

**State of Oklahoma
Workforce Investment Act
Waiver Request**

Inclusion of Youth Follow-Up Services as a Youth Program Framework Service

The Oklahoma Employment Security Commission (OESC), as the administrative entity of the Workforce Investment Act (WIA) in the State of Oklahoma, submits this request for a general waiver to allow follow-up services to be provided as part of the youth program design framework services, without need for a separate competitive procurement process.

WIA Section 123 stipulates that eligible providers of youth services be selected by awarding a grant or contract on a competitive basis. WIA Regulations 20 CFR 664.405 further clarifies that this competitive procurement requirement does not apply to the design framework component, such as services for intake, objective assessment and the development of individual service strategy, when these services are provided by the grant recipient/fiscal agent. Grant recipient/fiscal agents that are already providing framework services to youth (as allowed under 664.405) are in a better position to also provide follow-up services to these same youth. The requirement of an additional competitive bidding process for follow-up services is duplicative and burdensome. This waiver would create a more streamlined and cohesive approach to case management by allowing these providers of youth framework services to provide personal attention to each youth on a consistent basis throughout their service strategy.

This waiver request adheres to the format provided in WIA Section 189(i)(4)(B) and WIA Regulations 20 CFR 661.420(c).

1. Statutory or Regulatory Requirement to be Waived

WIA Section 123 (29 U.S.C. 2843), WIA Section 117(h)(4)(B)(i) (29 U.S.C. 2832), and 20 C.F.R. Part 664.405 which require that eligible providers of youth services be selected by awarding a grant or contract on a competitive basis for all youth activities and services.

2. State or Local Statutory or Regulatory Barriers

There are no existing state or local statutory or regulatory barriers to implementing this waiver. Upon notification of approval of this waiver, OESC will incorporate it into policy and distribute the new policy to Local Workforce Investment Boards (LWIBs).

3. Goals and Expected Programmatic Outcomes of this Waiver

This waiver will maximize resources by allowing grant recipient/fiscal agent staff who are already providing framework services to provide follow-up services to youth, instead of requiring a separate competitive bidding process. Granting the waiver will allow for greater continuity of service and monitoring of progress of the youth as they move through the various services identified within their individual service strategy. The waiver will allow for a smoother flow of data that documents the delivery of youth services, as well as the outcomes that result from youth participation, since the organization that is providing framework services will be in a better position to understand where each youth is in relationship to his or her

Individual Service Strategy, when a youth has exited a WIA service or the WIA program, and when the period for follow-up begins.

Additionally, granting the waiver will support the implementation of common performance measures, since the framework service provider will be in the best position to know when a WIA youth is also participating in another partner program, and therefore will be able to make a better administrative judgment as to when program completion will trigger the time period to determine a performance outcome under the common measures.

4. Individuals Affected by this Waiver

- This waiver will affect WIA eligible youth.
- The WIA Grantee/Fiscal Agent will benefit from not having to procure a provider of follow-up services.

5. Processes Used to:

Monitor the Progress in Implementing the Waiver

OESC, as the administrative entity of the WIA in the State of Oklahoma, will be responsible for monitoring the implementation and impact of this waiver. OESC will provide policy and guidance through an agency issuance if this waiver is approved. Oversight of the policy that will result from this waiver will be incorporated into the administrative entity's monitoring procedures.

Provide Notice to any Local Board Affected by the Waiver

This request was developed as a result of concerns expressed by local areas in order to streamline the case management approach by allowing these providers of youth framework services to provide personal attention to each youth on a consistent basis throughout their service strategy. Prior to submission of this waiver request, OESC will inform all LWIBs of its intent via an email memorandum with this waiver request attached.

Ensure Meaningful Public Comment on the Waiver Request

Prior to the submission of the waiver request, OESC will disseminate this waiver request to local WIB chairs and staff and to members of the Governor's Council for Workforce and Economic Development (including representatives of organized labor and business). OESC will also post this waiver request on their website with opportunity for public comment during a two-week period.