



OKLAHOMA WORKFORCE DEVELOPMENT ISSUANCE #07-2020

TO: Chief Local Elected Officials
Workforce Development Board Chairs
Workforce Development Board Staff
WIOA Service Providers

FROM: Don Morris, Executive Director

DATE: **Current Date**, 2020

SUBJECT: Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and Employment Services under the Wagner-Peyser Act, as amended by Title III of WIOA.

PURPOSE:

The Oklahoma Office of Workforce Development (OOWD), as the Governor's chosen Workforce Innovation and Opportunity Act (WIOA) administrative entity, provides this issuance as joint guidance to the local workforce development boards and core partners for the provision of services to adults and dislocated workers under WIOA Title I and individuals served by the Wagner-Peyser Employment Service (ES) program. This policy includes revisions to OWDI #19-2017, Change 1, which is rescinded by this issuance.

REFERENCES

- The Workforce Innovation and Opportunity Act of 2014, Titles I and III
- 20 CFR § 678 and § 680
- TEGL No. 19-16
- TEGL No. 10-09
- TEGL No. 10-16, Change 1
- TEGL No. 22-04 and TEGL 22-04, Change 1
- TEGL No. 03-18
- TEGL 08-19
- TEGL No. 15-12
- OWDI #15-2017
- OWDI #02-2019
- OWDI #03-2019
- OWDI #04-2020
- OWDI #08-2017, Change 2
- 38 U.S.C. 4213
- Section 101 of Title 10, United States Code

RESCISSIONS

OWDI #19-2017, Change 1

EXPIRATION DATE

Continuing



MESSAGE:

WIOA provides for a workforce system that is customer centered and accessible to all job seekers, and training that is job-driven. Oklahoma’s workforce system delivers career and training services in the Oklahoma Works American Job Centers (AJCs) across the state. The Adult, Dislocated Worker (DLW), and ES programs provide training and employment services in the AJCs, and are required programs by law. Under WIOA, partner programs and entities that are jointly responsible for workforce and economic development, educational, and other human resource programs, collaborate to create a seamless customer-focused AJC network that integrates service delivery across all programs to make it easier for individuals to access the services they need to obtain skills and employment.

INSTRUCTIONS FOR THE PROVISION OF SERVICES TO WIOA-ELIGIBLE ADULTS AND DISLOCATED WORKERS

WIOA section 134 authorizes employment and training activities for adults and dislocated workers, as defined below.

WIOA 3(2) defines an adult as an individual who is age 18 or older.

Dislocated Worker, defined at WIOA 3(15), means an individual who meets the requirements of one of the following categories:

Category 1: Recently Dislocated

An individual in this category:

- has been terminated or laid off, or has received a notice of termination or layoff, from employment, including a separation notice from active military service (under other than dishonorable conditions); and is either eligible for or has exhausted entitlement to unemployment compensation or has been employed for a duration sufficient to demonstrate, to the appropriate entity at an AJC as described in WIOA section 121(e), attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a state’s Unemployment Insurance (UI) law; and
- is unlikely to return to a previous industry or occupation.

Category 2: Plant Closure or Substantial Layoff

An individual in this category:

- has been laid off, or has received a notice of layoff, from employment as a result of any permanent closure of, or any substantial layoff at a plant, facility, military installation or enterprise. A substantial layoff is defined as any reduction-in-force that is not the result of a plant closing that results in an employment loss at a single site of employment during any 30 day period of at least 50 employees;
- is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; or,
- for purposes of eligibility to receive services other than training services, career services, or supportive services, is employed at a facility at which the employer has made a general announcement that such facility or military installation will close.

Category 3: Loss of Self-Employment Income

An individual in this category:

- was self-employed (including employment as a farmer, a rancher, a fisherman, or an independent contractor or consultant not technically an employee of a firm or agency); and
- is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters.

Category 4: Displaced Homemakers

An individual in this category:

- is no longer supported by income from a family member; and
- is unemployed or underemployed and experiencing difficulty in obtaining or upgrading employment.

Category 5: Military Spouses

An individual in this category is the spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of title 10, United States Code) who:

- has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member; or
- is unemployed or underemployed and experiencing difficulty in obtaining or upgrading employment.

Adult and DLW Eligibility and Program Enrollment Procedures

The enrollment process begins when an individual self-registers in the virtual case management system, known as OKJobMatch (formerly known as Oklahoma Service Link, or OSL). Once the self-registration has been completed, the demographic information entered will generate a potential eligibility determination. Staff must then meet with the applicant to review a snapshot of the information entered. Because the demographic snapshot will remain unchanged throughout program participation, information must be verified as accurate by the applicant's virtual self-attestation prior to staff entering the program enrollment. Additional information needed to determine eligibility must be requested at this time. Appropriate documentation of the information used to qualify the individual as eligible for enrollment in a WIOA program must be uploaded into the participant's virtual case file.

All pending enrollments and eligibility determinations are valid for 30 days only. At the end of 30 days the client is considered ineligible and will require a new eligibility determination. The enrollment date may not be backdated.

Although Adult and Labor Exchange (LE) enrollments do not require supervisory approval, DLW enrollments enter into a pending queue for supervisory approval when entered into OKJobMatch by front-line staff. DLW enrollments must be approved by a supervisor, verifying the client's eligibility including uploaded documentation, self-attestation, and program notes, before there is any expenditure of DLW funds. All DLW enrollments must be approved or denied by a supervisor within 30 days of the enrollment request or the request will be denied by state administrators. At this point eligibility must be re-determined and a new enrollment completed. If approved within the 30-day window, the enrollment date is the date the enrollment entered into the pending queue.

The Individual Employment Plan

Each individual enrolled in the Title I Adult or DLW program must have an Individual Employment Plan (IEP). The IEP is an ongoing strategy jointly developed by the WIOA participant and the Title I case manager to identify the employment goal(s), appropriate achievement objectives, and the appropriate combination of services to achieve the employment success of the individual. As adults and dislocated workers have diverse needs, each IEP must target the needs of the

individual for whom it is developed. Therefore, each IEP starts with an objective, comprehensive assessment. The purpose of the assessment is to identify an employment goal or career pathway for the individual, and to determine the skill levels and service needs necessary for the individual to obtain or retain employment.

