing of all crops, frequently changing numbers of workers needed onsite from day to day. Weather also will bring long periods waiting on the weather to break, resulting in short bursts of high activity, mostly being completed by local and available workers. From the Oklahoma 2017 Agricultural Statistics, in 2016 (AEWR at $11.15) the hourly rate to workers was: Hired crop workers = $11.40-$11.41; Hired animal workers $11.59-$12.06.

A review of Oklahoma’s Foreign Labor certification program for CY 2015 finds that H-2A posted 40% (223) of their openings during a 3 month period from April to June (our peak season), representing almost half of all positions posted. The remaining 56% (285) positions were spread throughout the rest of the year during our low season. The most recent National Center for Farmworker Health (NCFH) MSFW Enumeration Profiles Study for Oklahoma indicated 8,112 MSFWs (including US workers) in the state. This would indicate that visa workers are not Oklahoma’s primary resource for MSFW employment. The H-2A workers are primarily migrant and seasonal, as would be expected. The NCFH Enumeration study identified 3,391 migrant and 4,721 seasonal workers. It is known that some workers pick up more than 1 temporary agricultural worker position in a year, which could amount to a type of “year-round” farm working, but not with just one employer.

Data from O*Net Online. Reviewing their 10 year - 2014-2024 predictions agricultural positions in Oklahoma will show some growth and some loss: • 45-2091.00 Agricultural Equipment Operators +2% • 45-2092.00 Farmworkers and Laborers, Crop, Nursery, and Greenhouse -8% • 45-2093.00 Farmworkers, Farm, Ranch and Aquacultural Animals +5% • 45-2041.00 Graders and Sorters, Agricultural Products -7%
These numbers could be reflective of employers hiring more permanent workers to maintain their business year-round and dealing with severe/extreme weather factors. A review of DOL ETA 9002 series reports has provided the following data for MSFWs in Oklahoma:

12/31/2012 Total = 65 Participants Entered Employment= 43.9% Employed at 6 months= 75%
12/31/2013 Total = 49 Participants Entered Employment= 67.39% Employed at 6 months= 70.97%
12/31/2014 Total = 48 Participants Entered Employment = 77.27% Employed at 6 months = 68.97%
12/31/2015 Total = 56 Participants Entered Employment= 75% Employed at 6 months = 82.22%
12/31/2016 Total = 26 Participants Entered Employment = 56.67% Employed at 6 months = 45%

These numbers could be reflective of more self-identification as MSFW and/or increased numbers of MSFW not being employed & registering for unemployment or seeking work. It would be anticipated MSFW workers will remain approximately the same. However, since the original publication of this AOP, a change in the definition of MSFWs has resulted in correctly identified MSFWs, under this new definition, being listed in the single digit range. No longer are MSFWs carrying that identifier once they have not worked MSFW seasonal agricultural activities in the past 12 months. This extreme drop-off of recognized MSFWs will probably not reach 20 registrants in OKJobMatch over the next year.

Finally, casual discussion with WIA Section 167 National Farmworker Jobs Program (NJJP) grantee and employers in agriculture during the 2014 Annual Prevailing Wage Survey has presented two additional factors for consideration:

1. Energy and infrastructure related employment in Oklahoma entices away many of the ranchers', farmers and harvesters best workers away. Unable to keep up with these related wages, agricultural workers are reportedly less skilled and less dependable. Several employers report dealing with many who want to work on a day-to-day basis, with no commitment to the job.

2. Another unfortunate reality is that although Oklahoma has made it difficult to hire illegal immigrants through tougher laws and regulations than most states, Oklahoma now has the fastest increase in the nation for people without legal status. According to the Pew Research Center, 75,000 undocumented immigrants (mostly Mexican) call Oklahoma home. Of those, it is very likely a large number are working in agricultural settings, where enforcement of laws and regulations is nearly impossible and they go uncounted. Any activity such as this does and will continue to affect the agricultural worker numbers.

2% of all Oklahoma farms and ranches hire migrant workers. In 2012, a total of 858 migrant workers were reported by the 2012 USDA, Census of Agriculture. It is anticipated the number of migrant workers will range between 800-1,000 workers for the next year. Using data from O*Net online, an average increase of 1-3% per year of all MSFW could be projected. (2018 update: Another item which is creating unreliable data and projections is the current and unpredictable political climate and policies surrounding immigrants of all type. It would have been anticipated that an increase in MSFWs to handle production and collection of “hand” crops would have increased, but unworked fields are reportedly on the increase. Undocumented MSFWs are hiding and moving frequently. Identification of any immigrant worker is seen as a threat and employers continue to protect their good/long-
term MSFWs. Trying to locate & identify MSFWs in Oklahoma has gone from difficult to practically impossible. This will likely result in a further decrease of locating and identifying MSFWs.)

2. OUTREACH ACTIVITIES

The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency’s proposed strategies for:

Oklahoma strives to continue improvement interacting with and providing assistance to our MSFW community. Oklahoma is not designated as a significant MSFW state due to the low percentage of MSFWs identified. Most contact with MSFWs is through our Oklahoma Works Centers when MSFWs register for unemployment or other center services. This typically represents 50 or less registered MSFWs in OKJobMatch. Additional partnerships will provide more sources for dissemination of information about the Oklahoma Employment Security Commission’s (OESC) and other partners’ services, training opportunities, and MSFW rights, health and safety information. Available resources for potential outreach activities include, but are not limited to ORO, OSHA, DOL Wage & Hour, the Oklahoma Department of Human Services, the Oklahoma Department of Education, Oklahoma Department of Agriculture, Workforce Development Boards, Oklahoma Works, and various health, medical and charitable organizations which serve the MSFWs. More specifically, Oklahoma will train and assign state merit center staff who meet the required qualifications for an outreach worker and who are currently working in areas of high MSFW activity. These outreach workers will, upon completion of outreach training, begin locating and contacting MSFWs in their assigned area of the state, as part-time outreach workers. This outreach activity will be revisited a minimum of once a year to review data collected and determine if the number of outreach workers or their locations need to be adjusted. Upon completion of training, the outreach workers will begin identifying MSFW populations, including their locations to provide outreach activities as the first order of priority. The State Monitor Advocate (SMA) will ensure fluid communication of data, information and provision of manpower in a unified manner throughout the state. This would allow various reporting requirements to be met in a more efficient manner. In 2017 registered MSFWs were 25 or less. Oklahoma trained and assigned 3 state merit center, bilingual staff to become outreach workers. These outreach workers have begun to target areas where populations of MSFWs & their families may be found. The progress or issues of Oklahoma’s outreach program will be reviewed in Feb 2018.

A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES.

The OESC and its outreach workers will increase the publicizing of its employment, training and supportive services available at centers by promoting these centers as a viable resource for MSFWs through increased outreach activities. OESC outreach workers will contact those MSFWs not coming into local office where they work or live and will target community based businesses and events in MSFW communities (i.e., shopping center, stores, restaurants, etc...) to reach MSFWs with informational materials about center services and opportunities.
The strategic placement of qualified outreach workers throughout the state is crucial for contacting farmworkers who cannot be reached through normal intake activities at the local centers.

Several proposed outreach activities continue to be in the planning stage or in their infancy at this time. A brief summary of each follows:

- **Limited English Proficiency (LEP) group** - The policy of OESC is to provide quality and timely language assistance services to customers with LEP to ensure meaningful access to programs, services and activities. The LEP program is identifying significant documents, informational materials and other items used on a daily basis in our workforce centers to translate to Spanish or any other native language. Our OKJobMatch database systems allows for a variety of language options. Increased promotion of availability of bilingual staff and translation services are occurring, both within the offices and in the field, through written brochures and posters.

- **Placement of bilingual Oklahoma Works Centers** - OESC has 11 Spanish speaking staff in local offices and various state office positions. Bilingual staff are being placed in high volume offices or units (i.e., call center for unemployment) to assist Spanish speaking customers. • Identification of pertinent groups, organizations and associations involved with the agricultural community. OESC continues to maintain relationships with agencies who may assist or who work specifically with the MSFWs; including, but not limited to: the Oklahoma Works, Oklahoma Department of Education, the U.S. Department of Labor, the Oklahoma Department of Labor, ORO Development Corporation (Section 167 Farmworker Program grant recipient), and the local WIOA Workforce Development Boards. The OESC will continue to work in establishing new alliances with those entities which will be of assistance to us and the provision of services to MSFWs. Additional connections are being sought with OSHA, US Department of Justice, EPA, CDC, and Health & Human Services, as they relate to MSFWs and other agricultural workers. OESC’s SMA continues to identify and reach-out to network with a variety of agricultural-related agencies, both governmental and private. This effort has resulted in the establishment of the Oklahoma Agricultural Outreach Group. (See next bulleted item)

- **Establish networking and some structured communication with these groups, organizations and associations to help to identify ongoing needs and services.** An agricultural outreach group was established in February 2016 with the intent of facilitating an exchange of information regarding services, communication of events, and identifying the needs for each member with regard to working with Oklahoma agricultural employers and workers. Meetings to realize a joint effort with others to locate and assist MSFWs will be attended within the limits of available resources. The OESC plans to be a unifying force for this activity and networking in the future. Identify and provide increased literature and media outreach to the agricultural community. The Oklahoma Agricultural Outreach Group was established and meets quarterly to exchange information, request assistance from each other and discuss common needs and issues. The membership now exceeds 30 members. A smaller sub-group has started identifying areas of the state to have community training/forums for employers, with the first having occurred 11/2017 in southwestern Oklahoma. Additional community based events are being discussed for the benefit of the MSFW and their families.
o Develop MSFW informational packet for workers and for employers summarizing available resources. Early stage planning for an MSFW Handbook and an Agricultural Employment Handbook has begun. A goal of summer, 2017 is planned for the MSFW handbook as a media outreach activity. The goal of summer, 2017 was partially achieved. Packets of informational materials are available to MSFWs and their employers from outreach workers, training, and offices. A new goal for the MSFW Handbook is fall 2018, with an Agricultural Employment Handbook for employers by March 2019. Establish a more visible MSFW State Monitor Advocate internet presence. An Oklahoma State Monitor Advocate webpage was placed on the OESC agency website in January, 2015. In addition to the basic role, items such as agricultural related materials for the worker and employer, links and location of centers and agency/community resources, complaint process, safety and other informational items are now displayed. All SMA, Foreign Labor, MSFW webpages are being reviewed for update by May 2018.

o Provide more extensive training to OESC and partner staffs in Oklahoma Works Centers to better identify MSFWs, their needs and service requirements, and provide informational material to those MSFWs, employers and organizations in their counties served. A desk aid for staff to assist in the proper identification of MSFWs has been discussed, created and distributed. This is a first step in acclimating center staff & partners to more aggressive identification of and assistance to MSFWs. More training on MSFW identification and system issues as related to Oklahoma Works Center staff has occurred (most recently with Dec 2017 complaint training). This is ongoing.

o Market Oklahoma Works Centers as viable assistance centers for the MSFWs. Both flyers and web-based information will be used for this purpose. The OESC webpage currently displays all offices, with information on each. Links to this site will be available in more locations. Handouts will be developed for outreach activities, job fairs or other events. This is occurring through outreach events and field visits. Oklahoma Works Centers now have posters, brochures and reception area marquee information for provision of translation services, along with media identifying available services at centers and resources in the community (English/Spanish). Partnering with the ORO Development Corporation, a current grantee provider of the WIOA Title I Section 167 program and non-profit corporation of the State of Oklahoma will continue to be developed and utilized by our Oklahoma Works Centers. ORO provides employment, training and supportive services to Oklahoma’s MSFWs, often through referral from our LOs. ORO is located in 5 Oklahoma Works Centers and works alongside OESC staff and other partners to provide increased services in the parts of the state with higher concentration of MSFW population. Now located in 4 areas of the state with added outreach workers for each area. SMA continues to be involved in various aspects of ORO activities and planning. Plans to coordinate outreach activities between ORO and OESC have started. ORO continues to be a strong partner with OESC in addressing MSFW needs.

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH WORKERS. TECHNICAL ASSISTANCE MUST INCLUDE TRAININGS, CONFERENCES, ADDITIONAL RESOURCES, AND INCREASED COLLABORATION WITH OTHER ORGANIZATIONS ON TOPICS SUCH AS ONE-STOP CENTER SERVICES (I.E. AVAILABILITY OF REFERRALS
Training for OESC and outreach staff will include training modules that are being developed to address multiple aspects such as: agricultural employer or jobseeker contacts, job order requirements, referrals to posted jobs and all center services, identification of MSFWs, rights, complaints, unemployment insurance and sexual harassment/human trafficking. These modules will address past and current regulatory requirements found in 20 CFR Part 653. This training will be extended to partners, OESC related divisions (including UI) and other agriculturally related agencies and providers as needed. OESC will coordinate with the WIOA Section 167 NFJP recipient with regard to MSFW needs, and to facilitate or provide intensive services and training services. This will be facilitated by a Memorandum of Understanding (MOU). The OESC will continue to engage with other agricultural groups, associations and organizations for the purpose of identifying and assisting MSFWs. OESC continues to maintain relationships with agencies who may assist or who work specifically with the MSFW; included but not limited to the Oklahoma Works, Oklahoma Department of Education, and US and Oklahoma Departments of Labor, ORO Development Corporation (Section 167 Farmworker Program grant recipient), and the local WIOA Workforce Development Boards. Additional connections are being sought with OSHA, US Department of Justice, EPA, CDC, and Health & Human Services, as they relate to MSFWs and other agricultural workers. OESC will work to establish networking and some structured communication with these groups, organizations and associations to help to identify ongoing needs and services.

Training has occurred for Oklahoma Works Centers for most items listed. Outreach Workers attended a USDOL E&T presentation on sexual harassment & human trafficking and plans are for a member of the Oklahoma State Bureau of Investigation (OSBI) to present these and similar topics to all staff by the Summer 2018, as required by regulation. Evaluation as to the effectiveness of this training is presently occurring with retraining of problem areas as quickly as possible. A new MOU with ORO and the SMA, will be developed by August 2018. A previous MOU remains in place and addresses much of the items needed. OESC continues to seek other agencies or groups which can assist in sharing information or facilitating training or assistance. This is ongoing.

Contact with other relevant agencies is planned, including the Red Cross and Catholic Charities for assistance with stranded travelers. Visits with Oklahoma Department of Agriculture, Legal Aid of Oklahoma, the Mexican Consulate and various health related organizations are also planned. There are other plans to become a more active participant in WIOA Board, Area Manager and statewide Oklahoma Works Center meetings. An agricultural based work group has been established. Meetings to realize a joint effort with others to locate and assist MSFWs will be attended within the limits of available resources. Communicate with others the need for agencies/providers sharing a common forum. OESC plans to be a unifying force for this activity and networking in the future.
Contact has been established with Legal Aid of Oklahoma, Oklahoma Department of Agriculture and the Mexican Consulate and they are members of our Agricultural Outreach Group. Other new members include University of Oklahoma ESL Department, Variety Care, OSHA, Oklahoma State Department of Education Migrant student section, and the National Safety Council. Outreach workers attend all Oklahoma Agricultural Group meetings. We continue to pursue, contact and involve other relevant groups.

