

**CENTRAL OKLAHOMA**  
**WORKFORCE INVESTMENT BOARD**

3813 N Santa Fe, Suite 135  
Oklahoma City, OK 73118  
405-622-2026

February 11, 2016

Deidre Meyers  
Deputy Secretary for Workforce Development  
Oklahoma Office of Workforce Development  
OSU-OKC  
900 N. Portland  
Oklahoma City, OK 73107

Dear Ms. Meyers,

Enclosed is a Modified Local Area Application for Initial Local Board Area Designation. The Central Oklahoma Workforce Development Area which has already received designation and consists of four counties, Canadian, Cleveland, Logan and Oklahoma, has been asked and agreed to creating a new workforce local area by combining with the five counties that formed the East Central Workforce Investment Area under WIA.

The application clearly demonstrates that this is a move that will enhance the delivery of services to customers, jobseekers, youth and businesses, in the new area. It will also help reduce some of the administrative cost by having one area instead of two. As you will note the areas have worked together on several strategic ventures in the past and have a familiar relationship that will prove to be the most seamless and least disruptive to service delivery in the former East Central area. Since COWIB already provides fiscal agent functions in the area and controls all facility leases, utility arrangements, and payments to a whole host of vendors, it only make sense that all of the five counties join in forming the new area. All five county officials who formed the Local Elected Officials of East Central are familiar with the COWIB staff and they are comfortable with our Local Elected Officials. Each of the five counties passed a resolution that stated they wanted to join the Central Area. This familiarity will aid in the transition and it has been communicated and understood by all the parties that every LEO will have an equal voice in appointing the new board as well as determining the budget.

The partnership among these additional five counties has existed for well over three decades, it certainly make sense that they be allowed to come in mass and work with the Central Area to create this new Workforce Development Area.