Case managers are required to utilize the virtual IEP located in the Enrollment Details page of OKJobMatch. The initial IEP requires an entry for each of the 14 components, as they pertain to the individual for whom the IEP is developed. Additional goals and services necessary for the attainment and retention of successful employment must be added to the IEP as they are identified.

OKJobMatch provides the ability for the participant to virtually sign the IEP to acknowledge the plan was jointly developed by the participant and their case manager/career planner. Documents must be uploaded to OKJobMatch, as necessary, to support changes in the IEP, and the participant must always be given the option to receive a printed copy of the IEP when initially created and when updated/modified. [Details on the development of the Individual Employment Plan](https://oklahomaworks.gov/wp-content/uploads/2019/07/OWDI-03-2019_10.11.19.pdf) may be found at https://oklahomaworks.gov/wp-content/uploads/2019/07/OWDI-03-2019_10.11.19.pdf.

The IEP must be modified to reflect any deviations from the individual's employment and training goals. This includes a revised employment goal, extended training time, a new training provider, any gap in service, newly identified needs or barriers, and other such significant changes to the participant's plan. Modified IEPs require the signature/virtual attestation of the participant.

Case Management

Case management is defined as the coordination of services on behalf of the participant, including services provided by an AJC partner or a community based organization. Appropriate documentation of case management activities is essential to ensure provision of the comprehensive services necessary to achieve the participant's career objectives. As stated earlier, the comprehensive services and activities necessary for attainment and retention of successful employment must be described in the IEP. Additional client information related to eligibility, the need for WIOA services, and case management activities and updates that have not been included in the IEP must be documented in Case or Program Notes, including:

- The participant's employment status at program enrollment, including:
 - Details pertaining to the participant's current or most recent employment, including the name of the employer and employment end date, if appropriate, and
 - For participants who were laid off, the name of the company from which they were laid off and the date of the layoff.
- Attempts to contact the participant, in accordance with local policy, and the result of the attempted contact;
- The attainment of employment, including:
 - Employer name;
 - Date employment started;
 - Wage at hire
 - Benefits such as insurance and leave; and
 - How employment information was verified (pay stubs, employer contact, etc.);
- Any other activities and information pertinent to the achievement of the IEP, as determined by the LWDB; and
- Details regarding coordination of services and resources.

The use of funds from other sources for career or training services does not negate the responsibility of WIOA staff to maintain and document contact with participants enrolled in Adult or DLW Programs. The purpose of regular contact is to offer services, verify training progress, and ensure performance measures are attained, even when the cost of training is paid by another entity or program, such as a Tribal entity, Trade Adjustment Assistance (TAA), Temporary Assistance for Needy Families (TANF), Department of Rehabilitation Services (DRS), Adult Basic Education (ABE) providers, non-profit entities, or other community partners. OWDI #03-2019, Guidance for the Development of the Adult and Dislocated Worker Individual Employment Plan, requires that services provided by other entities, including but not limited to those listed above, must be documented in the IEP.

Career Services

WIOA authorizes career services for adults and dislocated workers, which must be made available in all comprehensive American Job Centers (AJCs). WIOA distinguishes three levels of career services: basic career services, individualized career services, and follow-up services, with no sequential requirement for these services. Career services under this approach provide local areas with the flexibility to target services to the needs of the customer, while still allowing for tracking of outcomes for reporting purposes. Career services may be provided in any order, recognizing each individual may not need all types of career services or may need different types of career services at different stages in their career pathway. The three categories of career services are defined in TEGL 16-16, One Stop Operations Guidance for the American Job Center Network. The categories are basic career services, individualized career services, and follow-up services.

Basic Career Services

Basic career services are accessible in all Oklahoma Works AJCs statewide and must be made available to all individuals seeking employment and training services. Basic career services may be provided by both the Adult and DLW programs, as well as through the labor exchange (LE) program services provided by the Wagner-Peyser (WP) staff of the Oklahoma Employment Security Commission (OESC). Self-service and Information Only basic career services do not trigger inclusion in participation for title I Adult and DLW programs or for the title III ES program. The [most recent WIOA Core Performance Measures policy](https://oklahomaworks.gov/wp-content/uploads/2019/09/OWDI-09-2017-Change-2-WIOA-Core-Performance-Measures-Policy.pdf) is found at <https://oklahomaworks.gov/wp-content/uploads/2019/09/OWDI-09-2017-Change-2-WIOA-Core-Performance-Measures-Policy.pdf>.

Individualized Career Services

As with basic career services, individualized career services are available in all Oklahoma Works AJCs. ES staff and WIOA title I staff may make individualized career services available, particularly for individuals with barriers to employment as defined in WIOA 3(24). Individualized career services are generally more time intensive than basic career services, and are customized to each individual's needs. Receipt of any individualized career service triggers participation and, therefore, performance. The following services are considered individualized career services:

- comprehensive and specialized assessments of skill levels and service needs, which may include:
- diagnostic testing and use of other assessment tools, and
- in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;
- development of the IEP;
- group counseling;
- individual counseling;

- career planning;
- short term-prevocational skills (for example, communication skills, interviewing skills, personal maintenance skills and professional conduct);
- internships and work experiences linked to careers;
- transitional jobs, as defined in the Work-based Training section of this issuance and at 20 CFR 680.190 and 195;
- workforce preparation activities;
- financial literacy services, such as those described in 29 USC 3164;
- out-of-area job search assistance and relocation assistance; or
- English language acquisition and integrated education and training programs.

If AJC staff or partners determine individualized career services are necessary for an individual to obtain or retain employment, these services must be made available to the individual, provided the individual meets the respective program eligibility requirements. Recent assessments, interviews or evaluations completed by workforce partner programs may be used by AJC staff to determine if individualized career services are appropriate or necessary for an individual. LWDBs must identify the assessments used to determine eligibility for WIOA services, and ensure eligibility determination procedures are consistent with this issuance and local policies. The provision of individualized career services must be based on the employment needs of the individual as determined jointly by the individual and the career planner, and must be documented in the IEP.