C. INCREASING OUTREACH WORKER TRAINING AND AWARENESS ACROSS CORE PROGRAMS INCLUDING THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING ON IDENTIFICATION OF UI ELIGIBILITY ISSUES.

As part of the initial outreach worker training and ongoing training modules, outreach workers will become familiar with core elements of partner programs, including the Unemployment Insurance (UI) program and UI eligibility. This training will address items such as eligibility, program services and benefits, resources for additional or more detailed information, application and contact information. Plans are for both this topic of training as well as other outreach related topics, to occur a minimum of once a year, with training on any adjustments, new topics or responsibilities occurring as needed. Training has occurred for outreach workers. Training specific to UI program & UI eligibility has not occurred at this update, but is planned for this year (JUNE 2018).

D. PROVIDING STATE MERIT STAFF OUTREACH WORKERS PROFESSIONAL DEVELOPMENT ACTIVITIES TO ENSURE THEY ARE ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS.

For the continuing training and development of outreach workers, state or national professional development opportunities will be attended by State merit staff outreach workers within the limits of available resources. These continuing training and development opportunities for State merit staff outreach workers will take advantage of statewide WIOA related trainings, employee continuing education and other related training/informational events which will benefit their knowledge and skills. Pertinent national training and development opportunities will be considered as information becomes available. State merit staff outreach workers are being informed of relevant training available at a state, regional or national level. An example of which is attending a national USDOL webinar presented by the National Monitor Advocate. The SMA continues to provide a variety of required and topical training for the outreach workers. The outreach workers are also permanent members of the Agricultural Outreach Group and become aware of many events through these meetings. Budgetary resources are limited for travel & training.

E. COORDINATING OUTREACH EFFORTS WITH NFJP GRANTEES AS WELL AS WITH PUBLIC AND PRIVATE COMMUNITY SERVICE AGENCIES AND MSFW GROUPS.

OESC will continue to coordinate with the WIOA Section 167 NFJP grantee, Oro Development Corporation (ORO), to identify MSFW needs, and to facilitate needed outreach. This effort will be aided by a Memorandum of Understanding (MOU). The OESC will engage with other agricultural groups, associations and organizations for the purpose of identifying and assisting MSFWs. Much of this engagement will continue to occur through our agricultural outreach group. Guidance has been received to develop a new MOU with our
NFJP partner. This should be completed by July 2018. A past MOU remains in place until this is developed.

OESC continues to maintain relationships with agencies who may assist or who work specifically with the MSFW; included but not limited to the Oklahoma Works, Oklahoma Department of Education, and US and Oklahoma Departments of Labor, ORO Development Corporation (Section 167 Farmworker Program grant recipient), and the local WIOA Workforce Development Boards. SMA will contact WDBs in 2018.

OESC continues to work in establishing new alliances with those entities which will be of assistance to us and the provision of services to MSFWs. Additional connections are being sought with OSHA, US Department of Justice, EPA, CDC, and Health & Human Services, as they relate to MSFWs and other agricultural workers. OESC will work to establish networking and some structured communication with these agricultural groups, organizations and associations to help to identify ongoing needs and services.

Contact with other relevant agencies is planned, including the Red Cross and Catholic Charities for assistance with stranded travelers. Visits with Oklahoma Department of Agriculture, Legal Aid of Oklahoma, the Mexican Consulate and various health related organizations are also planned. The SMA and outreach workers will become more active participants in WIOA Board, Area Manager and statewide Oklahoma Works Center meetings. Meetings to realize a joint effort with others to locate and assist MSFWs will be attended within the limits of available resources. Communicating with others the need for agencies/providers sharing a common forum is a priority for Oklahoma. The OESC plans to be a unifying force for this activity and networking opportunity in the coming year. Ongoing development of relationships with a variety of agencies and organizations will continue.

Good progress has been made, as previously noted.

OESC hosted an Oklahoma agricultural outreach group meeting in February 2016. Attending this first meeting were representatives from various U.S. DOL and Oklahoma Departments of Labor divisions, the regional Mexican Consulate, USDA, Oklahoma Department of Agriculture, Food & Forestry, ORO Development Corporation, Oklahoma Employment Security Commission, and an H-2A/H-2B agent. Additional members being sought are some additional sections of the USDA, OSU agricultural researchers & educators, Legal Aid, Farm Bureau, Oklahoma Farmers Union, 4H, FFA, the Oklahoma Health Department, Workforce Development Boards, and the medical community. These meetings are intended to be a joint effort of all agricultural entities within the state to better coordinate, communicate and reach all agriculturally impacted patrons, whatever their position or need. As mentioned previously, this group continues to grow in number of members, focus and benefit to not only its membership, but also to the benefit of agricultural employers and workers, including MSFWs.

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

Describe the State agency’s proposed strategies for:

A. PROVIDING THE FULL RANGE OF EMPLOYMENT AND TRAINING SERVICES TO THE AGRICULTURAL COMMUNITY, BOTH FARMWORKERS AND AGRICULTURAL
EMPLOYERS, THROUGH THE ONE-STOP DELIVERY SYSTEM. THIS INCLUDES:

DXL. HOW CAREER AND TRAINING SERVICES REQUIRED UNDER WIOA TITLE I WILL BE PROVIDED TO MSFWS THROUGH THE ONE-STOP CENTERS;

DXLI. HOW THE STATE SERVES AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH SERVICES.

Oklahoma's strategy for addressing career and training services required under the WIOA Title I provided to MSFWs through the one stop centers includes a variety of programs, services and assistance available at our centers or through partners. Such strategies include:

- Informational flyers and access to computers for online application provided in outreach activities at workforce centers, at cultural/community events and through media outlets (radio) represent the best methods at this time.
- Oklahoma prides itself on taking care of its citizens by whatever means are necessary within available resources. The MSFW, who seeks services through our workforce centers, is provided the same level of services as any other customer who walks through our doors. Center services include access to job postings, referrals and job developments to all types of jobs; training services through WIOA partners; assistance in registering in OKJobMatch; assessments; information on employee rights with MSFW specific rights included; a system for registering complaints; information and referrals to other agencies and providers outside of the centers; labor market information, use of computers, phones and faxes, a variety of workshops, resume assistance and language services.
- The Limited English Proficiency (LEP) program is identifying significant documents, informational materials and other items used on a daily basis in our workforce centers to translate to Spanish. Additionally, translation services, in many languages, are available as needed.
- Oklahoma's OKJobMatch database system allows for a variety of language options. Additionally, there are computers available for online applications, external job search and research.
- Bilingual staffs are located in offices serving those of Hispanic descent. Currently the state has eleven (11) bilingual Spanish-speaking staff employed by OESC and four (4) bilingual Spanish speaking staff employed by ORO in centers where more Spanish-speaking clientele are more likely to visit. No other language group is identified to require the placement of bilingual staff in any other language as translation services are suitable.
- Partnership with the ORO Development Corporation (ORO), a current grantee provider of the WIOA Title I Section 167 program and non-profit corporation of the State of Oklahoma, will continue to be developed and utilized by our workforce centers. ORO provides employment, training and supportive services to Oklahoma's MSFWs, often through referral from our workforce centers. ORO is located in 4 areas of the state and work alongside OESC staff, additional outreach workers, and other partners to provide increased services in the parts of the state with higher
concentration of MSFW population. Co-enrollment of ORO clients into OKJobMatch is being assessed.

- OESC continues to maintain relationships with agencies who may assist or who work specifically with the MSFW; included but not limited to the Oklahoma Works, Oklahoma Department of Education, and US and Oklahoma Departments of Labor. OESC will continue to work in establishing new alliances with those entities which will be of assistance to us and the provision of services to MSFWs.
- Meetings to realize a joint effort with others to locate and assist MSFWs will be attended. OESC plans to be a unifying force for this activity and networking in the future.
- Cooperation between OESC’s Director of Reemployment Services Customer Service Division, WIOA Director and State Monitor Advocate will ensure MSFW needs and services are addressed throughout the State’s Workforce and WDA systems.
- Increased interaction with Workforce Development Boards is anticipated to communicate needs and ensure their commitment to working with the MSFW. Contact with Workforce Development Boards will occur in 2018 by SMA.
- Training for all center staff will include modules on definition and identification of the MSFW, addressment of rights, complaints and potential language services needed, and the Agricultural Recruitment System (ARS) as a means for proper placement of MSFWs in all agricultural jobs, especially those outside of the Foreign Labor Certification (FLC) program’s H-2A and H-2B job orders. Staff will be trained on additional resources for the MSFW and/or employers when handbook(s) are completed. A viewing of a state developed PowerPoint will be required of all new center staff addressing these items and will be available for all OESC staff new hire orientation. Much of the initial training has occurred. Assessment of knowledge gained from this training is in process, with additional training as needed.
- Development of a center practice which requires staff to pursue contact with those MSFWs, who are registered (typically through self-registration) but not engaged in programs or services, to insure they are knowledgeable of what is available to them. Policy and training will be in place by May 2018.
- Outreach workers will take center information and services to the MSFW population unable to come to the centers. Marketing center services as a viable option for MSFWs to encourage them visiting the center in the area they work or live. This has been occurring primarily through events and distribution of informational materials. Outreach worker field visits to MSFW places of employment or communities will continue to be encouraged and planned as locations are identified.
- Agricultural employer services are not only addressed through common employer service at the centers, such as assistance with Federal, State and Local regulatory compliance; skills and proficiency testing; screening of applicants if required or requested; LMI; registration on OKJobMatch which includes job posting and resume search capabilities; information on several incentive programs for hiring targeted populations; and Career Readiness Certification. Agricultural employers specifically receive specialized assistance in filling their job openings through compliant job orders in OKJobMatch. Applicants are informed by Center staff regarding the conditions, duties, pay, etc... of these unique posting and applicants are screened for meeting job requirements before referral to the employer. For farm workers or employers, presentations and technical assistance by outreach workers and/or
The use of the Agricultural Recruitment System (ARS), providing pre-occupancy housing inspections and assisting agents/employers with job posting requirements represents some other services provided. Ongoing. The ARS is currently being updated, with policy & procedures to be completed by April 2018. Training to all staff will occur shortly after. Field checks and apparent violation training will also be part of this ARS training.

B. MARKETING THE EMPLOYMENT SERVICE COMPLAINT SYSTEM TO FARMWORKERS AND OTHER FARMWORKER ADVOCACY GROUPS.

The Oklahoma employment service complaint system has been revised and training provided to center and other OESC staff. The process is being monitored by the SMA, through desk reviews and on-site local office visits, and when deficiencies are identified, training is provided. It is also anticipated that giving further training to one-stop center staff in properly identifying MSFWs will result in more MSFW complaints being identified. Outreach workers and their activity in work and community settings, will allow for increased knowledge of not only the complaint system but all available resources. Additionally, training of the complaint system for all one-stop center staff should also lead to increased use of the complaint system. Outreach materials to be developed will include complaint system information for workers, employers and organizations who work with MSFWs. Ongoing. Complaint policy & procedures were updated and all center staff trained. Currently (Jan 2018) some issues with implementation have been identified and additional training being planned in Feb 2018. The complaint system is currently being marketed through informational brochures (English/Spanish), posters and outreach.

C. MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

Oklahoma currently markets the Agricultural Recruitment System (ARS) through the Oklahoma Employment Security website, which also includes references to USDOL websites. We will also improve the marketing of the ARS by developing and distributing agricultural handbooks for employers and farmworkers which will incorporate the ARS as handled in Oklahoma. The handbook will also be available electronically on the OESC website. Once available, these handbooks will be marketed through Centers, employer associations and agents. Center staff will be required to have training on not only the ARS, but other related MSFW and agricultural employer topics. Additionally, ARS information will be marketed through attachments to our annual Wage and Hour surveys; email or mailing blasts to those employers with agricultural NAICS codes; focused promotional telephone contacts and advertisements in Oklahoma agricultural magazines, newsletters or other media outlets and targeted presentations. Training to address the specific requirements for all agricultural job orders handled by center staff is being planned so that staff will be able to better communicate the advantages and requirements of the ARS. As mentioned previously, the ARS is being updated with policy & procedures to be completed by April 2018. Training to all staff will occur shortly after. The original planned marketing strategy remains in place with plans to initiate upon completion and training of ARS.

4. OTHER REQUIREMENTS
A. COLLABORATION
Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

There are Non-Financial Cooperative Agreements in place between OESC, the Area Workforce Development Boards, the State Monitor Advocate and ORO, our NFJP partner. A new MOU with ORO will be finalized by July 2018. Oklahoma established an agricultural outreach committee with the first meeting held in February 2016. The intent of the committee is to increase collaboration between federal, state and other government agencies as well as other service and community providers. Collaboration has been in place and continues to grow as we become more familiar with other MSFW providers. This multi-agency outreach group is currently defining its vision and purpose for the future, and how to better communicate its purpose. This is ongoing.

B. REVIEW AND PUBLIC COMMENT.

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP. The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

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The Oklahoma AOP was originally sent out for review and comment as required. The director of Oklahomans for Rural Opportunities Development Corporation (ORO, our NFJP
grantee), the director of the OESC RES - Customer Support Division and the Policy and Program Officer of the Oklahoma Office of Workforce Development have reported back as to the plan being “a good plan of action” and “moving in the right direction”. This AOP was available for review and comment as part of the Oklahoma 4-year state plan with no comments received relating to the AOP portions This Jan 2018 update of the AOP was made available for review to ORO, our NFJP grantee and the OESC Re-employment Services (RES) - Customer Services Director immediately upon completion. A copy was also provided to all 39 Oklahoma Agricultural Group members. The AOP will also be posted by Oklahoma Works (WIOA) as part of the comment period for the entire state plan. Those who received a copy for review were:

- ORO (NFJP) (2)
- OK Department of Agriculture - Market Development, Consumer Protection (2)
- Variety Care - Farm Worker Health
- Mexican Consulate (3)
- OKDOL OSHA Industrial Hygiene
- Legal Aid of Oklahoma (3)
- OESC FLC Specialist
- Oklahoma Cooperative Extension - OSU (3)
- National Safety Council
- Okie 811 - Damage Prevention
- Oklahoma Safety Council
- OESC RES Customer Service Division
- University of Oklahoma Center for English as a Second Language (3)
- OKDOL - Child Labor Program
- USDOL - OSHA (2)
- OESC - Outreach Workers (3)
- OK State Department of Education - Migrant Education Program
- National Safety Council
- USDOL Wage & Hour (2)
- OK Employer Traffic Safety
- USDA - Risk Management
- OESC Center Managers (3)

Of those who received a copy, the following submitted responses: Six (6) responses total were received. Three (3) were complimentary of the plan.

**ORO**

I have read the AOP you sent out. I think you did a great job in collecting all the data on the agriculture statistics for Oklahoma. This kind of data is useful the contribution Oklahoma makes towards the economy in this state and the country, many people do not know that Oklahoma is one of the major players in agriculture production in grain, cotton, cattle, and feed etc... I really appreciate all your hard work and dedication to produce this document. I do not have any comment to add at this time.
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It looks good to me.

Thank you, Pam. I bet you that took some time to write! We look forward to the next meeting!

The other three (3) comments were to provide more emphasis on their agencies' roles for outreach and training. These comments will be incorporated into outreach media such as brochures, an outreach webpage and presentations.