Respectfully,

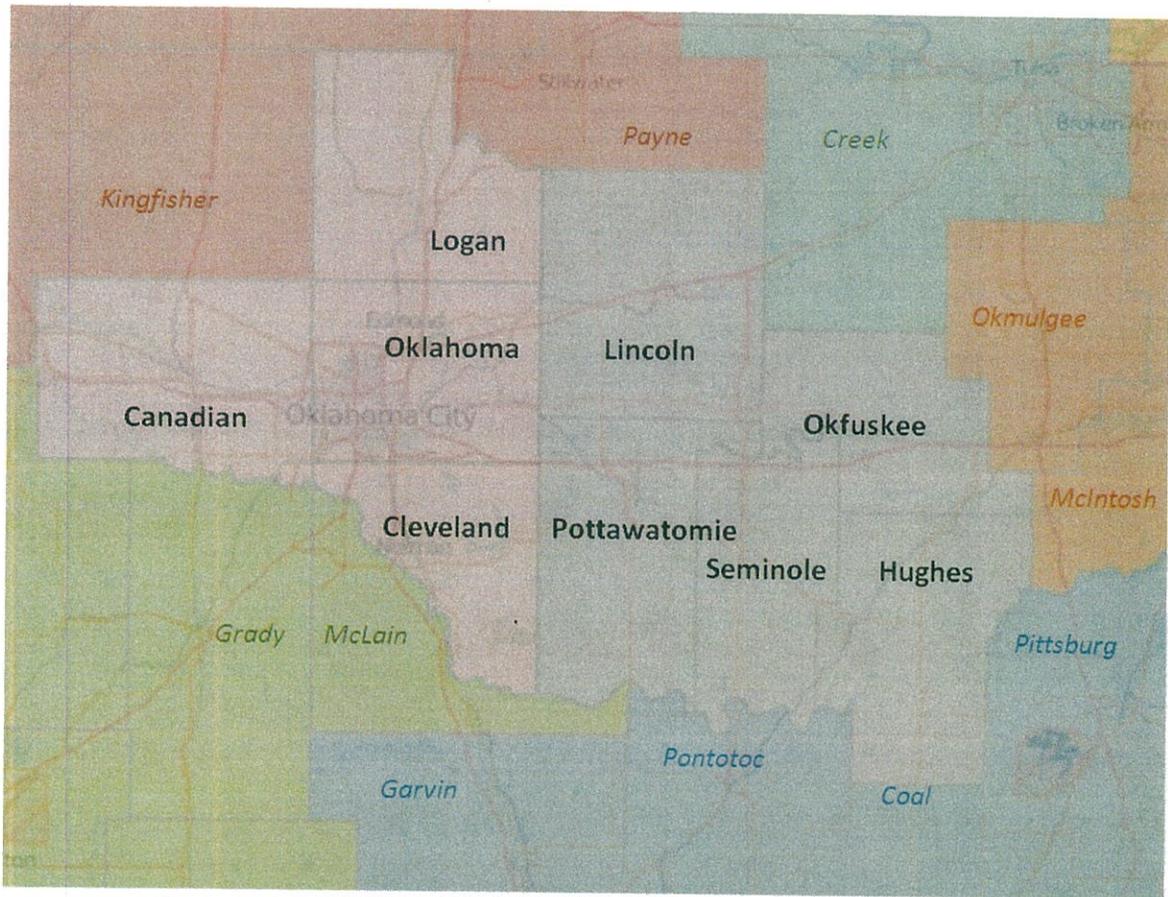
Eddie Foreman



# Modified Local Area

Application for Initial Local Board Area Designation

Program Year 2015-16



**Modified Local Area Application**  
**For**  
**Initial Local Area Designation**  
**Program Year 2015-16**

This application will serve as your request for initial designation as a Modified Local Workforce Development Area (local area) under the Workforce Innovation and Opportunity Act (WIOA) for Program Year (PY) 2015-16. Examples of modified local areas include two areas proposing to merge into a new combined single local area, various local areas that will be combined in a new, single local area, or a local area that will be expanded to include part or parts of another current local area.

If the Governor's Council for Workforce and Economic Development (State Board) determines the application is incomplete, it will either be returned or held until the necessary documentation is submitted. Please contact Jeane Burruss at [cjburru@osuokc.edu](mailto:cjburru@osuokc.edu) for technical assistance or questions related to completing and submitting this application.

**Combined 9-County Central & East Central Oklahoma Area**

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Name of Local Area

***c/o* COWIB, 3813 N. Santa Fe Ave., Suite 135**

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Mailing Address

**Oklahoma City, OK 73118**

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City, State

ZIP

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Date of Submission

**Eddie Foreman**

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Contact Person

**405-622-2031 or 405-622-2026**

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Contact Person's Phone Number

## Modified Local Area Levels of Performance

**Instructions:** For each local area that is associated with the newly modified local area, enter the local negotiated levels of performance and actual levels of performance for PYs 2012 and 2013.

Example 1: If Local Area A and Local Area B are proposing to merge into a new combined single local area, fill out one performance table for Local Area A and one performance table for Local Area B.

Example 2: If Local Area A will be expanded to include part or parts of Local Area B, fill out one performance table for Local Area A and one performance table for Local Area B.

Example 3: If three local areas will be combined into a new, single local area, fill out a separate performance table for Local Area A, Local Area B, and Local Area C.

| <b>Performance Table</b>                    |                               |                           |                               |                           |
|---|-------------------------------|---------------------------|-------------------------------|---------------------------|
| Name of Local Area: <b>Central Oklahoma</b> |                               |                           |                               |                           |
| <b>Common Measure</b>                       | <b>Negotiated<br/>PY 2012</b> | <b>Actual<br/>PY 2012</b> | <b>Negotiated<br/>PY 2013</b> | <b>Actual<br/>PY 2013</b> |
| <b>Adult</b>                                |                               |                           |                               |                           |
| Entered Employment Rate                     | 52%                           | 53.9%                     | 53.5%                         | 55.38%                    |
| Employment Retention Rate                   | 80%                           | 82.9%                     | 81%                           | 84.97%                    |
| Average Earnings                            | \$12,800.00                   | \$13,034.00               | \$13,000.00                   | \$13,065.48               |
| <b>Dislocated Worker</b>                    |                               |                           |                               |                           |
| Entered Employment Rate                     | 50%                           | 61%                       | 55%                           | 77.3%                     |
| Employment Retention Rate                   | 83%                           | 85.1%                     | 85%                           | 85.65%                    |
| Average Earnings                            | \$14,400.00                   | \$13,709.00               | \$14,450.00                   | \$13,750.32               |
| <b>Youth (ages 14-21)*</b>                  |                               |                           |                               |                           |
| Placement in Employment or Education        | 65%                           | 69.5%                     | 66%                           | 61.54%                    |
| Attainment of a Degree or Certificate       | 48%                           | 48.8%                     | 53%                           | 43.61%                    |
| Literacy and Numeracy Gains                 | 39%                           | 39.8%                     | 40%                           | 31.06%                    |

\*Note: For PY 2012-13, each local area's youth performance goals were the same as the State level goals.