Individualized Career Services Provided by ES Staff

OESC has specific obligations in serving unemployment insurance (UI) claimants and carrying out components of the State's UI program, which include:

- Coordination of basic career services, particularly LE services;
- Targeting UI claimants for job search assistance and referrals to employment; Administering UI work test requirements, including obtaining and documenting relevant information for eligibility assessments and providing job search assistance and referrals to employment;
- Provision of referrals to UI claimants for training and education resources and programs, including but not limited to Pell Grants, GI Bill, Post 9/11 Veterans Educational Assistance, WIOA, higher education assistance, and Vocational Rehabilitation;
- Provision of application assistance to UI claimants for training and education resources and programs, including but not limited to Pell Grants, GI Bill, Post 9/11 Veterans Educational Assistance, WIOA, higher education assistance, and Vocational Rehabilitation;
- Outreach, intake (including identification through the State's Worker Profiling and Reemployment Services system of UI claimants likely to exhaust benefits and related programs, such as the Reemployment Services and Eligibility Assessment program), and orientation to information and other services available through the American Job Center network;
- Provision of information and assistance regarding filing claims under UI programs, including meaningful assistance to individuals (including individuals with language or other program access barriers) seeking assistance in filing a claim.
- Meaningful assistance means providing assistance:
 - In the AJCs, using staff who are well trained in UI claims filing activities, the rights and responsibilities of claimants, and information necessary to file a claim, or

- By direct linkage: via phone or other technology, such as live web chat and video conference, as long as the assistance is provided by appropriately trained and available staff and within a reasonable time;
- Technology-based approaches to providing meaningful assistance must ensure Oklahoma Works AJC customers have access to appropriately trained staff within a reasonable time. The referral of customers to the OESC self-service website or public phone line where an individual is placed into a queue with all other UI claimants is not meaningful assistance; and
- The cost associated in providing meaningful assistance may be paid for by OESC's UI administrative funding, the WIOA Adult or DLW programs, the ES program, or some combination of these funding sources.
- OESC provides training to staff statewide ensuring they can answer basic questions about an individual's claim. In addition, the online filing system (ONICv2) allows individuals easily accessible self-service options such as PIN reset, claim balance and payment detail, ability to view fraud or claimant error overpayments, appeals filing, multiple browser compatibility, print or mail 1099, and ability to view non-monetary determinations. Claimants can access these options anywhere there is internet, but specifically at the local office where staff will assist them in navigating the site and also answer questions about the claims process.

Follow-up Services

The third type of individualized career services is Follow-up Services, which must be provided for no less than 12 months after the first day of employment for Adult and DLW participants who are placed in, or have attained, unsubsidized employment. Local areas must establish policies to define what are considered to be appropriate follow-up services, including when to provide follow-up services to participants. Work place counseling (i.e., strategies for retaining employment) is an example of an appropriate follow-up service. Follow-up services occur after program exit and do not change, delay, or extend the exit date (TEGL No. 10-16, Change 1).

Training Services for Adults and Dislocated Workers

Training services are critical to the employment success of many adults and dislocated workers. When training is necessary to achieve the participant's employment goal(s), the training must be for an in-demand occupation as determined by the LWDB and, with certain exceptions, must be provided by an eligible training provider (ETP). The receipt of any training service triggers inclusion in participation for performance reporting purposes.

Types of training services that may be provided include:

- (a) Occupational skills training, including training for nontraditional employment;
- (b) On-the-job training (OJT) (§§680.700 – 680.730);
- (c) Incumbent worker training (WIOA 134(d)(4), §§680.780 - 680.820, and OWDI #09-2019);
- (d) Programs that combine workplace training with related instruction, which may include cooperative education programs;
- (e) Training programs operated by the private sector;
- (f) Skills upgrading and retraining;
- (g) Entrepreneurial training;
- (h) Transitional Jobs in accordance with WIOA 134(d)(5), §§ 680.190 and 680.195, and OWDI #22-2017;

- (i) Job readiness training provided in combination with the training services described in any of clauses (a) through (h), above;
- (j) Adult education and literacy activities, including activities of English Language acquisition and integrated education and training programs, provided concurrently or in combination with services provided in any of clauses (a) through (g); and
- (k) Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training (§§ 680.760 and 680.770).

The IEP must document the need for training services. With few exceptions, the need for training will be determined through an interview, evaluation, or assessment and career planning informed by local labor market information and training provider performance information, or through other career services the participant has received. However, there is no requirement for the provision of career services as a condition to receive training services. When career services are not provided prior to training, an interview with the participant must be documented to validate the reason why an upfront assessment or evaluation was not required. The interview should address any career planning activities completed by the participant that support direct placement in training services. Additionally, the need for training may be determined based on the provision of a partner entity's assessment(s) or when it has been determined that additional training is required to advance toward an established career pathway. Each step of a career pathway plan must be documented in the IEP.

As with the provision of career services, WIOA staff should use previous assessments or evaluations that have been conducted by another education or training partner to make training determinations, thus reducing duplication and developing enhanced alignment across partner programs. When an assessment completed by a workforce partner program is utilized to determine academic levels, skill levels, and service needs, the assessment score must be entered in the appropriate enrollment section of OKJobMatch for reporting purposes.