The AOP is very well written. I wonder if you could add somewhere briefly the outreach that US DOL OSHA, and ODOL OSHA Consultation would do (provide awareness on hazards of pesticides, heat related illnesses, hazards of agricultural machinery, among others). And the US DOL Wage and Hour Division (protect workers from being paid below the federal minimum wage; being deprived from overtime pay and enforce child labor laws).

Your plan looks great! The only addition that I do suggest is to contact our migrant districts, attend state and districts PACs meetings, and provide presentations. ... is planning our 2nd state PAC meeting via video conference from 1:00 pm - 3:00 pm on March 28th. Would you like 15 minutes for a short presentation? Here is the list of migrant school districts and their contacts information.

Pam, thank you for sharing. Here are my comments. Access to Legal Assistance is a MSFW need and may involve UI denial appeals, wages, conditions, contracts, housing and more. Legal Aid Services of Oklahoma (LASO) is very interested in being a part of any training offered to the state merit center outreach workers and other OESC staff. LASO is also interested in being a part of outreach activities planning. LASO is willing to add its legal rights informational pamphlets to the MSFW informational packets. LASO asks to have a link on the MSFW State Monitor Advocate Internet website. LASO welcomes the opportunity to participate in any ONE STOP efforts.

The clear message received was a need to communicate what is available and how to interact with them. This was addressed with respondents mentioned above and the OK Agricultural Outreach Group at a recent meeting. There was a majority response to 1) have a webpage which highlights the Ag Group & specifically identifies each member, their programs & services, with contact information and 2) Develop an Ag Outreach group directory of members, their programs/services and contact info for distribution throughout the state during presentations and outreach activities. OESC will take advantage of any
training opportunities that MSFW partners are willing to provide to outreach workers and the SMA. Additionally, we will look into coordinating outreach efforts with them as much as possible and continue sharing informational materials about the varied programs and services they represent.

C. DATA ASSESSMENT.

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

A review of the past four (4) years of data from the USDOL Labor Exchange Agricultural Reporting System (LEARS) addressing that MSFWs are provided quantitatively proportionate services as non-MSFWs are shows that Oklahoma met the required levels in 15 of 20 quarters reviewed. 5 quarters did not meet the minimum of 4 indicators required. 3 of these quarters were in Qtrs. 2, 3 & 4 of PY 2012 and 2 of these quarters were in Qtrs. 2 & 3 PY 2015. With regard to these 2 most recent quarters, it was found that 79 MSFWs were reported from our Centers, when in fact, 31 were later identified as actually meeting the definition of a MSFW. This could have resulted in the reporting of MSFW data for visitors to the centers who did not receive services. A review of every MSFW registrant, who may have misidentified or did not receive any center service, would allow centers to reach out to those MSFWs to ensure availability of programs and services are communicated. Centers are not available after hours and when MSFWs would be seeking their services. We believe this is resulting in an increase of self-service activities, outside of “in-center” contact, and would be equitable to others who access OKJobMatch through this method. Again, having centers contacting those MSFWs who have not pursued services would be indicated. The state believes the proper identification of MSFWs at Centers and in OKJobMatch will result in the meeting of 4 or more equity indicators each quarter, in the future. This will continue to be monitored, researched and commented upon, if needed. A change in MSFW definition, combined with changing data collection and reporting methods has made it difficult to properly identify ongoing compliance at this time. Ongoing training, review of MSFW registrations (both in Center and self-service) for proper designation and follow-up with self-service MSFWs to provide center informational services is planned throughout 2018. Continued improvements on data collection and reporting methods will also provide more consistent review. The SMA will continue to advocate for improved data representative of the agricultural community, its employers and workers. MSFW data which needs to be collected will be a primary focus.

D. ASSESSMENT OF PROGRESS

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

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

1) the establishment of an agricultural outreach group as a joint effort between OESC and DOL Wage & Hour; This group continues to grow and is becoming more unified in strategies to educate others about concerns of MSFWs.
2) identification of significant documents, informational materials and other items used daily by our centers which need translation to Spanish, the primary non-English language identified; Occurred and continues to occur as needed.

3) identification of pertinent agricultural groups, organizations and associations and pursuing alliances with them; Occurs through the Oklahoma Agricultural Outreach Group and planning for outreach activities.

4) establishment of a more visible MSFW internet presence through the development of an Oklahoma State Monitor webpage on the OESC website in January 2015; This webpage & several related ones will be updated by May 2018.

5) Ongoing training to center staff with a desk aid for proper identification of MSFWs; Desk aid with new MSFW definition trained upon and provided. This training will be ongoing.

6) improved partnership and developing a new MOU with our NFJP partner; Interaction between ORO and SMA continues and discussion of coordinated outreach is one focus. A new MOU will be in place by July 2018. and

7) Identification of community based events related to MSFWs or their communities is ongoing.

Several activities needing further attention which are carried over to this plan, include but are not limited to:

1) Outreach staffing and required activities; All three merit staff outreach workers were trained in requirements of the position. Ongoing training for items such as Human Trafficking, sexual harassment, UI benefits, reporting apparent violations, etc. continue to be planned. (Note: one Outreach Worker moved to another state and has been replaced). Continuing to make outreach workers aware of all available training and encourage their participation. Training for all is ongoing.

2) the marketing of state centers as a viable resource for farmworkers; This has been occurring through outreach activities and providing information materials to MSFWs or family. Marketing of this, in conjunction with complaint information will be reviewed for possible commercial media applications (i.e. ads, radio or other methods of communication).

3) monitoring of local centers to identify areas or practices requiring training and establishing training modules to train center staff and partners in identification of MSFWs, service 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; This has been previously commented upon throughout this AOP. Training has occurred regarding most MSFW items. ARS and follow-up with registered MSFWs is being planned.

4) the development and distribution of handbooks to assist both farmworkers and employers; Informational materials continue to be developed and provided. A new goal for the MSFW Handbook is fall 2018, with an Agricultural Employment Handbook for employers by March 2019.
5) development of OESC MSFW policy and procedures; MSFW System Policy and Procedures should be complete by fall of 2018. and

6) improvement to the LMI and other data resources for better identification of MSFWs in the state. SMA will continue to identify and provide data shortcomings on available MSFW information in Oklahoma, to relevant divisions or agencies.

E. STATE MONITOR ADVOCATE

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

This Jan 2018 update of the Oklahoma State AOP was completed, reviewed & approved by Pam Hoskins, Oklahoma State Monitor Advocate

WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

1. The Wagner-Peyser 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. The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers; 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 services, Adult and Dislocated Worker programs and Youth Programs under Title I; and Yes

4. State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations. Yes

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

The Unified or Combined State Plan must include a description of the following as it pertains to Adult Education and Literacy programs under title II, the Adult Education and Family Literacy Act (AEFLA).

A. ALIGNING OF CONTENT STANDARDS

Describe how the eligible agency will, by July 1, 2016, align its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The 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:

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

Instructional purposes of assessment include but are not limited to:

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

B. LOCAL ACTIVITIES
Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

**ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)**

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that—
  1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
  2. Is for the purpose of educational and career advancement.

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 in order to assure quality basic skills services for all students across the State. Under WIOA, ODCTE will fund 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 ABE service provider will provide one or more of these local activities. ABE service providers not providing all local activities listed may assist ABE students in referring those students to organizations that provide those activities. For example, if an ABE service provider who is providing adult education and literacy but is not providing integrated education and training, then said provider will need to assist interested students to those organizations providing workforce preparation activities.

**Definition of Activities:**

1. 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
2. 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.

3. 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.

4. 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 of the following activities:

   o Parent or family Adult Education and literacy activities that lead to readiness for postsecondary education or training, career advancement, and economic self-sufficiency;
   o Interactive literacy activities between parents or family members and their children;
   o 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; and
   o 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.

5. English language acquisition activities: a 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

   o Attainment of a secondary school diploma or its equivalent and
   o Transition to postsecondary education and training; or
   o Employment.

6. Integrated English literacy and civics activities: 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.

7. 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.

8. Integrated education and training: a 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 ABE providers in providing the guidance and expectations necessary for a student to receive their secondary school diploma.

The ODCTE strives to serve more adult basic education students and serve those more efficiently in order 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 an open competition for new grants to be awarded July 1, 2018. 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 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 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 13 considerations are as follows:

1. Describe the degree to which your organization would be responsive to—

   o regional needs as identified in the local workforce development area plan under section 108 of title I of WIOA;
   o serving individuals in the community who were identified in the local workforce development area plan as most in need of adult education and literacy activities, including individuals who have low levels of literacy skills or who are English language learners;
2. The ability of your organization to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;

3. Past effectiveness of your organization in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in question 4 above, especially with respect to eligible individuals who have low levels of literacy;

4. The extent to which your organization demonstrates alignment between proposed activities and services and the strategy and goals of the local workforce development area plan (section 108), as well as the activities and services of the one-stop partners;

5. Whether your organization’s program is 1) of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains; and (2) uses instructional practices that include the essential components of reading instruction;

6. Whether your organization’s activities, including whether reading, writing, speaking, mathematics, and English language acquisition instruction delivered by the eligible provider, are based on the best practices derived from the most rigorous research available and appropriate, including scientifically valid research and effective educational practice;

7. Whether your organization’s activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance;

8. Whether your organization’s activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;

9. Whether your organization’s activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development, including through electronic means;

10. Whether your organization’s activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;

11. Whether your organization’s activities offer flexible schedules and coordination with Federal, State, and local support services (such as child care, 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.

1. Allocation 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).

2. 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 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 individuals 18-24 years of age and 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 two 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. Awards may be based on multiple factors including reasonableness of the budget relative to the service area, quality of the eligible provider application, and results from the pre-award risk assessment. 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. Each ABE service provider may, at the discretion of ODCTE and based on past eligible provider expenditures and need, receive a minimum allocation of $50,000 (combined federal and state funds). This minimum allocation does not include any funds for corrections education or integrated English literacy and civics education.

The following may be used to calculate the allocation after the hold steady period:

1) Up to fifty percent may be used toward provider need,

2) Up to seventy percent of the base money may be allocated based on the total number of fundable students each program served in the hold steady period of up to three years. Fundable students are defined as meeting the following criteria:

   o 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.

3) Up to forty percent of the base money is allocated based on program performance points earned by each program two years prior to the allocation year. Performance points include the following:

- Meeting or exceeding the state’s target goal percentage in each NRS educational functioning level - total of 11 points;
- 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) - total of 4 points;
- Meeting or exceeding the state’s target percentage of 60 percent for students receiving a pre- and post-assessment score within the fiscal year - total of 1 point.

The total percentage for each of these three variables (performance points, number of fundable students, and provider need) will equal 100%.

The ODCTE may allocate funds to each service provider based on an ABE service provider meeting negotiated performance levels. Service providers not meeting negotiated performance levels may see a reduction in their allocation for the following year. 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 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 ABE service provider. The carryover limit may not exceed 75% of their projected allocation for the upcoming year. The overage will then be redistributed to other service providers below the 75% carryover limit.

SPECIAL RULE

Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it
will fund, in accordance with the requirements of title II, subtitle C, any of the following 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; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

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 which teach basic skills in reading, writing, and math
- adult secondary programs leading to a High School Equivalency or its equivalent
- workplace education programs which 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 a large number of 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 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. 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 ABE funds are used to support the Adult Basic Education activities in many of the correctional institutions.

During our 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. The school system began at the Jim E. Hamilton CareerTech Skills Center inside the Jim E. Hamilton (formerly Ouachita) Correctional Center at Hodgen, Oklahoma. Today, the Skills Centers offers services in state correctional facilities, juvenile detention facilities and community correctional facilities.

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. 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.

Allocation for correctional programs are subtracted from the 82.5 percent prior to allocating monies to local grantees. The total amount allocated to correctional programs may be up to twenty percent of the 82.5% of the total award. Funding method and considerations for Corrections will ensure equitable access and consideration for all eligible providers. 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, 2018. 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 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.

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
English Literacy: The purposes of English literacy instruction are to: 1. Assist adults whose native language is other than English and who have limited English proficiency to increase their ability to speak, read, write, and understand the English language; 2. Assist adults with limited English proficiency in obtaining the literacy and basic skills necessary to compete in the workplace, become self-sufficient, and exercise the rights and responsibilities of citizenship. The key elements of English literacy instructional programs include the following: a. Classroom Environment: Classroom environments that are non threatening will be provided in order to facilitate the second language acquisition process and to enhance self-esteem and teamwork; b. Instructional Strategies: English language skills will be taught in the real-life contexts of the workplace, the family, and the community to ensure that limited English speaking adults acquire the English language survival skills needed in a variety of work, academic, and social settings; c. Assessment: Students’ listening, speaking, reading, and writing skills will be assessed using the Basic English Skills Test (BEST) or other formal ESL assessment instruments. The pre- and post-assessments will establish baseline and progress data in order to meet the core indicators of performance as identified in Section 5.0 of the State Plan. d. Goal Setting: English literacy students will be assisted in setting realistic goals based on the initial assessment of their skills and on their personal goals; e. Citizenship Instruction: Students will be provided with English language and citizenship instruction necessary to successfully complete the citizenship application and interview process where appropriate.

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 will conduct an open competition for new grants to be awarded July 1, 2018. 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 an 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. IELCE programs will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation. IELCE programs 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; and integrate with the local workforce development system and its functions to carry out the activities of the program. The integrated education and training activities will include a balance of instruction across two areas: Civics Participation and Citizenship preparation, and will deliver the components simultaneously, and use occupationally relevant instructional materials. A single set of learning objectives that identifies specific adult education content, workforce preparation activities, and workforce competencies will be established.

The two areas are outlined below:

Civic Participation: This program supports the design, creation, implementation and delivery of instructional activities that integrates civics education content with ESL instruction. This program connects literacy to the lives of learners and reflects their experiences as community members, parents and participants in the community and workforce system. Through these programs, adults understand and deal with social issues through community research projects, collecting and analyzing information, and interpreting findings that provide a direct connection to classroom learning with personal knowledge and community experience.

Citizenship Preparation: This program uses ESL best practices, methodologies and citizenship preparation material to prepare learners to take and pass the USCIS written and oral citizenship test. The program includes outreach services, skills assessment, curriculum development and instruction, professional development, naturalization preparation and assistance and program evaluation.

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 in order to assure quality basic skills services for all students across the State.