## Performance Table

Name of Local Area: **East Central**

| Common Measure                          | Negotiated<br>PY 2012 | Actual<br>PY 2012 | Negotiated<br>PY 2013 | Actual<br>PY 2013 |
|---|-----------------------|-------------------|-----------------------|-------------------|
| <b>Adult</b>                            |                       |                   |                       |                   |
| Entered Employment Rate                 | 52%                   | 54.51%            | 53.5%                 | 54.02%            |
| Employment Retention Rate               | 80%                   | 77.81%            | 81%                   | 79.04%            |
| Average Earnings                        | \$12,800              | \$10,911.23       | \$13,000              | \$11,638.58       |
| <b>Dislocated Worker</b>                |                       |                   |                       |                   |
| Entered Employment Rate                 | 50%                   | 66.07%            | 55%                   | 82.61%            |
| Employment Retention Rate               | 83%                   | 85.04%            | 85%                   | 92.59%            |
| Average Earnings                        | \$14,400              | \$14,827.63       | \$14,450              | \$15,085.23       |
| <b>Youth (ages 14-21)*</b>              |                       |                   |                       |                   |
| Placement in Employment or<br>Education | 65%                   | 53.66%            | 66%                   | 40%               |
| Attainment of a Degree or Certificate   | 48%                   | 63.41%            | 53%                   | 38.10%            |
| Literacy and Numeracy Gains             | 39%                   | 61.54%            | 40%                   | 44.83%            |

\*Note: For PY 2012-13, each local area's youth performance goals were the same as the State level goals.

## Modified Local Area Narrative

A modified local area must submit a narrative to support an application for initial designation.

### 1. Local Area Modification Considerations

The following considerations represent the type of information a modified local area must submit in order to be initially designated. A local area must respond to the considerations below, and may provide additional information that substantiates the request and supports why the modification is beneficial to the local community.

- a. Describe how the modification will maintain or improve the performance of the new, modified local area.

**The modified local area will encompass 9 counties that are very similar in terms of their labor market and economic integration.**

**The area is defined by two currently existing local workforce areas:**

- ✓ **The Central Oklahoma workforce area is supported by local elected officials from Canadian, Cleveland, Logan, and Oklahoma counties. For the last 5 and a half years – since July, 2010, elected officials from these four counties have operated under a common Consortium Operations Agreement.<sup>1</sup>**
- ✓ **The East Central workforce area is supported by local elected officials from the other 5 counties in the proposed 9-county area – Hughes, Lincoln, Okfuskee, Pottawatomie, and Seminole. Elected officials from these 5 counties have worked with one another under a similar consortium agreement dating back to the turn of the millennium.**

**In terms of improving the performance of WIOA programs and One-Stop Partner programs, the outcomes are difficult to predict. However, it is fair to say that some administrative efficiencies will likely be realized – particularly in the functions of the local workforce board. For example, the consolidation of board staff will create an opportunity for more in-depth research and planning, more robust compliance monitoring, and more effective technical assistance to service providers. Additional opportunities for improvement will be explored to the fullest.**

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<sup>1</sup> Prior to 2010, the Central Oklahoma area was composed of only 3 counties – Oklahoma, Logan, and Canadian. Cleveland County was designated as its own local area.

- b. Describe how the modification will maintain or improve the fiscal integrity of the new local area.

**Our goal will be to maintain the excellent record of fiscal integrity that was achieved under the Central Oklahoma Workforce Investment Board (COWIB) and the East Central Workforce Impact Board (ECWIB).**

**We expect the transition to the new 9-county board to be expertly facilitated by the new Board of Local Elected Officials – who will be ultimately accountable for the proper expenditure of WIOA formula grant funds. It is likely that COWIB, Inc., will be designated as the WIOA Fiscal Agent for the new area. Presently, COWIB serves as the fiscal agent for both the Central and the East Central areas. This will give the new area an opportunity to build upon an existing track record of fiscal integrity and accountability.**

- c. Describe the resources available to administer WIOA activities in the new local area (e.g., what training and services are available? How does the boundary change influence existing partnerships and leveraged resources?).