Under WIOA, training services may be made available to adults and dislocated workers who:

- After an interview, evaluation, or assessment and career planning activities by an AJC staff member or partner, are determined:
 - Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through career services alone;
 - In need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
 - Have the skills and qualifications to successfully participate in the selected program of training services;
- Select a program of training services directly linked to the employment opportunities in the local area or the planning region, or in another area to which the individual is willing to commute or relocate;
- Are unable to obtain other grant assistance for such services, including State-funded training funds, Tribal funds, TAA, TANF, or Federal Pell Grants, or require assistance beyond that available through other workforce partners, educational entities or other grant assistance programs, including Federal Pell Grants, State-funded training programs, Tribal entities, scholarships, and other sources of education and/or training funds. LWDBs and service providers must ensure the coordination of funds available to pay for training, taking into consideration the following:
 - Pell grants and other grant assistance must be utilized first for the cost of training and mandatory fees;
 - Title I funds may be used to supplement a Pell grant and/or other grant assistance that does not cover the entire cost of tuition and mandatory fees, but may not supplant a Pell or other grant assistance;

- Training services may be provided to an individual while an application for a Pell Grant is pending, as long as arrangements have been made with the training provider and the WIOA participant regarding allocation of the Pell Grant. If the individual is subsequently awarded a Pell Grant, the training provider must reimburse the local area the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including any tuition and education fees the training provider charged to attend training, from the Pell Grant award. Reimbursement is not required from the portion of the Pell Grant disbursed to the WIOA participant for other education-related expenses, per 20 CFR § 680.230;
- The full cost of participation in training services may be taken into consideration, including the cost of support services and other appropriate costs related to training program attendance, as defined by the LWDB;
- VA benefits for education and training services do not constitute “other grant assistance” under WIOA’s eligibility requirements. Therefore, eligibility for VA benefits for education or training do not preclude a veteran or the veteran’s eligible spouse from receiving WIOA funded services, including training funds. WIOA program operators may not require veterans or spouses of veterans to exhaust their entitlement to VA funded training benefits prior to allowing them to enroll in WIOA funded training;
- Individuals who are members of a group covered under a petition filed for TAA and are awaiting a determination may be co-enrolled in Adult and/or DLW programs. If the TAA petition is certified, the worker will transition to TAA approved training. If the petition is denied, the worker will continue training under WIOA; and
- For training services provided through the Adult funding stream, are determined eligible in accordance with the Adult Priority of Service as described in in this issuance and per local policy.

Documenting the Coordination of Funds and Resources

Students who are awarded Pell grants or other grant assistance may benefit from a combination of the Pell grant with WIOA training funds or WIOA-funded supportive services and/or needs-related payments, when the cost of training exceeds the amount of the Pell and any other financial aid. The local area must ensure sufficient documentation of the coordination of resources is maintained for each participant, including but not limited to, the following:

- whether an individual received a Pell grant or other grant assistance for the cost of training;
- for individuals not Pell eligible, the reason for ineligibility, e.g., the participant is in default status, the short term training program does not qualify, ineligibility due to household income, etc.;
- a list of all funding sources considered and the availability of the resource; and
- a list or budget of the participant’s estimated monthly living expenses used to determine financial need, excluding any costs associated with alcohol, cigarettes, and entertainment.

All local areas must implement local policies that are in alignment with this issuance, ensuring Federal Pell Grants and all other types of grant assistance for education and training services are utilized prior to WIOA Adult and DLW funds. WIOA funds utilized prior to a Pell or other grant assistance intended for education and/or training will be determined disallowed costs.

All assistance provided to individuals for education or training purposes, including assistance from other workforce partners, educational entities or other grant assistance, must be documented in the IEP. Eligible training providers must enter other financial aid on the Coordination of Training Funds (COTF) form, which is addressed further in the Individual Training Account section if this issuance. However, as training providers may not always be aware of all resources available to every individual, other funding streams/resources must be explored to ensure the participant is unable to

obtain grant assistance from other sources to pay for the cost of training. The local area must have a process in place to verify and document that no other resources or funding are available prior to the use of WIOA funds for training. When it has been verified that no other funding is available for training, a program note must be entered to document how the determination was made.

Serving Individuals in Default Status

WIOA programs and services must not be denied solely due to an individual's Federal Student Loan being in default status. However, workforce staff must counsel WIOA applicants and participants that training providers are not required to admit, enroll, or provide other financial assistance to individuals who are in default status.

Although WIOA funds cannot be utilized to help individuals get out of default, financial literacy services and the provision of information regarding repayment of student loans are recommended services for individuals in default status, prior to and during training funded with WIOA funds. Information regarding financial planning may be found on the [Oklahoma Money Matters](https://www.oklahomamoneymatters.org/) website: <https://www.oklahomamoneymatters.org/>.

Additionally, student loan repayment information is located on the [U.S. Department of Education site](https://studentaid.ed.gov/sa/repay-loans): <https://studentaid.ed.gov/sa/repay-loans>.

Individual Training Accounts

Individual Training Accounts (ITAs) are the primary method to be used for procuring training services under WIOA. An ITA is a payment agreement with an eligible training provider (ETP), established on behalf of an Adult or DLW program participant. Training services must be linked to in-demand occupations and must be provided in a manner that maximizes the individual's choice in the selection of a training provider. To accomplish this, each LWDB must make available an [Eligible Training Provider List \(ETPL\)](https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/) as described in <https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/>. Through consultation with the WIOA career planner, including discussion of program quality and ETP performance information, the program participant is able to make an informed choice when selecting a training provider and program. Once an individual has been determined eligible for training services and, in consultation with their case manager, selects an eligible training provider and program from the ETPL, a referral is made to the training provider and arrangements for payment of the training services are made through an ITA, utilizing an ITA Training Voucher.

Every effort should be made to establish the ITA in a timely manner once the individual has been determined eligible for Adult or Dislocated Worker training services. Once program eligibility has been determined, training funds must not be prorated after the ITA has been established and signed by the case manager and the participant. Lack of case management follow-through, regardless of the reason (e.g., staff shortages, case management mistakes, delayed approvals by the Service Provider when all information for eligibility has been provided, delays in processing payments, etc.), is not an acceptable reason to prorate payments. However, when an individual has been participating in a program of training prior to applying for title I Adult or DLW training services, the cost of training must be prorated to the date the ITA was signed by the participant.

Each LWDB and/or service provider must, to the extent possible, coordinate funding for ITAs with funding from other Federal, State, local, or private job training programs or sources to assist an individual in obtaining training services. Prior to the development of an ITA, an individual's "unmet need" must be determined. LWDBs may take into account

the full cost of participating in training services, including supportive services and other appropriate costs related to attendance in a training program, when determining an eligible individual's unmet need. Unmet need is defined as the cost of training not covered by grant assistance, educational entities, foundations, or other workforce partners. Unmet need must be documented on a Coordination of Training Funds (COTF) form, which is completed by the training provider. The cost of training supported by an ITA and the supportive services determined necessary to participate in career services and/or and training services, including needs related payments, may not exceed the participant's unmet need.