12.5 percent of the Federal money is allowed for Leadership activities; 5 percent of the Federal money is allowed for administrative activities; 82.5 percent of the Federal money must be distributed to grantees. All funded providers will be required to detail the process that will be used to collaborate with all stakeholders and align adult basic education programming with all core and combined partners. Eligible providers will provide services in alignment with local plans detailing how they will promote concurrent enrollment with Title I programs and activities in order to meet the state adjusted levels of performance and collect data to report on performance indicators. In addition, all providers will describe how
they will fulfill one-stop responsibilities in their region. The following activities are ongoing in Oklahoma in preparation to meet the new requirements: 1. The alignment of adult education and literacy activities with other core programs and one-stop partners: 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 ABE staff meet regularly with other core partners in aligning adult basic education activities with the activities of the core partners. 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 the implementing career pathways and allowing individuals access to employment and training services for individuals in adult education and literacy activities. ODCTE staff currently serve on the statewide Career Pathways committee that includes individuals from business and industry, technology centers, higher education, and adult basic education. 2. The establishment and operation of high quality professional development programs: Oklahoma may provide state administration funds annually for each ABE 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, and other means. Professional development topics to be covered may include areas suggested by the ABE service providers as well as areas necessary for the advancement of adult education in Oklahoma. These areas may include best practices in instruction, classroom management, learning disabilities for adults, retention of students, blended learning, interactive pedagogy, and best practices for ESL in teaching multilevel ESL classroom. 3. Technical assistance will be provided to eligible providers and may include 1) assistance in the use of technology, including for staff training to eligible providers especially the use of technology to improve data collection efficiencies, 2) the development and distribution of instructional practices based on the most current and valid research available, 3) student retention, 4) budget and claims, 5) student records, and 6) providing guidance to eligible providers as they fulfill their role as one-stop partners in providing access to employment, education, and training services. ODCTE staff will regularly meet on-site with eligible providers to assist these providers in these and other areas. 4. 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 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. Professional development activities will be evaluated utilizing a survey instrument issued by ODCTE staff. The survey utilized will assist the ODCTE in evaluating its professional development activities through 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.

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

ODCTE will use 12.5 percent of its federal allocation for adult education and literacy for statewide leadership activities. The following state leadership activities may be conducted annually:
I. ODCTE will offer year-round adult education teacher training workshops in order to improve the quality of instructional programs for adult learners. Adult education teachers will be required to attend at least one teacher training workshop during each program year.

1. Supporting Adults with Learning Disabilities and other Learning Differences
2. Developing and Implementing Work-based Education Programs
3. Integrating Work-based Education into the Adult Education Classroom
4. Implementing a Comprehensive Family Literacy Program
5. Family literacy training
6. Teaching English as a Second Language (ESL) Training
7. Assessment of Adult Learners Workshops on using the Tests of Adult Basic Education (TABE) will be offered. This training will assist teachers in administering standardized tests, interpreting test results, and using test results to plan instructional programs for adults.
8. Assessment of Limited English Speaking Adults
9. Training on the use of the Basic English Skills Test (BEST), a standardized assessment for ESL students, will be provided for English literacy teachers.
10. The LiteracyPro System
Oklahoma’s state-adopted Management Information System, LiteracyPro, provides local adult education and literacy programs the capacity to report participant outcomes and to monitor program performance against ODCTE’s performance measures. Training will be offered to local program providers in the continued use of LiteracyPro for maximum effectiveness in reporting participant outcomes and program performance.

9. Technology Training
10. Other Topics for Professional Development as identified by surveying adult basic education providers.

II. ODCTE will provide technical assistance and support to local adult education and literacy programs in the following areas:
1. Use of the LiteracyPro System, the state-adopted Information Management System;
2. Strategies and screening for adults with learning disabilities;
3. Implementing family literacy programs;
4. Implementing work-based education programs;
5. Coordination with the local One-Stop Centers;
6. Integrating adult education and literacy activities with job training programs;
7. Promoting linkages with employers;
8. Other areas, as needed.

A variety of activities will be used by ODCTE in providing technical assistance and support to local programs. These activities include on site and telephone technical assistance, conducting staff development workshops, collecting and disseminating information on best practices in family literacy, workplace education, supporting adults with learning disabilities, and job readiness, and facilitating local planning sessions with One-Stop providers, employers, and job training providers.

III. The monitoring and evaluation of the quality of, and the improvement in, adult education and literacy activities. ODCTE will monitor the adult education and literacy activities through on site visits periodically 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 and with the previously-established Indicators of Program Quality. In addition, ODCTE will develop a self-evaluation instrument for use by local program providers. This instrument will enable local providers to evaluate their own performance based upon the criteria for funding as described in Section 6.5 and upon Oklahoma’s Indicators of Program Quality.

IV. ODCTE plans to provide a limited number of incentive grants for adult education and literacy programs. The funding will go toward expanding current services, providing services in areas of need in adult basic education, and/or implement and/or upgrade instructional training and training technology.
V. Other activities of statewide significance which promote the purpose of the Adult Education and Family Literacy Act will also be supported as part of the State Leadership Activities. These may include such activities as statewide marketing of the adult education and literacy program, the publication of the Adult Education and Literacy Review, support for the State Workforce Development Board, support for screening for adults with learning disabilities and other adult literacy related activities.

F. ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

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.

CERTIFICATIONS

States must provide written and signed certifications that

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.  Yes
8. The plan is the basis for State operation and administration of the program.  Yes

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative
agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

**Statement for Loan Guarantees and Loan Insurance**

The undersigned states, to the best of his or her knowledge and belief, that: If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

**Applicant's Organization**  
Oklahoma Department of Career and Technology Education

**Full Name of Authorized Representative:**  
Dr. Marcie Mack

**Title of Authorized Representative:**  
State Director

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)  
(http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to OCTAE_MAT@ed.gov

**ASSURANCES**

The State Plan must include assurances that:

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 supplement and not supplant provisions).  
   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. 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; Yes

5. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) 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 and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and Yes

6. 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

7. 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

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the instructions posted at https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc.

The release of the 2018-2019 Oklahoma AEFLA application included the following criteria when meeting the needs of eligible individuals:

"Describe the steps you propose to take to ensure equitable access to, and participation in, your federally-assisted program for students, teachers, and other program beneficiaries with special needs. How do you propose 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)"

Applicants must address this criteria in the application, and if the applicant did not fully address this requirement, if awarded the applicant will be required to resubmit a response for this criteria.

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.

**PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION**

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

* Sec. 102(b)(D)(iii) of WIOA

**A. INPUT OF STATE REHABILITATION COUNCIL**

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:


The Oklahoma Rehabilitation Council complies with the Federal Rehabilitation Act mandates through its strategic plan process and the following functions and related tasks.

The Mission of the Oklahoma Rehabilitation Council (ORC) is “To facilitate consumer education and empowerment, to assure services are of high quality, and lead to employment of individuals with disabilities within the state of Oklahoma.”

ORC Members have worked very hard and dedicated many hours to being a part of the ever changing opportunities for people with disabilities in Oklahoma. The council’s success during FFY17 featured amazing, ambitious and committed individuals with disabilities through their success stories. Sharing their stories and quotes provided examples of the Oklahoma Department of Rehabilitation Services (OKDRS) counseling services, information, referrals and support along with the council’s oversight to assist individuals in gaining employment. The stories also identify the key partners DRS utilizes within the WIOA system and how that partnership plays an important role in the client’s development in different areas like job seeking, education, training, etc.

The council created legislative primers that contained data regarding people with disabilities and the State of Oklahoma. This information was distributed to legislators at the
Oklahoma Capitol and on the hill in Washington D.C. Oklahoma Rehabilitation Council (ORC) assisted DRS Process Improvement Unit (PI) with multiple surveys for the Public Transition Needs Assessment, targeting youth with Disabilities between the ages of 18-24, school staff, parents of youth with Disabilities, Partner Agencies staff (other state agencies, CRPs, disability advocacy groups), employers, DRS staff and VR/VS Open Case Client Satisfaction Survey Report. The legislative primers also showcase the impact of the services provided by OKDRS and collaborative effort of ORC and OKDRS.

In Oklahoma, we persist in our participation in ongoing initiatives. OKDRS and ORC continue to play vital roles in the Oklahoma Works Initiative. Oklahoma Works is an initiative to increase the wealth of all Oklahomans through facilitating quality employment for workers and availability of highly skilled talent for business and industry. Access for All is an initiative designed to help create a workforce for all Oklahomans including individuals with disabilities. These initiatives are a coalition of state agencies, educational institutions, businesses and other partners. The Access for All initiative enables OKDRS and ORC to strengthen our partnership in assisting people with disabilities achieve their personal goals and visions. ORC has the opportunity to advocate and lead people with disabilities to a better future. ORC is honored to be a partner and supporter of the OKDRS, the Agency staff and the citizens of Oklahoma.

2. THE DESIGNATED STATE UNIT’S RESPONSE TO THE COUNCIL’S INPUT AND RECOMMENDATIONS; AND

The DSA concurs with the SRC’s position and recommendations as stated in this section. The DSA continues to have an extremely cooperative, productive, and interactive relationship with the Oklahoma SRC. The DSA administration fully participates in the SRC activities including their quarterly meetings. Designated DSA liaisons attend and fully participate in SRC committee meetings and serve as associate members of the SRC. The DSA also continues to work with the SRC on joint projects. The SRC’s involvement in the development and revision of agency policy has been of particular value in identifying consumer issues related to policy and in developing rules that respond effectively to both client and agency concerns. Formal planning meetings for the state plan included the SRC program manager as a member of the team, as well as for both divisions of vocational rehabilitation and visual services strategic planning teams. The DSA and the SRC are committed as partners in leading the Oklahoma Workforce System towards enhanced accessibility for all individuals, including those with disabilities.

3. THE DESIGNATED STATE UNIT’S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL’S INPUT OR RECOMMENDATIONS.

This is not applicable.

B. REQUEST FOR WAIVER OF STATEWIDENESS

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:
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 Oklahoma Department of Rehabilitation Services 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. ALL STATE PLAN REQUIREMENTS WILL APPLY

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.

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

Thunderbird and Crossroads Clubhouses

The DSA entered into 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).

Thunderbird Clubhouse

Memorandum of Understanding: The DSA entered into a contracted agreement with the Thunderbird Clubhouse in Norman, Oklahoma, which is certified through the International Center for Clubhouse Development (ICCD).

Scope of Work: The agreement is for establishing employment services for DSA clients with severe mental illness for the purpose of obtaining and maintaining employment. These services are based on the ICCD Standards for Clubhouse Programs.

DSA Responsibilities: The DSA agrees to provide payment for satisfactory performance of services outlined.

Partner Responsibilities: Thunderbird Clubhouse will:

1. Establish new employment-related programs for people with severe mental illness who are eligible to receive assistance through the DSA.

2. Facilitate the hiring of one new full time equivalent (FTE) position supervised by the Clubhouse Director.
a. The FTE will contribute to the development of the clubhouse employment program by organizing and conducting a minimum of one marketing event, semi-annually, to take place at the clubhouse to bring in representatives from local businesses who may be potential employers for DSA clients who are clubhouse members.

b. The FTE will join and maintain active membership and participation in civic organizations and will create a business index of civic organizations to which the clubhouse will market its program.

c. The FTE will maintain a record of all presentations made and all employment referrals that result from these contacts.

d. The FTE will be trained to implement job development strategies with potential employers in the community to support maintaining a minimum of eight TE sites and increasing the number of permanent employment job opportunities available to DSA clubhouse members.

e. The FTE will provide job coach assistance to DSA clubhouse members, including both on and off-site employment support and assist with requesting job site accommodations as they are needed.

Funding/Costs: The DSA agrees to pay Thunderbird Clubhouse, upon satisfactory performance of services outlined in agreement, up to $52,500.00.

Referral Process: Recipients of services must have a severe mental illness and meet DSA criteria for Order of Selection priority group one and be referred through the local DSA counselor.

**Crossroads Clubhouse**

Memorandum of Understanding: The DSA entered into a contracted agreement with the Crossroads Clubhouse in Tulsa, Oklahoma, which is certified through the International Center for Clubhouse Development (ICCD).

Scope of Work: The agreement is for establishing employment services for DSA clients with severe mental illness for the purpose of obtaining and maintaining employment. These services are based on the ICCD Standards for Clubhouse Programs.

DSA Responsibilities: The DSA agrees to provide payment for satisfactory performance of services outlined.

Partner Responsibilities: Crossroads Clubhouse will:

1. Establish new employment-related programs for people with severe mental illness who are eligible to receive assistance through the DSA.

2. Facilitate the hiring of one new full time equivalent (FTE) position supervised by the Clubhouse Director.

a. The FTE will contribute to the development of the clubhouse employment program by organizing and conducting a minimum of one marketing event, semi-annually, to take place at the clubhouse to bring in representatives from local businesses who may be potential employers for DSA clients who are clubhouse members.
b. The FTE will join and maintain active membership and participation in civic organizations and will create a business index of civic organizations to which the clubhouse will market its program.

c. The FTE will maintain a record of all presentations made and all employment referrals that result from these contacts.

d. The FTE will be trained to implement job development strategies with potential employers in the community to support maintaining a minimum of eight TE sites and increasing the number of permanent employment job opportunities available to DSA clubhouse members.

e. The FTE will provide job coach assistance to DSA clubhouse members, including both on and off-site employment support and assist with requesting job site accommodations as they are needed.

Funding/Costs: The DSA agrees to pay Crossroads Clubhouse, upon satisfactory performance of services outlined in agreement, up to $52,500.00.

Referral Process: Recipients of services must have a severe mental illness and meet DSA criteria for Order of Selection priority group one and be referred through the local DSA counselor.

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:

1. continue outreach to other System Partners such as Oklahoma Career and Technology Education and OSU OKC; and the Oklahoma Employment Security Commission.
2. provide technical assistance to the state 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;

3. continue with creation of employment-related tips and fact sheets;

4. continue the train-the-trainer model with DSA employee representatives on Local Workforce Boards, one-stop operators and other core partner personnel to build capacity regarding Access for All initiatives with particular focus on the Access for All Certification process utilizing the Roadmap for Physical and Technology Accessibility Standards; A monthly webinar format will be utilized to complete this contract deliverable.

5. provide training to the Workforce System on the Access for All Certification process utilizing the Roadmap for Physical and Technology Accessibility Standards; A face to face training format will be utilized across the established Workforce regions in Oklahoma during the first quarter of PY18. This training and technical assistance will support the American Job Center’s efforts in receiving both physical and technology certification under the Access for All initiative.

6. present the TechAccessOK Conference - the second 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;

7. implement a series of surveys developed by the national LEAD Center to assess the experience of:
   • Job seekers
   • Employers
   • American Job Center staff

to determine their readiness and satisfaction with employers and the Oklahoma Works Workforce Development System;

*The LEAD Center is a collaborative of disability, workforce and economic empowerment organization dedicated to improving employment and economic advancement outcomes for all people with disabilities — funded by the Office of Disability Employment Policy, U.S. Department of Labor.

8. continue to work collaboratively with DSA to provide technical assistance and support to ACT regarding the accessibility of web-based versions of the ACT test and WorkKeys assessments in an effort to remove technological barriers for both students and job seekers with disabilities; Accessibility standards have been defined by the World Wide Web Consortium (W3C) Web Accessibility Initiative (WAI). The ultimate goal is to allow students and job seekers to participate independently and in the most integrated setting possible in compliance with non-discrimination provisions.

9. Oklahoma ABLE Tech will use a new, enterprise-level automated accessibility testing tool from WebAIM called WAVE Plus. This testing platform will crawl through websites and run
tests on entire sites or site subdomains. The platform will provide a detailed report of the accessibility barriers that it identifies, with specific details about where the barrier is identified, the nature of the barrier and relevant accessibility standards. In turn, Oklahoma ABLE Tech will provide this report to entities that own the website or web application and work with those entities to understand the findings documented in each report. Oklahoma ABLE Tech will also work with entities on remediation planning and, where necessary and/or desired, additional testing or technical assistance.