**Cost savings are expected to be realized in administrative costs and board-related activities. This will leave more resources available for the delivery of Career Services, Training Services, and Business Services.**

**Over the course of many years, COWIB and ECWIB have developed strategic partnerships with One-Stop Partner agencies and others. Inevitably, these will be impacted by the merger of the two areas. We have already begun to identify the program areas in which partnership agreements will need to be re-aligned. We will examine changes that will be needed in the Memorandum of Understanding between the new board and the One-Stop Partners.**

**In many cases, it will be a simple matter to identify the One-Stop Partner agencies that deliver services in both of the present areas (COWIB and ECWIB). For those agencies, the process of coordination will be simplified by having one board (rather than two) serving the 9-county area.**

**We will address in detail a cost sharing model – identifying leveraged resources, as appropriate -- as we develop the new One-Stop Partner MOU for the 9-county area.**

- d. Describe how the boundary change will help a unit of general local government or combination of units produce a more comprehensive and integrated workforce development system (e.g., how will local economic development efforts improve? How will service delivery improve? How will coordination improve between local private industry efforts and local boards to create jobs or foster economic development?).

**The proposed 9-county area will fall within the boundaries of two regional economic development areas (EDA's), as designated by the Economic Development Administration of the U.S. Department of Commerce:**

- ✓ **The ACOG Economic Development District aligns perfectly with the four western-most counties of the new 9-county area.**
- ✓ **The Central Economic Development District (COEDD) encompasses the five eastern-most counties of the new 9-county area.**

**There is excellent regional cooperation between these two economic development areas. Private sector business drivers, such as the Greater Oklahoma City Regional Partnership, cross the boundaries between the EDA's – pushing closer cooperation among the public and private sectors. The new 9-county workforce development board will fit naturally within this economic development environment.**

**In terms of improving service delivery, the results can be imputed; but, the details cannot be known until the new board and the new LEO's have an opportunity to provide guidance to the system. We expect that the full range of service delivery options will be utilized – as described in Section 121(e) of the WIOA law. For example, an optimal number of physical One-Stop centers will be identified as well as specialized centers and a network of affiliate sites, as appropriate.**

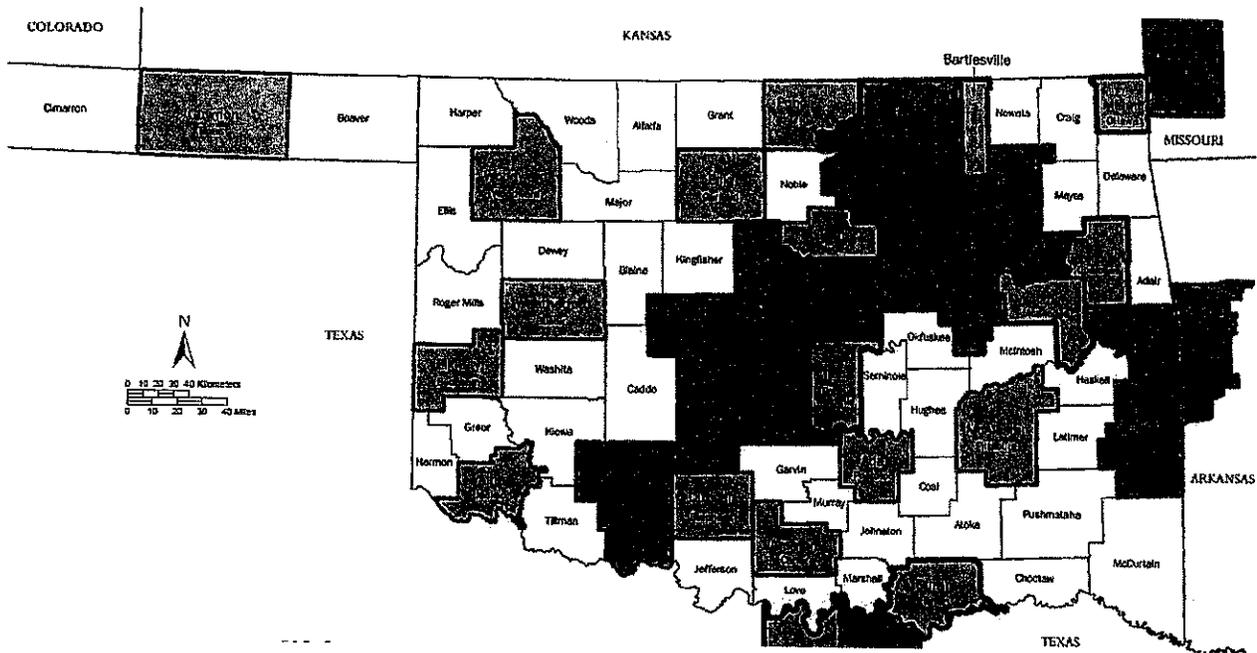
- e. **Identify the level to which the service area affected by the boundary change is consistent with the local labor market (e.g., how will the service area improve, shift, or impact the existing labor market area?).**