Eligible training providers (ETPs) offering short term training programs that are not Pell eligible generally document only the direct cost of training (i.e., tuition and mandatory fees, books, equipment, cost of exams and licenses, etc.) on the COTF form. In the event the COTF form indicates the training program is not Pell eligible and the unmet financial need equals the cost of attendance, the service provider may provide supportive services in excess of the amount documented as unmet financial need on the COTF as long as the supportive service(s) is required to allow the client to participate or continue in the approved program of training and is documented as a need in the participant's IEP. It must be noted that all ETPs must complete Section II of the COTF form, as stipulated in The Coordination of Training Funds Form section, below.

Examples of the ITA Agreement, ITA Voucher, and COTF form are included as attachments to this issuance. These forms may be modified by the local areas, as long as the local forms include, at a minimum, all information provided in the examples attached, and as required by this policy. The COTF form and the approved ITA Agreement and ITA Voucher must be uploaded as Enrollment Documents in OKJobMatch.

The Coordination of Training Funds Form

The COTF form, attachment C to this issuance, has been revised to reflect that local WIOA staff are not authorized to change information entered by the financial aid officer (or the training facility's appropriate designee) in Section II. If corrections are needed, the training provider is required to complete a new COTF form or the financial aid officer/designee may make corrections to the original COTF, initial each correction, and provide a new signature.

The process for completion of the COTF form is explained below:

- Section I of the COTF form must be completed by the WIOA case manager, signed by the WIOA participant requesting training, and sent to the financial aid office of the appropriate training entity.
- Section II must be completed by the financial aid officer (or the training entity's designated staff) and returned to the case manager. Section II must include all known financial resources, with the exception of loans and VA benefits for education and training.
- Section III is then signed by the case manager, attesting that WIOA funds are necessary for the completion of the individual's employment goal(s).

Training Contracts

Although ITAs are the primary method to be used for procuring training services, in certain circumstances a contract for training services may be developed instead of an ITA. Contracts for services may be used instead of ITAs when at least one of the circumstances below applies, and if the local area has fulfilled the consumer choice requirements of 20 CFR § 680.340. The contract exceptions to an ITA are:

- When the services provided are on-the-job training (OJT), customized training, incumbent worker training or transitional jobs;
- When the LWDB determines there are an insufficient number of eligible training providers in the local area to accomplish the purpose of a system of ITAs. Please note that the determination process must include a public comment period for interested providers of at least 30 days, and be described in the Local Plan;
- When the LWDB determines there is a training services program of demonstrated effectiveness offered in the area by a community-based organization or another private organization to serve individuals with barriers to employment. The LWDB must develop criteria to be used in determining demonstrated effectiveness, particularly as it applies to the individuals to be served and their specific barriers to employment. The criteria should include:
 - Financial stability of the organization;
 - Demonstrated performance in the delivery of services to individuals with barriers to employment through such means as:
 - program completion rates,
 - attainment of skills, certificates or degrees the program is designed to provide,
 - placement after training in subsidized employment, and
 - retention in employment; and
 - How the specific program relates to the workforce development needs identified in the local plan;
- When the LWDB determines it would be appropriate to contract with an institution of higher education or other provider of training services to facilitate the training of multiple individuals in in-demand industry sectors or occupations, provided the contract does not limit consumer choice; and
- When the LWDB is considering entering into a Pay-for-Performance contract and the LWDB ensures the contract is consistent with 20 CFR § 683.500 and § 683.510.

In addition to the contract exceptions to an ITA, a LWDB may determine that a combination of ITAs and contracts is an effective approach for placement into programs such as Registered Apprenticeship (RA) and other work-based training.

Priority Populations under WIOA

Across all titles, WIOA focuses on serving individuals with barriers to employment and seeks to ensure access to quality services for these populations. Priority and special populations for the Adult and DLW programs are addressed at 20 CFR §§ 680.600 through .660.

The term “individual with a barrier to employment” means a member of one or more of the following populations:

- Displaced homemakers;
- Low income individuals;
- Indigenous Americans, including individuals who identify as Native Americans or American Indians, Alaska Natives, and Native Hawaiians;
- Individuals with disabilities, including youth who are individuals with disabilities (as defined in sec. 3 of the Americans with Disabilities Act of 1990 (42 USC 12102) and individuals who are in receipt of Social Security Disability Insurance);
- Older individuals, defined as individuals who are age 55 and older;
- Ex-offenders;
- Homeless individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), or homeless children and youths (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)));

- Youth who are in or have aged out of the foster care system;
- Individuals who are:
 - English language learners (29 USC 3272(7));
 - Individuals who have low levels of literacy (for example, an individual who is unable to compute or solve programs, or read, write, or speak English at a level necessary to function on the job, or in the individual's family, or in society); and
 - Individuals facing substantial cultural barriers;
- Eligible migrant and seasonal farmworkers (as defined in WIOA 167(i)(1-3));
- Individuals within two years of exhausting lifetime TANF eligibility;
- Single parents (including single pregnant women); and
- Long-term unemployed individuals (unemployed for 27 or more consecutive weeks).

Please note that it is imperative to accurately collect and report each barrier to employment that pertains to a participant in the Adult and/or DLW program. The information is required for federal reporting purposes not only to categorize individuals into priority groups, but also to indicate the types of services each individual receives.

The Statutory Priority for Adult Funds

Section 134(c)(3)(E) of WIOA establishes a priority requirement with respect to funds allocated to a local area for adult employment and training activities. When using WIOA Adult funds to provide individualized career services and/or training services, title I staff must give priority to public assistance recipients, other low income individuals (as defined in WIOA section 3(36)), and individuals who are basic skills deficient (as defined in WIOA 3(5)). English language learners meet the criteria for "basic skills deficient" and must be included in the priority populations for the title I Adult program. Under WIOA, priority of service must be implemented regardless of the level of funds available to provide services in the local area.