*It is important to note that the WAVE Plus tool is new and that specific features may change. In turn, work under the Oklahoma Works Workforce System Access for All initiative will help to shape the features and function of WAVE Plus for future users.*

Use of this testing platform will be available to DSA and other core programs under WIOA to ensure statewide compliance with electronic and information technology accessibility (EITA) training and technical assistance. ABLE Tech staff will continue collaborative efforts with the Office of Management and Enterprise Services (OMES) under Oklahoma’s EITA Law.

Funding/Costs: The DSA agrees to pay Oklahoma Able Tech, upon satisfactory performance of services outlined in agreement, up to $225,000.00.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE UNITED STATES DEPARTMENT OF AGRICULTURE;

No interagency agreement reached at this time, however, discussions are under way.

4. NONEDUCATIONAL 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 within OJA facilities and through the Oklahoma Department of Human Services facilities including group homes, short-term and long-term facilities, treatment centers, etc.

The VR 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. The VR counselors also work closely with OJA to assist the youth in getting resources they need to increase their chances of being successfully employed and decrease the recidivism rate upon release.

**Oklahoma NOW IS the Time (ONIT)**

**Memorandum of Understanding:**

The DSA and the Oklahoma Department of Mental Health and Substance Abuse Services (ODMSAS) agreement is for the purpose of the Mental Health Individualized Career Planning Model Project. The focus is on helping youth adults with mental illness and coordinating connections, resources, and referrals for services in the areas of education,
employment, housing, maintaining mental/emotional health, and legal/system related needs.

**Scope of Work:**

The two agencies will work together to address barriers through a program that will provide needed training and technical assistance to providers in the individualized career planning model specific to persons with serious mental illness (SMI). This program will continue training that will result in individualized career planning that will increase the likelihood that persons with SMI will find, obtain, and keep a job in the career field of their choice.

**DSA Responsibilities:**

The DSA will:

1. Offer contracts to the seven provider agencies (Hope, North Care, Red Rock, Creoks, Grand Lake, Mental Health of Oklahoma, and Family and Children’s Services) for innovation and expansion activities;
2. Provide training to the provider staff in evidence-based and promising practices;
3. Monitor the innovation and expansion contracts;
4. Meet and work with ODMHSAS staff, as needed, to ensure smooth development and implementation of the program, and
5. Participate on the Oklahoma Now is the Time/IPS advisory group.

**Partner Responsibilities:**

The ODMHSAS will:

1. Continue providing training and technical assistance to Community Mental Health Center (CMHC) to mental health staff;
2. Provide monitoring of the ODMHSAS contracts with providers to ensure that providers are utilizing their training in promising practices, and help ensure success of the program;
3. Analyze outcomes data for continuous quality improvement of provider services;
4. Meet with and work with DSA staff, as needed, to ensure smooth development and implementation of the program; and
5. Ensure that the DSA /ODMHSAS Mental Health Individualized Career Planning Model Project is included as a vital part of the Mental Health Initiative.

**5. STATE USE CONTRACTING PROGRAMS.**

The State of Oklahoma recognizes the value of people with significant disabilities by having established a 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 to 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 Division of Visual Services of the DSA, or a representative designated by the administrator, serves on the executive committee of the Oklahoma State Use Program. At present, this committee position is held by the contract monitor for non-medical vendors to DSA whom engage in a strategic role to encourage vendors to increase competitive employment, develop relationships and outreach, and review data for potential improvements.

The State Use Program continues to utilize a system of purchasing through a recognized portal system. All state agencies are required to purchase off of the portal contract before seeking goods or services elsewhere.

D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

1. DSU’S PLANS

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 will maintain 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. It is our intent to perform outreach to underrepresented groups, such as those on Section 504 Plans, youth in foster care, adjudicated youth, out-of-school youth, and those with other disabilities not documented on a 504 or IEP. The DSA does not have any updated transition and pre-employment transition policies but intend to complete the revisions by October 1, 2019.

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;

DSA has finalized an SEA agreement and will be implemented on July 1, 2018. The formal interagency agreement with the State educational agency provides for: i) 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; (ii) 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)]; (iii) 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 (iv) procedures for outreach to and identification of students with disabilities who need the transition services.

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.

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 the VR
services or transition services in general; and input on presentation materials, handbooks, data collection and reporting, and 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; and (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 ODRS 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.

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 iJobs, WOW!, STEM Camp, and others.

The DSA will collaborate 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 will 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 will continue 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.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

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 cooperative relationships with the Centers for Independent Living (CILs) through regular communication including attendance at SILC quarterly meetings. DSA encourages the CILs to provide informative training programs to the DSA field staff to access services available through the CILs. DSA is 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**

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency’s efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

DSA enters into contractual agreements with CRPs for the provision of Supported Employment services. There are 39 CRPs with a total of 158 contracts. 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 Oklahoma Department of Mental Health and Substance Abuse Services (ODMHSAS) describing collaboration on delivery of Supported Employment services and transitional employment services.

The DSA has initiated a pilot project with ODMHSAS and five-community mental health centers to provide individualized career planning and employment to individuals between the ages of 16-25 with serious mental illness.

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

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR SERVICES; AND

The DSA is committed to working with businesses and employers in recognizing competitive integrated employment and career exploration opportunities in serving job seekers with disabilities. Further, the DSA will focus upon pre-employment transition services when serving students with disabilities.

Utilization of Statewide Partners

In order to more effectively interface with Oklahoma companies, the DSA will maintain regular contact with statewide partner agencies that regularly contact and serve Oklahoma companies as a part of their mission. The DSA Business Services Consultant (BSC) will meet with each statewide agency partner to discuss how to work together and leverage resources which can benefit job seekers with disabilities in competitive employment positions. Informational sharing with agencies will be mutually beneficial, enhancing the DSA's ability to expand hiring opportunities for individuals with disabilities, and meeting workforce needs for Oklahoma companies.

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 will take advantage of regional alignment of federal and state partners. DSA staff will 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 will be 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 Opportunities

DSA plan to collaborate with the following partner entities:

- Oklahoma Manufacturing Alliance (OMA)
- Oklahoma Department of Commerce
- National Recruiting
- Regional Development Team
- Global Division
- Community Development Block Grant
- Oklahoma Works
- Rural Action Partnership Program Advisory Team
- Oklahoma Quality Jobs Program
- Oklahoma Career and Technology Schools
- Small Business Development Directors
- State Office of Career Tech
- Oklahoma Small Business Development Centers
2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

The DSA will work 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 will work with the DSA Transition Coordinator to seek out opportunities with the businesses across the state.

The DSA will provide 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 (PETS) Five Required Areas, education/training, employment, independent living, and self-advocacy. The DSA will also provide 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 will establish School Work Study contracts with over 200 schools, 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 will provide youth the opportunity to gain work related knowledge and skills are: Work Adjustment Training, Project SEARCH, Tech Now, and STEM Camps.

H. INTERAGENCY COOPERATION

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

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. DRS has implemented a new 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 DHS and
DSA utilizes an MOA to outline the provisions and responsibilities for extended services utilized in Medicaid funded programs.

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 (PETS) 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. DSA Director is a voting member of the Governor's Transformation Advisory Board providing guidance on expenditures of federal mental health grants.

**Initiatives include:**

- Monthly Oklahoma Systems of Care Social Marketing Committee
- Monthly Oklahoma Mental Health Planning and Advisory Council
- Monthly Oklahoma Systems of Care State Advisory Team
- Monthly Oklahoma Health Care Authority Behavioral Health Advisory Council
- Participation in study teams and work groups as appropriate and necessary

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.

The commissioners and directors of the child—serving state agencies will serve personally on the partnership alongside the Directors of the Oklahoma Family Network (OFN), National Alliance on Mental Illness (NAMI) Oklahoma, family members, youth, and young adults. The partnership meets two or more times annually to receive reports and give approvals for actions and initiatives.

The partnership monitors for the following outcomes:

**For all with or at risk for an MEB:**

- Increased resiliency as shown by improved daily functioning
- Increased wellness activities and improved school/community functioning
- Reduced risk behaviors

**For all those identified with serious MEBs:**

- Increased days at home and in school
- Improved grades and less detention and suspension
- Increased time periods with no contact with law enforcement
- Improved mental health functioning
- Success in decreasing substance abuse
- Having and making progress on wellness goals

**For young adults:**
System Outcomes

- Increased and fully supported cross—system collaborative initiatives
- Transparency and accountability across systems, including data sharing
- Annual financial mapping to assist developing shared priorities
- Evidence based practice and an outcomes—driven service system
- Increased capacity, serving more families more efficiently and effectively
- Joint budget requests that pertain to the prevention, early intervention, treatment and support for those with MEB disorders.

As a result of the second MOA, the DSA has two pilot projects with ODMHSAS and community mental health centers to provide individualized career planning and employment to individuals with serious mental illness.

1. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS.

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

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 95 job seekers; DVR average is 110 and DVS average is 47. 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 = 20
Programs Field Representative = 10
VR Specialist — Counselor = 126
VR Specialist — Vocational Evaluator = 4
Assistive Technology Specialist = 6
Rehab of the Blind Specialist = 14
Specialist on Deaf/Blindness = 1

ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

Listed is 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 =1
Programs Manager — Current Vacancies = 2
Programs Field Representative — Current Vacancies = 3
VR Specialist — Counselor — Current Vacancies = 15
VR Specialist — Vocational Evaluator — Current Vacancies = 1
Assistive Technology Specialist — Current Vacancies = 2
Rehab of the Blind Specialist — Current Vacancies = 3
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 is 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 = 3
VR Specialist — Counselor = 28
VR Specialist — Vocational Evaluator = 1
Assistive Technology Specialist = 2
Rehab of the Blind Specialist = 3
Specialist on Deaf/Blindness = 1

B. PERSONNEL DEVELOPMENT

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

There are two institutions of higher education in Oklahoma that prepare vocational rehabilitation professionals by awarding Masters of Science Degrees with Vocational Rehabilitation Counselor emphasis. These programs are Langston University and East Central University. Langston University is recognized by RSA as a historically black college/university (HBCU).

Both of these programs are 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. As such, 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 = 98 and at East Central University = 57.

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 = 37 and from East Central University = 13.

2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional
associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

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. The goals and activities listed below indicate the actions to take place during this plan year.

**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 will fund two trips for recruitment by the DSA Project Coordinator. The dates and locations are yet to be determined.

• DSA has staff taking advantage of the 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, a new Family Description has been written and implemented with Human Capital Management (HCM). It 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

Describe the State agency’s policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to
ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

**A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND**

Although there is no longer a federal requirement, the DSA continues to follow the CSPD standard that was set in 1999 for all existing staff and qualified applicants for VR Counselor positions. At the request of the Oklahoma Commission for Rehabilitation Services, all applicants for the positions of counselor, field services coordinator, and programs manager are reviewed by the DSA expert on CSPD.


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.

4. STAFF DEVELOPMENT.

Describe the State agency’s policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. SYSTEM OF STAFF DEVELOPMENT

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

Over 220 activities have been provided to staff in areas of:
o Autism Transition
o Ethics
o Workforce Partnership
o WorkKeys
o AgrAbility — Ag4Life
o Professional Conferences
o Deaf/HOH
o Variety of Disability Specific Trainings
o Assistive Technology
o Leadership
o Diversity related conferences
o Counselor and Support Staff Academies
o Job Development
o Mental Health and the impact of Mental Illness on the rehabilitation process
o Unified English Braille for DVS Counselors
o Core competencies training for managers, including Crucial Conversations, Crucial Accountabilities, and 7 Habits for Managers, Speed of Trust

B. ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE

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. Each year the Agency participates in the Fall and Spring National Council on Rehabilitation Education (NCRE) Conferences where new research is presented. Additionally, Institute on Rehabilitation Issues (IRI) documents are provided to all staff. Also as part of this program, materials are obtained and disseminated from a variety of seminars and conferences statewide, regionally, and nationally.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

Services to the Deaf and Hard of Hearing Unit (DVR)

Services for the Deaf and Hard of Hearing is a statewide program. It currently holds thirteen positions that 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 and 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.

**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

— Add Us In consortium — this DOL grant ended, however, the DSA will continue to develop best practices in employment targeting small businesses that are minority owned and people with disabilities from minority groups, Lesbian, Gay, Bisexual, Transgender (LGBT), women, and veterans. The DSA will continue this effort by referring job seekers to local workforce system partners.

— 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. TheSAVE 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.

6. **COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT**

As appropriate, describe the procedures and activities to coordinate the designated State unit’s comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.
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, and in-person small group training regarding IDEA, IEPs, and other school documentation.

**J. STATEWIDE ASSESSMENT**

(Formerly known as Attachment 4.11(a)).

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;

In collaboration with the Oklahoma Rehabilitation Council (SRC), the DSA divisions of vocational rehabilitation and visual services will follow the Model Comprehensive Statewide Needs Assessment (CSNA) methodology developed by *InfoUse*, Berkeley CA to conduct the needs assessment.

The model CSNA addresses rehabilitation needs of individuals with disabilities, particularly the vocational rehabilitation services needs of: individuals with most significant disabilities, including their need for supported employment services; minorities; individuals with disabilities who have been unserved or underserved by VR; individuals with disabilities served through other components of the statewide workforce development system (other than the vocational rehabilitation program); youth with disabilities, and students with disabilities; and the need to establish, develop, or improve community rehabilitation programs within the state.

The model CSNA process includes six steps:

1. Defining and establishing CSNA goals; Year 1 - The DSA and SRC will complete steps one and two, and initiate step three.

   Step 1: Defining and establishing CSNA goals. During this phase DSA staff will review available disability data and reports to establish the nature of the potential VR population within the state as well as identify other agencies and organizations that are resources for information collection. Tables and summaries of relevant report findings will be assembled as a briefing book for use in establishing study goals.

   Step 2: Developing CSNA plan for information and dissemination. During this phase DSA staff will develop a plan for collecting information, analyzing findings, disseminating results, and informing the state plan. The plan will include the identification of specific data, sources, and methods; data analysis; costs and timeline; and staffing or technical assistance needs.

   Step 3: Gathering the information. During this phase DSA staff will initiate the collection of data from identified sources and provide a description of the information collection process.
Accomplishments:

- Work and advisory teams were established. Goals were defined.
- A work plan, timeline and dissemination plan were developed. Possible sources of data were identified including census data, state population estimates; labor and economic data; VR agency data.
- Work team initiated data gathering.

Year 2 - The DSA and SRC will complete step three.

Step 3 continued as described above.

Accomplishments:

- Work team began collection of data from identified sources. Multiple surveys were distributed to stakeholders. Public meetings were held to identify needs of partners such as schools, workforce, CRPs; consumers and the public.

Changes to be added to Step 3 due to WIOA:

- Additional plans were developed to include needs of youth and students with disabilities and clients of workforce. These plans include gathering existing data from IDEA/504 reports, existing data from external transition needs studies, data from the workforce development system, and including these topics in the public hearings.

Year 3 - The DSA and SRC will complete steps four, five and six.

Step 4: Analyzing the results and developing findings. Once all the data is collected it will be analyzed and organized by information goal and topic.

Step 5: Developing the conclusions: Potential action strategies. During this phase conclusions from work will be developed and potential action strategies generated for each need expressed in findings.

Step 6: Informing state plan goals, priorities, and strategies. DSA staff will develop recommendations from the CSNA to inform the State Plan.