**To describe the local labor markets in our proposed 9-county area, we have examined the Core Based Statistical Areas that are described by the U.S. Census Bureau. (See map, next page).**

**The 6 western-most counties of the proposed 9-county workforce area are all within the Oklahoma City – Shawnee Combined Statistical Area (CSA). It is clear that these 6 counties are all a part of the same labor market area.**

**Furthermore, the 6 counties of the OKC – Shawnee CSA encompass about 96% of the population of the proposed 9-county area.**

**The three eastern-most counties – Hughes, Okfuskee, and Seminole – are the counties with the smallest populations. They are not part of any other Core Based Statistical Areas in the state. It is reasonable to include them in our proposed 9-county workforce area because they are related economically to the other counties in the COEDD economic development district.**



**The designation of our proposed 9-county workforce area will not, by itself, have an impact on the local labor markets. The dynamics of those markets are driven by normal business activities within the area. However, it may be confidently said that the new 9-county area will be highly aligned with the labor markets to be served. Within this context, there is a natural opportunity to expand and improve services to businesses and to job-seekers.**

- f. Provide any other narrative information that may be relevant to an objective assessment of the modification request.

**Several features of the proposed 9-county workforce area may be attractive to Governor Fallin and to members of the Governor’s Council for Workforce and Economic Development (GCWED).**

**First, the 9-county area represents the simplest and most direct path forward for the 5 counties of the East Central workforce area (which will no longer exist after June 30, 2016). By merging with the present Central area, the five counties of the old East Central area may be swiftly integrated into the new 9-county area through a simple process, including:**

- **Creation of a single new Consortium Agreement; and**
- **Appointing new members to a single new Local Workforce Development Board for the new 9-county area.**

**Any other alternative path – such as dividing the 5 counties and then assigning them to two or more other local workforce areas – would create the need for multiple new Consortium Agreements. Potentially, the membership and local governance agreements of several local workforce boards would be disrupted.**

**In this sense, a great deal of unnecessary work and effort may be avoided by merging all 5 counties of the East Central area into the present 4-county COWIB area.**

**Second, the Governor and GCWED may appreciate the fact that, within the existing Central and East Central workforce areas, there is a history of inter-local cooperation.**

**For example, the workforce investment boards from these two areas have engaged in regional planning exercises in the past. The two boards met in January, 2008, to participate in a joint strategic planning session in Shawnee. In 2011 – 2012, members of the two local workforce boards participated in an on-going series of discussions as part of a Regional Integration Grant sponsored by the U.S. Department of Labor.**

**Additionally, the areas share a common fiscal agent. The elected officials of the East Central area have designated the Central Oklahoma Workforce Investment Board (COWIB) to act as the fiscal agent for WIOA grant funds received by the East Central area. This is evidence that the elected officials of the 5-county East Central area have a considerable degree of trust in the capability of the COWIB's staff and leadership. It also reflects the inherent capacity of the two areas to work in close cooperation on WIOA-related duties.**

**Beyond serving as the fiscal agent for the present East Central area, COWIB also serves as the employer of record for the service delivery staff in the East Central area. Consequently, COWIB has a great deal of familiarity with program operations in the EC area. This is a real and practical advantage that would result from the designation of the new 9-county area.**

**Finally, the merging of the Central (CE) and East Central (EC) local areas will, for the first time, create a local workforce area that encompasses the entire expanse of the fifth Congressional District – including Oklahoma County, Pottawatomie County, and Seminole County.**

## 2. Geographic Boundaries

Describe the geographic modification to the affected local areas, including the exact boundary changes and how the boundary changes impact the populations of the local areas involved.