The priority established in the previous paragraph does not necessarily mean that these services may only be provided to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. Local areas must establish written policies and procedures to ensure priority for the populations described in the paragraph above, for participants served in the WIOA Adult program. As part of regular monitoring and oversight responsibilities, OOWD staff is required to ensure all local areas have developed and implemented such policies, and that the policies demonstrate how priority of service is tracked for the groups. Additionally, local policies must include how self-sufficiency is determined for serving underemployed adults who fall into the priority categories. LWDBs may find the most recent [State guidance on self-sufficiency standards](https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/) at <https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/>.

Under WIOA, there is no exclusion of payments for unemployment compensation, child support payments, and old-age survivors' insurance benefits from the income calculations for determining if an individual is low-income. These exclusions, which were previously provided under WIA sec. 101(25), no longer apply.

Veterans and Adult Priority

Veterans and eligible spouses continue to receive priority of service for all DOL-funded job training programs, which include WIOA programs. As for the DLW program, the only priority of service is the veteran's priority of service. A veteran must, however, meet each program's eligibility criteria to receive services under the respective employment

and training program. For income-based eligibility determinations and for determining priority of service, military pay or allowances paid while on active duty or paid by the Department of Veterans Affairs (VA) for vocational rehabilitation, disability payments, or related VA-funded programs are not to be considered as income, in accordance with 38 U.S.C. 4213 and 20 CFR § 683.230.

When past income is an eligibility determinant for any Federal employment or training program, including the title I Adult and DLW programs, any amounts received as military pay or allowances by any person who served on active duty and certain other specified benefits, must be disregarded in making an eligibility determination. This applies to the veteran and to other individuals for whom those amounts would normally be applied, e.g., the military spouse. Military earnings are not to be included when calculating income for veterans or transitioning service members for priority of service, in accordance with 38 U.S.C. 4213. To further clarify, VA benefits for education and training services do not constitute “other grant assistance” under WIOA’s eligibility requirements. Therefore, eligibility for VA benefits for education or training services do not preclude a veteran or the veteran’s eligible spouse from receiving WIOA funded services, including training funds. Similarly, WIOA program operators may not require veterans or spouses to exhaust their entitlement to VA funded training benefits prior to allowing them to enroll in WIOA funded training.

Due to the statutorily required priority for Adult funds, priority must be provided in the following order:

- First, to veterans and eligible spouses who are also included in the groups given statutory priority for WIOA Adult formula funding. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient receive first priority for services provided with WIOA Adult formula funds for individualized career services and training services.
- Second, to non-covered persons (i.e., individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA Adult formula funds.
- Third, to veterans and eligible spouses who are not included in WIOA’s priority groups.
- Fourth, to priority populations established by the LWDB (for example, for non-covered persons who are not included in groups given priority for WIOA Adult formula funds, such as persons living within a designated Promise Zone).
- Last, to non-covered persons outside the groups given priority under WIOA.

Serving Separating Service Members and Military Spouses with Dislocated Worker Funds

Service members exiting the military, including, but not limited to, those who receive or are eligible for Unemployment Compensation for Ex-Military members (UCX), generally qualify as dislocated workers. Dislocated Worker funds under title I can help separating service members to enter or reenter the civilian labor force. A separating service member needs a notice of separation, either a DD-214 from the Department of Defense, or other appropriate documentation that shows a separation or imminent separation from the Armed Forces, to meet the required dislocated worker definition. While in most instances an individual will have to be eligible for or have exhausted entitlement to unemployment compensation in order to receive dislocated worker services, separating service members on a terminal leave from the military may be provided career services while the service member is still part of the Active Duty military, but has an imminent separation date, provided that their discharge will be anything other than dishonorable. It must be noted, however, that federal policy requires a separating service member to meet the dislocated worker requirement of being unlikely to return to his or her previous industry or occupation in the military. Training services, including WIOA funded RA placements, may not be provided until actual separation from the military has occurred.

Employment Status Clarification

Adult and DLW funds may provide career and training services to underemployed individuals according to the priority of service requirement described earlier in this issuance. Individuals who are underemployed may include those who are:

- Employed less than full-time who are seeking full-time employment;
- Employed in a position that is inadequate with respect to their skills and training;
- Employed and meet the definition of a low-income individual; and
- Employed with current earnings that are insufficient when compared to the individual's previous earnings from previous employment, per local policy.

The LWDB's self-sufficiency policy must address the area's procedures for serving adults and dislocated workers determined to be underemployed by local area standards. NOTE: USDOL's Fair Labor Standards Act (FLSA) does not define full-time employment or part-time employment. The minimum number of hours that constitute full-time employment is generally defined by the employer, but may not be less than an average of at least 30 hours per week, or 130 hours per month. Full-time employment often includes benefits not typically offered to part-time or temporary workers, such as annual leave, sick leave and health insurance. The attainment of self-sufficiency often depends on the availability of sick leave and health insurance.

Work-based Training

WIOA allows for additional work-based training options and flexibilities for adults and dislocated workers. Work-based training presents opportunities for fostering increased employer engagement, implementing sector strategies, and encouraging industry partnerships by allowing employers to train employees while continuing to be productive members of the workforce. Transitional Jobs, Registered Apprenticeships, On-the-Job Training, Incumbent Worker Training, and Customized Training are examples of work-based training.

Transitional Jobs

Transitional jobs are a type of work experience LWDBs may provide under WIOA and are considered to be an individualized career service. Transitional jobs are time-limited, wage-paid work experiences that are only available for individuals with barriers to employment who are chronically unemployed or have an inconsistent work history, as determined by the LWDB. Further, transitional jobs must include both comprehensive and supportive services. [Transitional jobs policy](https://oklahomaworks.gov/wp-content/uploads/2017/10/OWDI-22-2017-Transitional-Jobs.pdf) is located at <https://oklahomaworks.gov/wp-content/uploads/2017/10/OWDI-22-2017-Transitional-Jobs.pdf>.

Registered Apprenticeship (RA)

Registered apprenticeship is a potential source for training and employment services local areas are encouraged to use as a career pathway for individuals seeking employment, and as a job-driven strategy for employers and industries. WIOA provides an opportunity for RA programs to be more directly connected to the public workforce system. RA programs automatically qualify to be placed on the Eligible Training Provider List (ETPL), if they so choose, allowing ITAs to support WIOA eligible participants in RA programs, and more directly connect those programs to Oklahoma Works American Job Centers.