Status:

- Additional changes to Step 3 due to the WIOA, data collection is still ongoing but nearly complete. Analysis will begin upon completion. Estimated completion date and distribution for the report will be September 30, 2019.

The DSA client base and DSA counselors will be surveyed to identify the clients’ needs. An assessment will be conducted to obtain data regarding the rehabilitation needs of individuals with the most significant disabilities, including their need for supported employment services.

B. WHO ARE MINORITIES;
The DSA client base was analyzed and compared to the American Community Survey (ACS) state disability demographics to determine Oklahoma’s largest minority populations with disabilities and if any minority groups are disproportionately underserved. An estimated 24.0% of Oklahomans with disabilities belong to a minority racial group, including American Indian (7.9%) and Black (7.1%). OKDRS FFY 2017 demographics show that 10.0% of clients are American Indian while 17.7% of clients are Black. OKDRS co-serves American Indian clients via partnerships with Tribal VR programs and is essential due to cultural aspects that the Tribal VR programs are more adept at providing. OKDRS serves Hispanic clients in Oklahoma via our Hispanic unit. OKDRS 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;

Research determined that there are not minority groups disproportionately underserved in Oklahoma, but the DSA with the SRC held focus groups to obtain further 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.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

The DSA will obtain data from Workforce partners statewide and match it with DSA client data from the case management system (AWARE), to address the rehabilitation needs of individuals with disabilities, of those who have been served through other components of the statewide workforce development system.

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

The DSA has worked closely with the SRC to focus research on the needs of youth with disabilities. Two public surveys were conducted that targeted DSA staff, partners, employers, and the parents of youth with disabilities and the other focused on parents only.
Needs were identified to remove administrative barriers faced by partner agency staff when providing services to youth with disabilities and expanding knowledge of DSA programs that focus on youth. Services with the highest perceived need were soft skills training, internship opportunities, and other types of vocational training and employment experiences. DSA staff respondents reported a moderate to high need for soft skills training, greater parental involvement/support, development of independent living skills and additional work-related experiences for transition aged youth. 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.

The second survey focused on parents only and 17.57% of parents/guardians believed there were sufficient opportunities and indicated that there is a need to work closely with parents to lessen gaps in expectations and fears of employment and to increase parent understanding and participation in the transition planning process. Over half of respondent parents/guardians had concerns regarding how their child may be treated in a work environment. Only 65.54% of parents/guardians felt they were knowledgeable about transition planning. When asked, “What three services do you believe would most benefit your child,” the top three answers from parents/guardians were work-related experiences (45.00%), vocational training (35.71%), and independent living skills training (35.71%).

Future public survey planning will include the addition of two more separate surveys with a targeted focus on the parents of youth under 18 and youth 18 to 24 who are being served by the DSA. The DSA through their partnership with the SRC are obtaining information from the State Department of Education.

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 employees, 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.

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 the SRC and input from 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. Additional research targeting the needs of youth with disabilities is in progress.

K. ANNUAL ESTIMATES

Describe:

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES;

In 2016, the American Community Survey, U.S. Census Bureau, estimated 319,936 Oklahomans age 18-64 had disabilities which is 13.9% of working age population who may be eligible for VR services.

Oklahomans of working age population who may be determined eligible for Vocational Rehabilitation Services in FFY 2019 is 22,000. This estimate is the same for FFY 2020.

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 2019 equals 8,909. The number of eligible individuals is the same for FFY 2020.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

The number of eligible individuals estimated who will receive services in the Supported Employment Program for FFY 2019 equals 128. The number of estimated eligible individuals is the same for FFY 2020

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION;

These estimates per year are for FFY 2019 and FFY 2020.

Title I, Part B, Priority Group 1 = 3,728
Title I, Part B, Priority Group 2 = 4,012
Title I, Part B, Priority Group 3 = 663
Title VI, Part B = 64

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

These estimates per year are for FFY 2019 and FFY 2020.

Title I, Part B, Priority Group 1 = 610
Title I, Part B, Priority Group 2 = 2,741
Title I, Part B, Priority Group 3 = 303

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.

These estimates per year are for FFY 2019 and FFY 2020.

Title I, Part B, Priority Group 1 — Estimated Funds = 9,590.258 (Average Cost of Services = 2,572)
Title I, Part B, Priority Group 2 — Estimated Funds = 10,320.846 (Average Cost of Services = 2,572)
Title I, Part B, Priority Group 3 — Estimated Funds = 1,705,564 (Average Cost of Services = 2,572)
Title VI, Part B — Estimated Funds = 300,000 (Average Cost of Services = 4,700)

L. STATE GOALS AND PRIORITIES

The designated State unit must:

1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED

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 as well as participates in SRC committee activities. The SRC also collaborates in drafting and revision of agency policy development, and meets regularly with the DSA Administration. Finally, revisions to the state plan were developed jointly, as well as revisions to the specific goals and priorities identified in this section.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS.

The DSA divisions of Vocational Rehabilitation (DVR) and Visual Services (DVS) have identified the goals and priorities in carrying out the VR and Supported Employment programs.

Goal 1: Deliver improved, quality services to Oklahomans with disabilities.
Goal 2: Provide program results that are accountable to the public and our customers.
Goal 3: Strengthen Our Workforce
**Goal 4:** Strengthen Our Infrastructure

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

In a joint effort with the SRC, the DSA DVR/DVS divisions formed work groups to develop measures and action steps to address the DSA organizational strategic plan goals and priorities.

A. **THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;**

The goals and priorities were developed while reflecting upon the comprehensive statewide assessment latest findings.

B. **THE STATE’S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND**

The goals and priorities were developed while reflecting upon the VR performance accountabilities.

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 goals and priorities were developed while reflecting upon meeting information from discussions with the SRC.

**M. ORDER OF SELECTION**

Describe:

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. 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**

(a) **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 DVS services. The Department consults with the Oklahoma Rehabilitation Council regarding the:

(1) need to establish an order of selection, including any re-evaluation of the need;

(2) priority categories of the particular order of selection;

(3) criteria for determining individuals with the most significant disabilities; and
(4) administration of the order of selection.

(b) Priority groups. It is the policy of DRS to provide vocational rehabilitation services to eligible individuals under an order of selection. Under the order of selection, the Department has established three priority groups on the basis of serving first those with the most significant disabilities. Every individual determined to be eligible for DVR and DVS 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:

(1) Priority Group 1. Eligible individuals with the most significant barrier 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.

(2) 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.

(3) Priority Group 3. Eligible individuals with disabilities not meeting the definition of individual with a significant barrier.

(c) Implementation. Prior to the start of each fiscal quarter, or when circumstances require, the DRS 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. The Director will implement actions under the order of selection through written notice to DVR and DVS staff. The written notice will specify the implementation date of the action and direct DVR and DVS staff on how to handle cases by priority group and application date. DVR and DVS staff will inform each eligible individual on their caseloads:

(1) of the priority groups in the order of selection; of the individual’s assignment to a priority group; and

(3) of the individual’s right to appeal that assignment.

(d) Closing and opening priority groups. When all or part of 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
DRS Director will notify DVR and DVS 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.

(e) **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.

(f) **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; budgetary constraints
and/or lack of the capacity of staff to serve eligible individuals.

C. THE SERVICE AND OUTCOME GOALS.

The service and outcome goals for FFY 2019 and FFY 2020.

**For Priority Group 1:**

Number of individuals to be served = 3,728

Outcome goals successful closures = 2,080

Outcome goals unsuccessful closures = 1,648

**For Priority Group 2:**

Number of individuals to be served = 4,012

Outcome goals successful closures = 2,239
Outcome goals unsuccessful closures = 1,773

For Priority Group 3:
Number of individuals to be served = 663
Outcome goals successful closures = 370
Outcome goals unsuccessful closures = 293

D. THE TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER.

The time for which these goals may be achieved each year for FFY 2019 and FFY 2020 are:

For Priority Group 1:
Average days between plan signature and closure = 963

For Priority Group 2:
Average days between plan signature and closure = 791

For Priority Group 3:
Average days between plan signature and closure = 912

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

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.

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 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. Persons requiring post-employment services will also be provided the necessary services regardless of priority group assignment. Information and referral services will remain available to eligible individuals who are not in an open priority group. These individuals will be given information and guidance, using appropriate modes of communication, to assist such individuals in preparing for, securing, retaining or regaining employment, and will be appropriately referred to Federal and State programs (other than the vocational rehabilitation program) including other components of the statewide
workforce development system in the state. 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 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. DSA purchases services from qualified CRPs through contracts based on established rates for services. The Title VI goal and priority funds received are for FFY 2019 and FFY 2020.

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. An incentive is also provided to CRPs who assist individuals with obtaining employment with hourly wages of more than $14.45, 90 days after case closure.

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, the Department of Mental Health and Substance Abuse Services are collaboratively seeking strategies for improving services and enhancing service capacity for individuals with serious mental illness.

DSA will provide outreach to increase the number of community mental health CRPs contracting to provide employment services in an effort to improve the employment outcomes of individuals with serious mental illness. The DSA has initiated a pilot project with ODMHSAS and five community mental health centers to provide individualized career planning and employment to individuals between the ages of 16—25 with serious mental illness.
DSA will provide outreach to increase the number of Rural Employment CRPs in order to increase services and better meet the employment needs of individuals with disabilities in the rural areas of the state.

In an effort to increase services, DSA is initiating a customized employment program. The DSA is developing an expansion plan to fund the additional services required under the Work Innovation and Opportunity Act (WIOA).

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

The DSA is developing an extended services contract with ODMHSAS and Developmental Disability Services (DDS) of the Oklahoma Department of Human Services for youth with the most significant disabilities. This model allows for 18 months of intensive on-site supports and training prior to the initiation of up to 48 months of extended services if needed.

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 24 vendors, 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.

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 worked successfully for a minimum four of (4) and a 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) 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.
The Contractor may receive an incentive of five hundred dollars ($500) per individual for a one-time payment, 90 days after the DSA case is successfully closed, when the individual earns more than $21.09 per hour. This amount is based on the average hourly wage for Oklahoma at the time this contract was written.

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

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

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 DVS along with the DSA Business Consultant 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.

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.

**Autism Program**

DSA Autism Program continues as a partnership between the DSA and Goodwill Tulsa. This program currently operates three locations Curriculum is continuously developed to accommodate the needs of students. The program has expanded to autistic deaf and hard of hearing students. Success for this program reflects an 80%-90% success rate of students finding employment.

**Employment and Skills Development Services project**

In collaboration with the Community Partnerships Unit of the Oklahoma Department of Human Services, the DSA, Division of Vocational Rehabilitation (DVR), joined a group to address the Lincoln County Partnership for Child Well-Being. The group will carry out a study of the county’s child protective system to identify strengths, weaknesses and improvements needed within the child and family serving system in order to develop a plan of action to enhance the well-being of children.

The partnership approved a plan to establish an Access to Care Committee and a Task Force for the Improvement of Family Economic Security. The DSA will provide weekly on-site assistance to individuals in Lincoln County in securing and/or maintaining DSA services. Further, the DSA will assist the team with identifying individuals in the county, both youth and adults, eligible for DSA services.

**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 2016-2017 the DSA reached approximately 4000 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.

**Other DSA program areas that are utilized to expand and improve services include:**

- Visual Services Center in Tulsa and Oklahoma City
- DVS Technology Lab and Training Lab in Tulsa and Oklahoma City
- DVS Adult Blind Living Evaluation (ABLE)
- DVS Training Adult Program (TAP)
- 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 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)

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 job seekers in their journey to employment. 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, 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.
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.

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 a counselor on campus to provide transition service 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. Kiosks have also been installed with videophones so consumers can make phone calls independently for their job search and employment needs.

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 — new employment contract on Job Placement, Employment and Retention, and Supported Employment to serve Spanish speaking job seekers.

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 currently has MOUs in place with OKTVR Tribal programs to assure 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 will provide new employee academy training to OKTVR employees
when resources allow. 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.

**Road to Independence (RTI)**

The Oklahoma Department of Human Services (DHS) received a federal grant from the
Administration for Children and Families, Family and Youth Services Bureau, to plan for
how to build on the capacity of state and local systems to prevent long-term homelessness
among at-risk youth with foster care involvement; the DSA is a critical partner in this
initiative with DHS. The focus is on youth 14-21 years of age in housing, education,
employment, well-being, and permanent connections.

In Oklahoma County, there are 3 primary needs/issues, 1) inadequate independent living
and transition services, 2) placement instability of youth while in child welfare custody; and
3) lack of housing options for youth and young adults after exiting Child Welfare custody.
The effort coordinates support to the local Oklahoma County DHS Child Welfare Office 55A
to improve transition services, placement stability, and permanency for youth 14-18 years
of age in child welfare custody.

Partners include DHS, Oklahoma Independent Living programs, DSA, and NorthCare. The
DSA has a designated rehabilitation technician that DHS workers can contact when a youth
is placed to locate the VR counselor to contact and make a referral, when appropriate. Plans
to expand in the Tulsa area are pending.

**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
East Central University (Ada, Oklahoma) and Langston University (the State of Oklahoma’s
only historically black university). DSA staff members are committed to working with these
institutions of higher education, which are the only CORE-accredited rehabilitation
counselor programs within the State of Oklahoma. This commitment is shown by their willingness to work as adjunct professors, guest lecturers and project advisory committee members. Moreover, one part of 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 DSA Director’s designee or point-of-contact with groups that impact counselor diversity issues within the DSA, such as, 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, the Oklahoma Legislative Black Caucus and community-based rehabilitation programs.

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 in its programs for youth and students 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.

The DSA through an interagency agreement with the State Education Agency (SEA), 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 PETS statewide.

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 will also focus on the new statewide increase in the Basic Living Requirement, and intensive technical assistance through internships. In focusing on these higher expectations, the DSA will develop its business services model and will define clear roles for job placement specialists.

The DSA is committed to meeting the performance accountability measures and working with core program partners, as outlined under section 116 of WIOA.

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 and employer’s work sites throughout all levels of Oklahoma Works. Governor Mary Fallin implemented the Oklahoma Works Initiative focusing on Education and Training for Tomorrow’s Jobs. 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 Review Team and State Youth Council, both are teams that support the work of the governor’s 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. Access for All is brought to Oklahoma Works through a partnership between the DSA and Oklahoma ABLE Tech (Oklahoma’s Assistive Technology Act Program).

The Oklahoma Employment Security Commission (OESC), through the Oklahoma Works centers, develops and support increased employment opportunities for individuals with disabilities. OESC, through partnerships, improve service delivery for training and employment opportunities and outcomes for youth and adults with disabilities who are unemployed, underemployed, and/or receiving Social Security disability benefits. Staff work daily with a variety of partners locally and across the state that provide services to individuals with disabilities and the general population either directly at the Oklahoma Works centers or through referrals to partner facilities.

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.

The DSA delivers assistive technology for job seekers in their journey to employment. Assistive technology specialists complete a variety of different assistive technology assessments and evaluations for job seekers, business work sites, and system partners. The types of evaluations are 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**

Oklahoma’s Workforce System commitment on enhanced accessibility will continue by ‘Thinking Accessibility’ while serving individuals with disabilities. The DSA’s Initiative of “Accessibility = Access for All” within the Oklahoma Works workforce system, is a standard that has been set to springboard success for Oklahoma’s business and employers and job seekers in reaching Oklahoma’s Goal of Wealth Generation.

