



Oklahoma Office of Workforce Development
900 N. Portland Ave.
Oklahoma City, OK 73107

MEMORANDUM

DATE: January 23, 2018

TO: Workforce System Oversight Committee

FROM: Erin Risley-Baird, Executive Director

RE: Policies for Review and Approval

Attached are policies for your review and approval.

- **WIOA Section 188 Discrimination Complaint Procedures:** System policy. This policy was developed to ensure all EO and nondiscrimination complaints are processed consistently system wide. Creates separate policy from complaint processing procedures previously outlined in Nondiscrimination and Equal Opportunity policy. (attachment 2)
- **Non Discrimination and Equal Opportunity Policy, Change 2:** System policy. To issue additional communication requirements with the addition of a template, deletes references to complaint processing procedures outlined in new, separate policy, and updates reporting structure of Local EO Officers, clarifies sanction authority, and adds EO Officer conflict of interest language. (attachment 3)
- **Data Integrity, Change 1:** Performance policy. This policy change added requirements and procedures for confidentiality agreement for Personal Identifiable Information (PII) included in the OKJobMatch case management system. The policy also added a validation process for the local areas and the state to follow to ensure data is both reliable and valid. (attachment 4)
- **Data Validation Policy, Change 1:** Performance policy. This policy separates source documentation requirements by Youth, Adult and Dislocated Worker. Feedback was received from the local areas that separating these clarifies responsibilities for each program's performance. (attachment 5)
- **WIOA Core Performance, Change 1:** Performance policy. This change was created in response to the updated guidance received from USDOL in a Training and Employment Guidance Letter (TEGL). (attachment 6)
- **Supplemental Wage:** Performance policy. WIOA requires reporting median earnings after participants exit. For those participants who provide social security numbers, OESC is able to conduct wage matches to participants in their system to gather this data to report it to the Federal Government. Supplemental wage data collection allows reporting for those participants who do not provide social security numbers, and provides resources and procedures for how to do so accurately. (attachment 7)



- **Roles and Responsibilities:** System policy. Updated from Workforce Investment Act to Workforce Innovation and Opportunity Act. Outlines and provides resources on the roles and responsibilities of those in the Workforce Development System. (attachment 8)
- **WIOA Worksite Agreement:** Program policy. Updated from the Workforce Investment Act to the Workforce Innovation and Opportunity Act. As a response to a local area's request to revisit some of the language to be more responsive to businesses' concerns, multiple areas were reviewed to identify areas to increase flexibility. (attachment 9)
- **Grievance and Complaint Policy, Change 1:** System policy. A large discrepancy was noted in the timeframe for which to file complaints. One area stated 120 days, the other stated 30 days within the same policy. Changes were made to ensure the timeframe is consistent with 30 days—comparable to other states timeframe, offering a reasonable amount of time for issues to be reported, and administratively efficient time to provide responses and procedures. (attachment 10)