OOWD is committed to fully integrating RA programs as an employment and training solution for the State's AJCs. Local areas have maximum flexibility in serving participants and supporting their placement into pre-

apprenticeship training and RA programs, including making arrangements with RA programs to initiate applications to become an apprentice on behalf of participants.

There are several ways in which training services may be used in conjunction with RA programs for individuals determined eligible for WIOA title I services:

- An ITA may be developed for a participant to receive RA training.
- An on-the-job training (OJT) contract may be developed 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 is allowed.
- Incumbent worker training may be used for upskilling apprentices or journey workers who already have an established working/training relationship with the RA program, provided the requirements of WIOA 134(d)(4) are met.
- Local areas may include supportive services, in conjunction with career and/or training services, to participants in an RA program, provided the supportive services are consistent with WIOA section 134(d)(2), section 12 of TEGL No. 19-16, this issuance, and local policies.
- In all instances, a participant's eligibility for WIOA must be properly established and documented prior to the commitment of funds for RA programs.

Complete and accurate reporting of RA participation is vital to both the State's sector strategy and career pathways approaches. Participants who are placed into an RA with WIOA funds or individuals in an RA at the time of program entry must be clearly identified. An individual in an RA at the time of program entry must identify at the time of registration in their demographic as a registered apprentice. If on-the-job training or skill upgrading is provided as part of a RA program, Registered Apprenticeship must be entered as the training service in the participant's Service & Training Plan.

On-the-Job Training (OJT)

OJT continues to be a key method for delivering training services to adults and dislocated workers. Locals may provide up to 50 percent of the wage rate of the participant to employers for the costs of training while the participant is in the program. For local areas to increase the reimbursement level up to 75 percent, the following factors must be taken into account:

- The characteristics of the participants, taking into consideration whether they are individuals with barriers to employment as defined in WIOA 3(24);
- The size of the employer, with an emphasis on small businesses;
- The quality of 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); and
- Other factors the LWDB may determine appropriate such as, the number of employees participating in the training, wage and benefit levels of the employees, including both pre- and post-participation earnings, and relation of the training to the competitiveness of the participant.
- LWDBs must document the factors used in either Case or Program notes, when deciding to increase the wage reimbursement levels above 50% and up to a maximum of 75%.

Incumbent Worker Training (IWT)

Incumbent Worker Training is designed to meet the special requirements of an employer, or a group of employers within the same industry, to retain a skilled workforce or avert the need to lay off employees. Incumbent workers benefit by acquiring the skills necessary to retain employment and/or advancement within the company, or by acquiring the skills necessary to avert a layoff. IWT must be conducted with a commitment by the employer to retain or avert the layoff of the incumbent worker or workers participating in the training. IWT is governed by 20 CFR 680.780 – 680.820. [State guidance on incumbent worker training](https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/) is located at <https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/>.

Customized Training

Customized training is designed to meet the specific requirements of an employer or group of employers with the commitment that the employer(s) hire a participating individual or individuals upon successful completion of the training. The employer must pay for a significant portion of the cost of training, as determined by the LWDB. The local board must identify in their policy what constitutes the employer payment, taking into account the size of the employer and other factors the LWDB determines are appropriate, which may include the number of employees participating in the training, wage and benefit levels of those employees (at present and anticipated upon completion of the training), relation of the training to the competitiveness of a participant, and other employer-provided training and advancement opportunities.

Local workforce areas should note that both OJT and customized training are excluded from the credential attainment performance indicator because they rarely result in a credential. However, LWDBs are encouraged to consider OJT and customized training programs that do result in a credential, whenever possible.

Supportive Services

A key principle in WIOA is to provide local areas with the authority to make policy and administrative decisions and the flexibility to tailor the workforce system to the needs of the local community. To ensure maximum flexibility, this guidance provides local areas the discretion to provide the supportive services they deem appropriate, subject to the limited conditions prescribed by WIOA. Supportive services are designed to provide a participant with the resources necessary to participate in career services and/or training services. Supportive services may be made available to anyone participating in title I career services (excluding follow up career services) or training services.

LWDBs, in consultation with AJC partners and other community service providers, must develop written policies and procedures for the provision of supportive services. Local supportive services policy must:

- ensure the services are necessary to participate in title I activities;
- ensure the supportive services are WIOA-funded only when these services are not available through other agencies or partners;
- address how supportive services will be funded when they are not otherwise available from other sources;
- address procedures for referrals to supportive services;
- address how duplication of resources and services will be prevented;
- establish limits on the amount and duration of these services; and
- describe any exceptions to the limits on the amount or duration of supportive services.

To ensure the highest quality and most comprehensive service provision possible, supportive services funds may be utilized in coordination with career and training services provided by other partner programs and entities jointly responsible for workforce and economic development, educational, and other human resource programs. For example, title I supportive services funds may be utilized when the cost of training is paid by a workforce partner if the partner entity does not have available funds for supportive services and when the supportive services are not available from other sources.

When all other avenues have been explored for necessary supportive services, it may also be appropriate for WIOA title I supportive services funds to be coordinated with a partner entity's supportive services, if the partner indicates their supportive services funding is in danger of depletion prior to the end of the time period for which the funds are intended. This practice will help ensure that neither the local workforce development area nor the community partner exhausts their supportive services funds during their respective periods of funding. The details of this arrangement must be documented in the Combination of Services to Overcome Needs/Barriers section of the IEP, as well as in program notes.

When WIOA funds are utilized for supportive services, details of the type(s) of supportive services provided and why the services were necessary for the individual's participation in career or training services must be documented in the Supportive Service Needs section of the virtual IEP. There must also be an entry in the Service and Training (S&T) section of OKJM when supportive services are provided. Additionally, uploaded support documentation must include the supportive service request/voucher, the local area's verification or certification that no other services are available, and any other documentation required by local policy.