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.

**Oklahoma ABLE Tech — Creating an Accessible Workforce System for All — Accessibility Support and Training**

Oklahoma ABLE Tech partnered with the DSA to provide training and technical assistance to Oklahoma’s Workforce System. This partnership focuses on accessibility for all job seekers to all levels of the Workforce System. Working with the Governor’s Council for Workforce and Economic Development (GCWED), ABLE Tech brought sharper focus on developing and employing more Oklahomans with disabilities.

**Access for All Academies**
• Identify gaps in employment between people with disabilities and people without disabilities.

• Route participants to Oklahoma ABLE Tech Access for All website:

• Discussion of different disabilities and how they may change someone’s interaction with the physical and technology worlds

• Discuss and show some accessible and inaccessible physical environments

• Discuss and demonstrate individual accommodations and auxiliary aids to help with communication with people with disabilities in the workplace and learning environment.

• Legal overview: The Americans with Disabilities Act (ADA) and the Federal Rehabilitation Act both protect the rights of qualified people with disabilities in different facets of life

• Introduction to information and communication technology accessibility

• Discussion of laws like the ADA and Rehabilitation Act in the context of technology

• Overview of the Accessibility Integration Plan, which helps to identify key websites and software used by participants in the Workforce System

• Discussion of how technology accessibility fits into a number of roles within an organization

• Discussion of some of the elements that make technology more accessible

• Demonstration of how some of the elements that make technology more accessible actually help people with disabilities to use websites and software

• A walkthrough of some basic testing techniques to test websites for accessibility, aimed at less technical staff

REGIONAL ACADEMIES AND TECHNICAL ASSISTANCE

The Access for All Academies set the foundation for the ABLE Tech Regional “Access for All Academies” and technical assistance. The purpose of the regional academies was to:

• Provide a foundation of understanding of accessibility in the built environment and in technology

• Specify gaps in the workforce that we can all help close with a concerted effort around training and technical assistance

• Raise awareness and aptitude in thinking about Access for All in the Workforce System

• Help ABLE Tech and DSA better target potential audiences for Regional Academies, with better systemic understanding of how accessibility fits into the workforce

The Regional Access for All Academies introduced topics related to accessibility in the built environment and technology. Each Academy focused on accessibility in the built environment as well as the Americans with Disabilities Act and the Federal Rehabilitation Act and focused on accessible technology, on the web and in Microsoft Word.

Summary of Site Visit Findings— ADA physical elements — Strategy/Next Steps
• Prepare and distribute “Tool Kit of Solutions”— a checklist of the physical elements reviewed during 2015 site visits, current status, meets/does not meet guideline, ADA guideline, remedy, resources, timeframe for completion, date of completion
• Landlord responsibilities fact sheet: new construction and leases
• Certificate of completion for remediation of items
• Sites will self—assess every two years using Tool Kit of Solutions listed above
• Site point of contact will send an updated checklist to the DSA ADA Coordinator
• Implement site review prior to renovations and new construction, DSA ADA Coordinator will provide technical assistance

• FUTURE WEBINARS:

  • “Access for All” Academy summary to provide the baseline training content
  • Workforce Innovation and Opportunity Act and improving employment opportunities for individuals with disabilities
  • Landlord lease discussion, or shared responsibility situations

Information and Communication Technology (ICT) Program Review

Technology Accessibility Program Review performed to identify key technology tools and resources for consumers and internal audiences using the Accessibility Integration Plan to identity and prioritize technology tools used by external consumers and internal staff.

Technology Accessibility Integration Plan

  • Identify technology tools such as web applications, website, documents, and/or multimedia
  • Identify owners and managers of identified tools
  • Formulate basis for technology accessibility training and technical assistance
  • Identify relevant practitioners and leadership for focused training
  • Assess tools for accessibility
  • Assist in technology barrier removal

Future webinars:

  • Technology Accessibility 101
  • Accessibility in Word Accessibility Testing on the Cheap

Incorporated the ADA 25th year Anniversary

  • Oklahoma Office of Attorney General — Disability Employment Law Conference: Disabled to Enabled

Outreach to Workforce Sites and Employers

Access for All Assistive Technology and Information, demonstration areas co—located within workforce center sites.
Fact sheets: employment and accommodations, assistive technology flow chart, ADA and leases, effective communication, service animals

Workforce Innovations and Opportunity Act fact sheet

What’s possible: case studies/fact sheets highlighting accommodations and successes on the job. Pull together resources from ODEP/DOL What Can you Do campaign.org, RespectAbility, Job Accommodations Network (JAN.org), and PEAT Works

**Employer Outreach**

- Explore the DSA business services framework
- DSA ADA Coordinator
- DSA Workforce Development Board Representatives
- Develop informational material and/or training for employers — Workforce Innovation and Opportunity Act and Other relevant laws and best practices

**Electronic and Information Technology Accessibility Law - Federal 508 refresh**

- Amend law
- Maintain advisory council
- Provide training and technical assistance as needed (with Office of Management Enterprise Services (OMES), Higher Education, Career Technology system)
- Assist with state complaint and oversight process

**Accessibility work with private sector companies**

- ACT WorkKeys

Continue working with DRS outreach efforts to improve the accessibility of the Career Readiness Certificate (CRC) product for individuals with hearing loss and/or blind and visually impaired

8. HOW THE AGENCY’S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

**Goal 1:** Deliver improved, quality services to Oklahomans with disabilities.

Objective I: Develop employer relationships and prepare consumers for employment opportunities

Key Performance Measure: Increase average annual wage of consumers with disabilities placed in employment

Strategies:

Align strategic and state plans with the Governor's Vision: Oklahoma Works
Local Workforce Development Board and Youth Committee representation (DVS/DVS)

Expand business relationships leading to career opportunities for consumers

Expand participation of consumers with disabilities on OKJOBMATCH system, OK Career Guide, National Talent Acquisition Portal

Improve relationships with businesses and employers

Focus on better wages and long term employment

Objective II: Lead Statewide Accessibility efforts

Key Performance Measure: Increase knowledge and awareness of accessibility issues

Strategies:

Conduct statewide accessibility reviews with workforce system core partners

Conduct accessibility training for the workforce system Increase consumer access to affordable assistive technology (AT) to help remove barriers to employment

Objective III: Create new and expand existing consumer, business, and vendor partnerships

Key Performance Measure: Partnerships for successful consumer employment placements

Strategies:

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 (DVR/DVS)

Focus upon pre-employment transition services (DVR/DVS) Expand mental health partnerships (DVR)

Addressing community outreach

**Goal 2:** Provide program results that are accountable to the public and our customers.

Objective I: Meet or exceed all state and federal productivity requirements

Key Performance Measure: Increase number of successful employment outcomes for consumers with disabilities Strategies:

Timeliness and movement of caseloads more quickly (DVR/DVS)

Collect and use information from surveys, studies and data to evaluate program effectiveness and implement improvements Objective II: Provide quality services with all decisions supported by information that is factual, available to all, and consistent
Key Performance Measure: Quality decisions for consumer reaching employment goal

Strategies: Produce quality vocational evaluations and assessments of consumers reviewing vocational evaluation assessment tools that are up to date and accessible (DVR/DVS) Strengthen consumer job readiness

**Goal 3: Strengthen Our Workforce**

Objective I: Recruit, select, and retain engaged employees, Key Performance Measure: Improve retention and attrition rates Strategies:

Increase accountability for results

Improve recruitment of quality applicants, maintaining Certified Rehabilitation Counselor standard (DVR/DVS)

Increase academic development of staff (DVR/DVS) Competitive Salaries (DVR/DVS)

Supervisors and Counselors striving toward the same goal (DVR/DVS)

Objective II: Develop new and enhance existing training, mentoring and educational development opportunities

Key Performance Measure: Improve performance outcomes Strategies:

In-depth training on blindness (DVR/DVS)

Objective III: Implement a program of organizational growth Key Performance Measure: Increase employee engagement and leadership development

Strategies:

Provide a new employee academy (DVR/DVS)

Support leadership programs (DVR/DVS)

Develop and implement a Supervisor Core Competency Academy (DVR/DVS)

Implement online case process (DVR/DVS)

**Goal 4: Strengthen Our Infrastructure**

Objective I: Implement IT improvements

Key Performance Measure: Meet IT requirements by enhancing IT partnerships

Strategies:

Utilize IT resources and tools to improve or streamline service delivery

Objective II: Implement progressive policy review and change Key Performance Measure: Improve business processes Strategies:

Streamline and implement policy change (DVR/DVS)

**B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND**
The DSA will support all innovation and expansion activities, in collaboration with the SRC. The activities will include:

- Executive Committee: Outreach to businesses and disability organizations to educate on DSA programs, services, and activities and role of SRC; Participation with DSA Workforce System Activities.
- Program and Planning Committee: Data and Findings of Customer satisfaction Surveys and State performance accountability measures/assessment.
- 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.

14. 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.

- The Governor’s Oklahoma United We Ride (UWR) Council will continue to maintain the MyRide—Statewide website to remove the “lack of information” obstacle to employment.
- UWR will partner with other state programs, regions, and the Council for Workforce and Economic Development—Align and Connect to resolve the “inadequate transportation” barrier with strategies to improve quality, efficiency, and availability of transportation services to help individuals find and keep employment.

15. 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 Oklahoman’s 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).

**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. Access for All is brought to Oklahoma Works through a partnership between the Oklahoma Department of Rehabilitation Services (Oklahoma’s Vocational Rehabilitation Program) and Oklahoma ABLE Tech (Oklahoma’s Assistive Technology Act Program).

**Oklahoma Employment Security Commission - Modeling the way to “Thinking Accessibility”**

Through the Oklahoma Works American Job centers, strive to expand capacity, enhance partnerships, and service delivery to improve training and employment opportunities and outcomes for youth and adults with disabilities who are unemployed, underemployed, and/or receiving Social Security disability benefits. Staff work daily with a variety of partners locally and across the state that provide services to individuals with disabilities and the general population either directly at the centers or through referrals to partner facilities.

OESC began a two-phase project focusing upon physical and programmatic accessibility entitled “Thinking Accessibility” within the Workforce Centers, UI Service Centers, UI Adjudication Centers and the Appeal Tribunal. This partnership brings OKDRS and OKABT together to provide the resources and tools to assist OESC on continuing their commitment in serving individuals with disabilities.

**One-stop system certification policy standards for accessibility**

Oklahoma’s Workforce System commitment on enhanced accessibility will continue by ‘Thinking Accessibility’ while serving individuals with disabilities. The “Accessibility = Access for All” within the Oklahoma Works workforce system, is a standard that has been set to springboard success for Oklahoma’s business and employers and job seekers in reaching Oklahoma’s Goal of Wealth Generation.

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.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

Describe:

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 Visual Services outcomes, goals and indicators which pertain to the agency’s management of the vocational rehabilitation and supported employment programs and is outlined as follows.

For Federal Fiscal Years 2016 and 2017, the DSA began working under new regulations outlined by the WIOA. The new performance measures are:

Adult Measures
1. Employed in the 2nd quarter after exit
2. Employed in the 4th quarter after exit
3. Median earnings in the 2nd quarter after exit
4. Credential attainment
5. Skill gains
6. Service to employers/business

Youth Measures
1. Employed or in education or training in the 2nd quarter after exit
2. Employed or in education or training in the 4th quarter after exit
3. Median earnings in the 2nd quarter after exit
4. Credential attainment
5. Skill gains
6. Service to employer/business

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 is working towards a goal of a 60% success rate on case closures ending in 2018. 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 percentile. 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 Performance Management Process (PMP) counselor annual performance, case review instrument initiated in 2015 includes:

- Eligibility validated
- Counselor discussion with jobseeker - disability barriers, education or other factors, and labor market information
- IPE completion - timely manner
- Documentation
- Informed Choice decision making
- Comparable Benefit(s) identified
- Authorization procedures
- Comprehensive assessment matching employment goal
- Service(s) provision

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.

The DSA evaluates on a quarterly and annual basis for the VR and the Supported Employment programs. At quarterly State Rehabilitation Council meetings, a discussion of specific data elements, programs, services and activities are held between and among DSA staff and SRC members.

Strategies that contributed to the achievement of meeting goals and priorities include;

- Job Seekers successful closures increased
- Job Seekers wages increased upon employment
- DSA focuses monthly upon data and budgetary case management processes to assure priority group wait lists are limited or non-existent

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 business services model underdeveloped in focusing VR program goals and priorities
- DSA job placement specialists do not have defined, clear roles
- 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.

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.

Strategies that contributed to the achievement of meeting goals and priorities include;

- Increased number of contracted CRPs with DSA to assist individuals with significant barriers to employment achieve a successful employment outcome
- DSA’s partnership with DDS and State Employment Leadership Network (SELN)
• DSA’s partnership with ODMHSAS, including the pilot employment services contract, to assist individuals with serious mental illness achieve a successful employment outcome

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

Factors that impeded the achievement of meeting goals and priorities include;

• Lack of DSA contracted CRPs in rural areas of the state
• Lack of options for DSA employment contracts to meet the needs of all individuals with significant barriers to employment (i.e. Customized Employment; Intensive SE Services)
• Lack of joint contracted DSU/DDS CRPs
• DSA under Order of Selection for all priority groups

3. THE VR PROGRAM’S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA.

For Federal Fiscal Year (FFY) 2016 and 2017, the DSA did not meet Primary Indicator 1.2, under title I of the Rehabilitation Act of 1973. The following information describes the case management reporting structure for FFY 16 and 17.

1.1 Successful closure must be equal or exceed previous year.

FFY 15 =2300  
FFY 16=2125  
FFY 17=2014

1.2 Successful closures versus unsuccessful closures, at least 55.8%.

FFY 15 =49.53% 
FFY 16=53.85% 
FFY 17=49.94%

1.3 Competitive employed individuals equal to at least minimum wage, at least 72.6%.

FFY 15 =96.83%  
FFY16=98.26%  
FFY 17=97.27%

1.4 Competitively employed equal to at least the minimum wage, with significant disabilities, at least 62.4%.

FFY 15 =91.29%  
FFY 16=91.00%
FFY 17=91.02%

1.5 Average hourly earnings equal to at least minimum wage as a ratio to the State’s average hourly earnings, ratio is .52.

FFY 15 =.55
FFY 16=.59
FFY 17=.62

1.6 Competitively employed earning equal to at least minimum wage, reporting their income as largest single source at exit of program compared to percentage reporting their income as largest single source at application, level is difference of 53%.

FFY 15 =81.94%
FFY 16=79.93%
FFY 17=72.23%

2.1 The service rate for minority backgrounds compared to non-minority backgrounds, ratio of .80

FFY 15 =.94
FFY 16=.91
FFY 17=.91

The DSA failed Indicator 1.2, of the closed cases that received services, the percentage with an employment outcome. In addressing the failure of Indicator 1.2, the DSA will focus upon 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 is setting higher expectations through by utilizing more resources statewide, and connecting with more national initiatives and programs such as the Talent Acquisition Portal (TAP). The DSA will also focus on the new statewide increase in the Basic Living Requirement, and intensive technical assistance through internships.