The area we recommend is made up of the following counties:

|                  |                 |                     |
|------------------|-----------------|---------------------|
| <b>Canadian</b>  | <b>Lincoln</b>  | <b>Oklahoma</b>     |
| <b>Cleveland</b> | <b>Logan</b>    | <b>Pottawatomie</b> |
| <b>Hughes</b>    | <b>Okfuskee</b> | <b>Seminole</b>     |

The counties within the proposed area are contiguous. They are economically linked by modern highway systems, with all counties having close proximity to Interstate 40.

Nearly 1.4 million people live in this 9-county local area:

| <u>County</u>   | <u>Population</u> | <u>Area</u>  |
|-----------------|-------------------|--------------|
| Canadian        | 129,582           | 906 sq. mi.  |
| Cleveland       | 269,908           | 558          |
| Hughes          | 13,823            | 815          |
| Lincoln         | 34,351            | 966          |
| Logan           | 44,422            | 749          |
| Okfuskee        | 12,377            | 629          |
| Oklahoma        | 779,623           | 718          |
| Pottawatomie    | 71,158            | 793          |
| <u>Seminole</u> | <u>25,426</u>     | <u>640</u>   |
| <b>TOTAL</b>    | <b>1,380,670</b>  | <b>5,868</b> |

Presently, this 9-county area is served by two workforce boards:

### **COWIB**

**Counties: Canadian, Cleveland, Logan, Oklahoma**

**Population: 1,223,535**

**Area: 2,025 square miles**

### **ECWIB**

**Counties: Hughes, Lincoln, Okfuskee, Pottawatomie, Seminole**

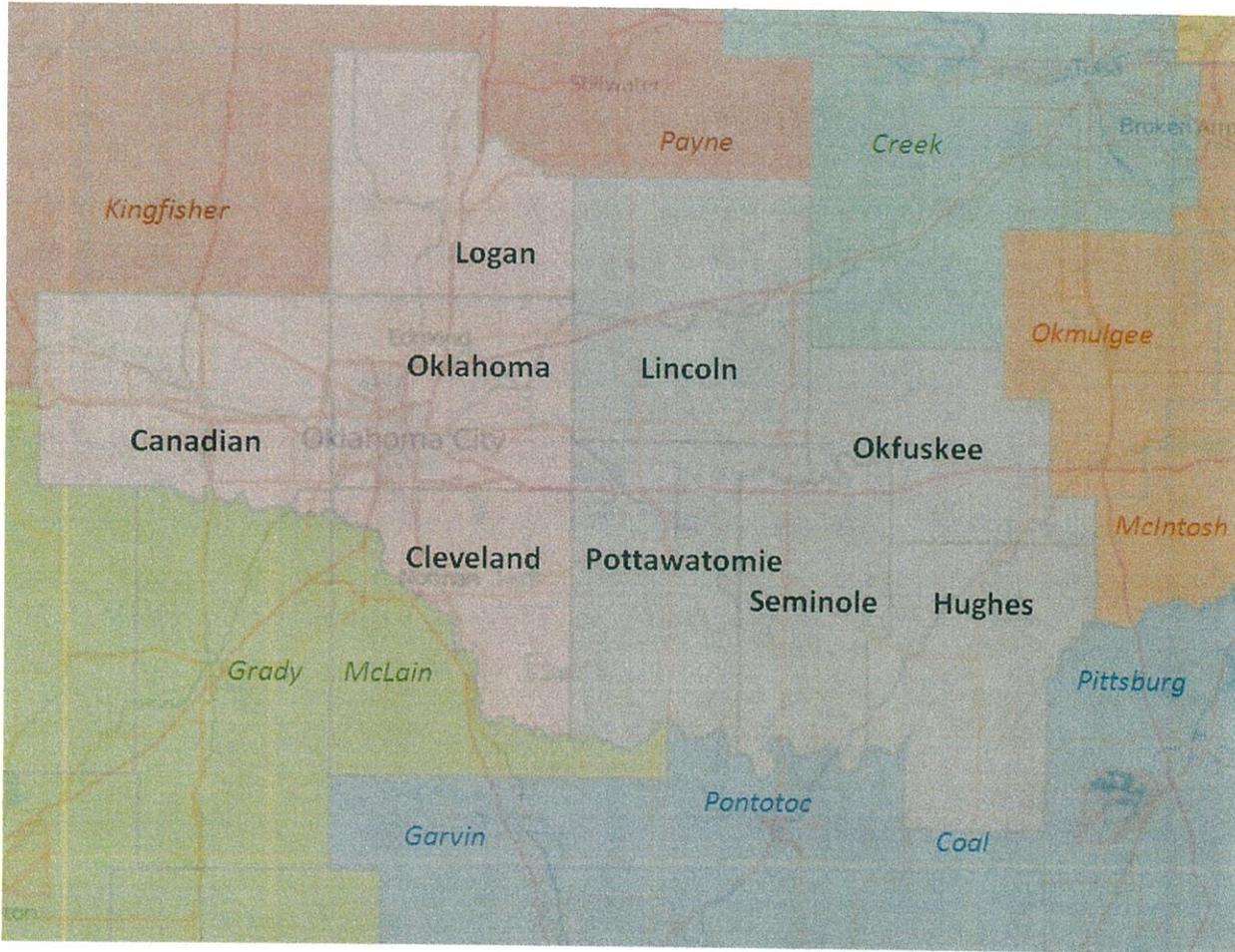
**Population: 157,135**

**Area: 3,843 square miles**

**As presently configured, each board serves a combination of urban and rural communities. Each area is influenced by a variety of economic and social conditions.**

**If the Governor accepts this application, the new area will continue to serve a variety of communities that are rich in their diversity. The new 9-county area will be served by a new board and a new cadre of local elected officials who are committed to achieving results for all communities within the area.**

**The boundaries of the new 9-county area are shown here:**



## Sustained Fiscal Integrity

The local area hereby certifies that it has not been found in violation of any of the following during either 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

**During PY 2012 – PY 2013, neither the COWIB nor the ECWIB areas were found to be in violation of specific requirements of the WIA law or regulations. There were no findings of mis-expended funds or willful disregard of any WIA requirements.**

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

**During PY 2012 – PY 2013, neither the COWIB nor the ECWIB areas were accused of gross negligence nor found guilty of gross negligence in any way.**

3. **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 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)]

**During PY 2012 – PY 2013, both the COWIB and the ECWIB areas observed all accepted standards of administration.**

## Local Area Assurances

Through PY 2015-16, the local area assures that:

- A. It will comply with the applicable uniform cost principles included in the appropriate circulars or rules of the Office of Management and Budget (OMB). [WIOA Section a. 184(a)(3)]
- B. All financial reporting will be done in compliance with federal and State regulations, and guidance (i.e., directives and information notices) issued by the Office of Workforce Solutions. Failure to comply with financial reporting requirements will be subject to potential cash hold. [29 Code of Federal Regulations (CFR) 97.21(g)]
- C. All close out reports will comply with the policies and procedures issued by the Oklahoma Office of Workforce Development.
- D. It will comply with the audit requirements specified in Title 2 CFR Subtitle A Chapter II Part 200 Subpart F. Failure to comply may result in sanctions imposed by the State.
- E. It will maintain and provide to auditors, at all levels, accounting and program records including supporting source documentation.
- F. No funds received under WIOA will be used to assist, promote, or deter union organizing. [WIOA Section 181(b)(7)]
- G. The local board will comply with the nondiscrimination provisions of WIOA Section b. 188, including the collection of necessary data.
- H. Funds will be spent in accordance with written Department of Labor guidance, and other applicable federal and State laws and regulations.
- I. Its procurement procedures will avoid acquisition of unnecessary or duplicative items, software, and subscriptions. (in alignment with 2 CFR Part 200.318)
- J. It will comply with future State Board (GCWED) policies and guidelines, legislative mandates and/or other special provisions as may be required under federal law or policy, including the WIOA or State legislation.
- K. Priority shall be given to veterans, recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient for receipt of career and training services funded by WIOA Adult funding. [WIOA Section 134(c)(3)(E) and Training and Employment Guidance Letter 10-09]
- L. If it is located within a planning region, it will meet the regional planning requirements in WIOA Section 106(c)(1).

## Application Signature Page

**Instructions:** The local CLEOs of all affected local areas must sign and date this form. Include the original signatures in the application package.

By signing the application below, the local CLEO requests initial designation as a modified local area. The local CLEO certifies that the local area has performed successfully and sustained fiscal integrity during PYs 2012 and 2013. Additionally, (s)he agrees to abide by the local area assurances included in this application.

Local Chief Elected Official(s):

**Rod Cleveland**

Name



Signature

**Chief Local Elected Official - COWIB**

Title

2-4-16

Date

**Melissa Dennis**

Name



Signature

**Chief Local Elected Official - ECWIB**

Title

2-8-16

Date

Name

Title

Signature

Date