Supportive Services may include, but are not limited to:

- Assistance with transportation;
- Assistance with child care and dependent care;
- Linkages to community services;
- Assistance with housing;
- Assistance with educational testing;
- Reasonable accommodations for individuals with disabilities;
- Referrals to health care;
- Assistance with uniforms or other appropriate work attire and work-related tools, including items such as eye glasses and protective eye gear;
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in post-secondary education classes;
- Payments and fees for employment and training-related applications, tests, and certifications;
- Legal aid services; and
- Needs-Related Payments (available only to individuals enrolled in training services and must be consistent with specific criteria as indicated in 20 CFR § 680.940 for Adult program participants and in § 680.950 for DLW program participants).

Needs-Related Payments

Needs-related payments are a form of supportive services designed to provide a participant with financial assistance for the purpose of enabling them to participate in training services. Many individuals in need of training services lack the resources to meet their non-training expenses and therefore cannot participate in the training needed to attain

employment. Needs-related payments can help individuals meet their non-training expenses and help them to complete training successfully. The maximum levels of needs-related payments for Adult program participants must be established by the LWDB and must be consistent with 20 CFR § 680.970.

To be eligible to receive needs-related payments, Adult program participants must:

- Be unemployed;
- Not qualify for, or have ceased to qualify for, unemployment compensation; and
- Be enrolled in a training program described in this issuance and section 134(c)(3)(D) of WIOA.

To receive needs-related payments, dislocated workers must:

- Be unemployed, and:
 - have ceased to qualify for unemployment compensation or trade readjustment allowance under TAA; and
 - be enrolled in a training program described in section 134(c)(3) of WIOA by the end of the 13th week after the most recent layoff that resulted in a determination of the worker’s eligibility for employment and training activities for dislocated workers; or if later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months; or
- Be unemployed and:
 - did not qualify for unemployment compensation or trade readjustment assistance under TAA; and
 - be enrolled in a program of training services under WIOA 134(c)(3).

Needs-related payments for dislocated workers must not exceed the greater of:

- the applicable weekly level of the unemployment compensation benefit, for participants who were eligible UI as a result of the qualifying dislocation; or
- for participants who did not qualify for UI benefits as a result of the qualifying layoff, an amount equal to the poverty level for an equivalent period, which must be adjusted to reflect changes in total family income, as determined by LWDB policies.

Career and Training Services Performance Accountability

In order to align service delivery across the core WIOA programs and ensure a comprehensive approach across all partners, core performance measures and reporting elements are described in [current guidance](#) found at <https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/>.

Coordination with Trade Adjustment Assistance

The Trade Adjustment Assistance (TAA) program, coordinated by OESC, provides additional benefits for dislocated workers laid off by companies that are directly affected by increased imports or certain shifts of production to other countries. Upon notification that USDOL has certified a business as “trade impacted”, affected individuals should contact the local Oklahoma Works AJC for TAA information.

DOL requires WIOA/TAA dual enrollment and the development of IEPs for TAA participants. Coordination between the title I case manager and OESC’s TAA staff is essential to ensure successful training completion, and allows for the timely provision of individualized career services while improving the effectiveness of the TAA Program. Therefore, the TAA

program will utilize the virtual IEP located in the TAA Enrollment Details page of OKJobMatch and will follow the WIOA IEP policy, with a few exceptions. As with IEPs developed for all adults and dislocated workers, all significant changes to the initial plan require the IEP to be updated/modified. The revised IEP must be signed/acknowledged by the participant.

TAA will cover 100% of tuition, course fees, books and required supplies, and equipment for eligible participants. However, TAA funds will not cover supportive services such as transportation and child care assistance. When ES staff identify any supportive needs necessary for the success of TAA participants, they are required to refer TAA-eligible individuals to appropriate title I staff. WIOA staff must then provide supportive services as per this issuance and local supportive services policy.

Other Permissible Local Activities

WIOA provides significant flexibility to local areas when providing services with Adult and DLW funds. In addition to the required career and training services, local areas may use these funds to provide additional job seeker services and business services, as well as to facilitate enhanced coordination between other partner programs and entities at the State and local levels. Local areas may also use these funds to develop new types of technical assistance, develop new intake procedures, test new procurement methods which may lead to better outcomes for jobseekers, and ensure provision of robust services for businesses throughout the workforce system. A list of permissible local activities is found in WIOA 134(d) and section 17 of TEGL No. 19-16. [Oklahoma's Business Services policy](https://oklahomaworks.gov/wp-content/uploads/2020/02/OWDI-01-2020-Business-Services-policy-w-Business-Engagement-Attachment.pdf) may be found at <https://oklahomaworks.gov/wp-content/uploads/2020/02/OWDI-01-2020-Business-Services-policy-w-Business-Engagement-Attachment.pdf>.

Rapid Response

The purpose of Rapid Response is to promote economic recovery and vitality by developing ongoing, comprehensive approaches to identifying, planning for, or responding to layoffs and dislocations, and preventing or minimizing their impacts on workers, businesses, and communities. Rapid Response encompasses the strategies and activities necessary to plan for and respond as quickly as possible following an announcement of a closure or layoff, or to a natural or other disaster which results in mass job loss. Rapid Response delivers services to enable dislocated workers to transition to new employment as quickly as possible. [Oklahoma's Rapid Response Activities and Layoff Aversion policy](https://oklahomaworks.gov/wp-content/uploads/2019/07/OWDI-14-2017-Change-1-Rapid-Response-Activities-and-Layoff-Aversion.pdf) may be found at <https://oklahomaworks.gov/wp-content/uploads/2019/07/OWDI-14-2017-Change-1-Rapid-Response-Activities-and-Layoff-Aversion.pdf>.

EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT: All Recipients, and Sub-recipients/Sub-grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions, which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

ACTION REQUIRED: This Oklahoma Workforce Development Issuance (OWDI) is to become a part of your permanent records and made available to appropriate staff and sub-recipients.

INQUIRIES: If you have any questions about this issuance, please [contact Staff in the Oklahoma Office of Workforce Development](http://www.oklahomaworks.gov/about/). Contact information can be found at <http://www.oklahomaworks.gov/about/>.

ATTACHMENTS:

Attachment A: Individual Training Account Form

Attachment B: Individual Training Account Voucher Form

Attachment C: Coordination of Training Funds (COTF) Form