The DSA is committed to meeting the performance accountability measures and working with core program partners, as outlined under section 116 of WIOA.

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED.

The DSA is vested in innovative and expansion activities by ensuring improved efficiency and service delivery through a system wide approach. Activities undertaken for Innovation and Expansion during FY 2017 totaled $3,782. Projects include, but are not limited to the following:
• Club Houses - Transitional Employment
• Educational Sponsorship
• Student Awards Banquet
• Conversational Spanish Classes
• Parent Advisory Board pilot
• Job Readiness Boot Camp
• Blood bank account for DRS
• Brainstorming for Success - A Transition Forum
• Walgreens Experiential Learning Project pilot
• Business Advisory Council
• Job Placement Expansion Tribal VR

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES.

Include the following:

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 pre authorized 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. 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 since 1987 to provide training for CRP staff. The Employment Consultant (EC) must complete the basic EC 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; Effective Training at Work; Job Development/Marketing; Job Club;
Online Introduction to Positive Behavior Supports in the Workplace (prerequisite for positive behavior supports and instructional supports); Positive Behavior in the Workplace, customized employment and instructional supports. Following completion of the required training listed above, six hours of continuing education is required each year. The DSA staff also provides quarterly training and two 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 highly challenged 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 highly challenged 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 18 months of onsite training and supports, the team identifies the individual’s needs and develops a plan for the transition to extended services.

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate: Oklahoma Department of Rehabilitation Services

Name of designated State agency
Full Name of Authorized Representative:  Noel A. Tyler
Title of Authorized Representative:  Executive Director

States must provide written and signed certifications that:

1. The designated State agency or designated State unit (as appropriate) listed above 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*, and its supplement under title VI of the Rehabilitation Act.** Yes

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the designated State agency listed above agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, 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; Yes

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*, the Rehabilitation Act, and all applicable regulations, 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;** Yes

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; Yes

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes

7. The Authorized Representative listed above 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; Yes

8. The Authorized Representative listed above has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes
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. Yes

FOOTNOTES

Certification 1 Footnotes

* Public Law 113-128.

** Unless otherwise stated, “Rehabilitation Act” means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

Certification 2 Footnotes

* All references in this plan to “designated State agency” or to “the State agency” relate to the agency identified in this paragraph.

** No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

*** Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

Certification 3 Footnotes

* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes

ADDITIONAL COMMENTS ON THE CERTIFICATIONS FROM THE STATE CERTIFICATION REGARDING LOBBYING — VOCATIONAL REHABILITATION

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding
of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Applicant’s Organization  Oklahoma Department of Rehabilitation Services

Full Name of Authorized Representative:  Noel A. Tyler

Title of Authorized Representative:  Executive Director

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT
Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

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If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Applicant's Organization: Oklahoma Department of Rehabilitation Services

Full Name of Authorized Representative: Noel A. Tyler

Title of Authorized Representative: Executive Director
ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: The State Plan must provide assurances that:

1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. SUBMISSION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the 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. ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

A. THE ESTABLISHMENT OF THE DESIGNATED STATE AGENCY AND DESIGNATED STATE UNIT, AS REQUIRED BY SECTION 101(A)(2) OF THE REHABILITATION ACT.

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 has established a State Rehabilitation Council.

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.


F. THE SHARED FUNDING AND ADMINISTRATION OF JOINT PROGRAMS, IN ACCORDANCE WITH SECTION 101(A)(2)(A)(II) OF THE REHABILITATION ACT.

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? See Section 2 of this VR services portion of the Unified or Combined State Plan. No.

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.

I. ALL REQUIRED METHODS OF ADMINISTRATION, AS REQUIRED BY SECTION 101(A)(6) OF THE REHABILITATION ACT.

J. THE REQUIREMENTS FOR THE COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT, AS SET FORTH IN SECTION 101(A)(7) OF THE REHABILITATION ACT.


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.
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:

A. COMPLY WITH ALL REQUIREMENTS REGARDING INFORMATION AND REFERRAL SERVICES IN ACCORDANCE WITH SECTIONS 101(A)(5)(D) AND (20) OF THE REHABILITATION ACT.

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.

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.

Agency will provide the full range of services described above

D. DETERMINE WHETHER COMPARABLE SERVICES AND BENEFITS ARE AVAILABLE TO THE INDIVIDUAL IN ACCORDANCE WITH SECTION 101(A)(8) OF THE REHABILITATION ACT.

E. COMPLY WITH THE REQUIREMENTS FOR THE DEVELOPMENT OF AN INDIVIDUALIZED PLAN FOR EMPLOYMENT IN ACCORDANCE WITH SECTION 102(B) OF THE REHABILITATION ACT.

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.

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.

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.

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

J. WITH RESPECT TO STUDENTS WITH DISABILITIES, THE STATE,

XXV. HAS DEVELOPED AND WILL IMPLEMENT,
A. STRATEGIES TO ADDRESS THE NEEDS IDENTIFIED IN THE ASSESSMENTS; AND
B. STRATEGIES TO ACHIEVE THE GOALS AND PRIORITIES IDENTIFIED BY THE STATE, TO IMPROVE AND EXPAND VOCATIONAL REHABILITATION SERVICES FOR STUDENTS WITH DISABILITIES ON A STATEWIDE BASIS; AND

XXVI. 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:

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.

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.

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:

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.
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:

A. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL PROVIDE SUPPORTED EMPLOYMENT SERVICES AS DEFINED IN SECTION 7(39) OF THE REHABILITATION ACT.

B. THE DESIGNATED STATE AGENCY ASSURES THAT:

XXVII. 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

XXVIII. 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.

ADDITIONAL COMMENTS ON THE ASSURANCES FROM THE STATE
States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and the Vocational Rehabilitation Program—and also submit relevant information for any of the eleven partner programs it includes in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program.* If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II and III of that document, where specified, as well as the program-specific requirements for that program (available on www.regulations.gov for public comment). The requirements that a State must address for any of the partner programs it includes in its Combined State Plan are provided in this separate supplemental document. The Departments are not seeking comments on these program-specific requirements, which exist under separate OMB control numbers and do not represent requirements under WIOA. For further details on this overall collection, access the Federal eRulemaking Portal at http://www.regulations.gov by selecting Docket ID number ETA-2015-0006.

* States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development and programs authorized under section 6(d)(4) and 6(o) of the Food and Nutrition Act of 2008 that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.
APPENDIX 1. PERFORMANCE GOALS FOR THE CORE PROGRAMS

Each State submitting a Unified or Combined Plan is required to identify expected levels of performance for each of the primary indicators of performance for the two years covered by the plan. The State is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education on state adjusted levels of performance for the indicators for each of the two years of the plan. States will only have one year of data available under the performance accountability system in Section 116 of the WIOA; therefore, the Departments will continue to use the transition authority under WIOA sec. 503(a) to designate certain primary indicators of performance as “baseline” indicators in the first plan submission. A “baseline” indicator is one for which States will not propose an expected level of performance in the plan submission and will not come to agreement with the Departments on negotiated levels of performance. “Baseline” indicators will not be used in the end of the year performance calculations and will not be used to determine failure to achieve adjusted levels of performance for purposes of sanctions. The selection of primary indicators for the designation as a baseline indicator is made based on the likelihood of a state having adequate data on which to make a reasonable determination of an expected level of performance and such a designation will vary across core programs.

States are expected to collect and report on all indicators, including those that have been designated as “baseline”. The actual performance data reported by States for indicators designated as “baseline” in the first two years of the Unified or Combined Plan will serve as baseline data in future years.

Each core program must submit an expected level of performance for each indicator, except for those indicators that are listed as “baseline” indicators below.

For this Plan, the Departments will work with States during the negotiation process to establish the negotiated levels of performance for each of the primary indicators for the core programs.

Baseline Indicators for the First Two Years of the Plan

Title I programs (Adult, Dislocated Workers, and Youth):

- Measurable Skill Gains
- Effectiveness in Serving Employers

Title II programs (Adult Education):

- Employment in the 2nd quarter
- Employment in the 4th quarter
- Median Earnings
- Credential Attainment
- Effectiveness in Serving Employers

Title III programs (Wagner-Peyser):
Effectiveness in Serving Employers

Title IV programs (Vocational Rehabilitation):

- Employment in the 2nd quarter
- Employment in the 4th quarter
- Median Earnings
- Credential Attainment
- Measurable Skill Gains
- Effectiveness in Serving Employers

States may identify additional indicators in the State plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the State indicators. Please identify any such State indicators under Additional Indicators of Performance.

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**TABLE 1. EMPLOYMENT (SECOND QUARTER AFTER EXIT)**

<table>
<thead>
<tr>
<th>Program</th>
<th>PY 2018 Expected Level</th>
<th>PY 2018 Negotiated Level</th>
<th>PY 2019 Expected Level</th>
<th>PY 2019 Negotiated Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adults</td>
<td>61.00</td>
<td>66.70</td>
<td>61.00</td>
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<td>Dislocated Workers</td>
<td>75.10</td>
<td>75.00</td>
<td>75.10</td>
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<td>Youth</td>
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<td>Wagner-Peyser</td>
<td>61.00</td>
<td>63.50</td>
<td>61.00</td>
<td>63.50</td>
</tr>
<tr>
<td>Vocational Rehabilitation</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
</tr>
</tbody>
</table>

User remarks on Table 1
Oklahoma will work with the Departments during the negotiation process to establish the negotiated levels of performance for each of the primary indicators for Program Year 2018 and Program Year 2019. For those performance indicators where there is insufficient data available on which to establish levels of performance, Oklahoma will continue to use baseline indicators determined by the Departments.

*Adult Education and Vocational Rehabilitation are not required to provide numbers per their federal partner contacts.

**TABLE 2. EMPLOYMENT (FOURTH QUARTER AFTER EXIT)**

<table>
<thead>
<tr>
<th>Program</th>
<th>PY 2018 Expected Level</th>
<th>PY 2018 Negotiated Level</th>
<th>PY 2019 Expected Level</th>
<th>PY 2019 Negotiated Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adults</td>
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<td>67.00</td>
<td>61.50</td>
<td>67.00</td>
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<tr>
<td>Dislocated Workers</td>
<td>73.90</td>
<td>73.90</td>
<td>73.90</td>
<td>73.90</td>
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<tr>
<td>Youth</td>
<td>62.70</td>
<td>62.70</td>
<td>62.70</td>
<td>62.70</td>
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<tr>
<td>Adult Education</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
</tr>
<tr>
<td>Wagner-Peyser</td>
<td>61.50</td>
<td>64.00</td>
<td>61.50</td>
<td>64.00</td>
</tr>
<tr>
<td>Vocational Rehabilitation</td>
<td>Baseline</td>
<td>Baseline</td>
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<td>Baseline</td>
</tr>
</tbody>
</table>

User remarks on Table 2

Oklahoma will work with the Departments during the negotiation process to establish the negotiated levels of performance for each of the primary indicators for Program Year 2018 and Program Year 2019. For those performance indicators where there is insufficient data available on which to establish levels of performance, Oklahoma will continue to use baseline indicators determined by the Departments.
*Adult Education and Vocational Rehabilitation are not required to provide numbers per their federal partner contacts.

### TABLE 3. MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)

<table>
<thead>
<tr>
<th>Program</th>
<th>PY 2018 Expected Level</th>
<th>PY 2018 Negotiated Level</th>
<th>PY 2019 Expected Level</th>
<th>PY 2019 Negotiated Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adults</td>
<td>4,664.00</td>
<td>5,200.00</td>
<td>4,664.00</td>
<td>5,200.00</td>
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<td>Dislocated Workers</td>
<td>6,084.00</td>
<td>7,600.00</td>
<td>6,084.00</td>
<td>7,600.00</td>
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<tr>
<td>Youth</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
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<tr>
<td>Adult Education</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
</tr>
<tr>
<td>Wagner-Peyser</td>
<td>4,664.00</td>
<td>5,200.00</td>
<td>6,446.00</td>
<td>5,200.00</td>
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<tr>
<td>Vocational Rehabilitation</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
</tr>
</tbody>
</table>

User remarks on Table 3

Oklahoma will work with the Departments during the negotiation process to establish the negotiated levels of performance for each of the primary indicators for Program Year 2018 and Program Year 2019. For those performance indicators where there is insufficient data available on which to establish levels of performance, Oklahoma will continue to use baseline indicators determined by the Departments.
Program PY 2018 Expected Level PY 2018 Negotiated Level PY 2019 Expected Level PY 2019 Negotiated Level

Adults 60.90 64.50 60.90 64.50

Dislocated Workers 56.80 59.10 56.80 59.10

Youth 44.50 46.40 44.50 46.40

Adult Education Baseline Baseline Baseline Baseline

Wagner-Peyser n/a n/a n/a n/a

Vocational Rehabilitation Baseline Baseline Baseline Baseline

User remarks on Table 4

Oklahoma will work with the Departments during the negotiation process to establish the negotiated levels of performance for each of the primary indicators for Program Year 2018 and Program Year 2019. For those performance indicators where there is insufficient data available on which to establish levels of performance, Oklahoma will continue to use baseline indicators determined by the Departments.

TABLE 5. MEASUREABLE SKILL GAINS

<table>
<thead>
<tr>
<th>Program</th>
<th>PY 2018 Expected Level</th>
<th>PY 2018 Negotiated Level</th>
<th>PY 2019 Expected Level</th>
<th>PY 2019 Negotiated Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adults</td>
<td>Baseline</td>
<td>Baseline</td>
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</table>
### User remarks on Table 5

Oklahoma will work with the Departments during the negotiation process to establish the negotiated levels of performance for each of the primary indicators for Program Year 2018 and Program Year 2019. For those performance indicators where there is insufficient data available on which to establish levels of performance, Oklahoma will continue to use baseline indicators determined by the Departments.

---

**TABLE 6. EFFECTIVENESS IN SERVING EMPLOYERS**

<table>
<thead>
<tr>
<th>Measure</th>
<th>PY 2018 Expected Level</th>
<th>PY 2018 Negotiated Level</th>
<th>PY 2019 Expected Level</th>
<th>PY 2019 Negotiated Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dislocated Workers</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
</tr>
<tr>
<td>Youth</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
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</tr>
<tr>
<td>Adult Education</td>
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<td>Wagner-Peyser</td>
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<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Vocational Rehabilitation</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
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</tr>
<tr>
<td>Measure</td>
<td>PY 2018 Expected Level</td>
<td>PY 2018 Negotiated Level</td>
<td>PY 2019 Expected Level</td>
<td>PY 2019 Negotiated Level</td>
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<tr>
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<tr>
<td>Line 6</td>
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User remarks on Table 6

Oklahoma finalized negotiations on Program Year 16 and Program Year 17 targets by the August 15 deadline.

---

**TABLE 7. ADDITIONAL INDICATORS OF PERFORMANCE**

<table>
<thead>
<tr>
<th>Measure</th>
<th>PY 2018 Expected Level</th>
<th>PY 2018 Negotiated Level</th>
<th>PY 2019 Expected Level</th>
<th>PY 2019 Negotiated Level</th>
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</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

User remarks on Table 7
APPENDIX 2. OTHER STATE ATTACHMENTS (OPTIONAL)

Wagner-Peyser Figure A

Wagner-Peyser Figure B