

COWIB Policy on Service Integration

Pursuant to Oklahoma Employment and Training Issuance #03-2007, Change 1

Revised December, 2008

Approved by the Central Oklahoma Workforce Investment Board – March 19, 2008

PURPOSE: To describe the minimum standards for service integration that will apply to the delivery of services through the local workforce investment system in the Central Oklahoma area.

AUTHORITY: The authority for this policy derives from Oklahoma Employment and Training Issuance (OETI) #03-2007, **Change 1**, “Local Workforce Integration Policy,” as published by the Oklahoma Employment Security Commission on March 24, 2008. The OETI, as a statement of State Policy, has the purpose of providing:

“...Guidance for the development of local Workforce Integration Policy including the state minimums that must be included in the policy.”

Additionally, the OETI provides that, “LWIBs must review and use this guidance to develop board policy for integration in their Local Workforce Investment Area.”

BACKGROUND: The Workforce Investment Act, in section 117, establishes that local boards have certain limited duties with regard to the operation of the one-stop delivery system in their local area. As described by OETI #03-2007, **Change 1**:

“...The responsibility for demand driven, skills-based, integrated service delivery clearly belongs to the LWIBs.”

At the same time, OETI #03-2007, **Change 1**, describes how the State of Oklahoma has acted to facilitate the implementation of integrated service delivery models at the local level. The following statement appears in the “Background” section of OETI #03-2007, **Change 1**:

“In July 2005 the Oklahoma Employment Security Commission (OESC) implemented a comprehensive reorganization of its state-level staff to move from a focus on the operation of silo programs to a focus on quality integrated service delivery....

“The goals of this reorganization were to:

- *Improve access to quality services through service and program integration*

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- *Support the linkages between workforce programs and economic development by developing shared goals and emphases*
- *Implement the intent of the Governor’s Council and the State Strategic Plan for comprehensive workforce system integration*
- *Provide a framework to empower and support the Workforce Investment Board’s (LWIB) integration of Wagner-Peyser and WIA Title I Adult program operations at the local level*
- *Reduce duplication and seek efficiencies in a time of limited resources*

“This state-level reorganization was viewed as the first phase of a broader, more comprehensive integration of Wagner-Peyser and WIA Adult and Dislocated Worker programs. While integration with all workforce system partners remains a goal, it was important to give immediate attention to the integration of the two major program partners under OESC’s umbrella which, in most cases, continues to act as the backbone of Workforce Center operations.”

STATE & FEDERAL REQUIREMENTS: In developing a local policy on Service Integration, the Central Oklahoma Workforce Investment Board, its One-Stop Operator, and One-Stop Center staff must be mindful of the requirements and limitations that are imposed by our State and Federal funding sources.

Federal Policy: The federal requirements regarding service integration are primarily defined in the WIA Final Regulations. For example, the preamble to the Regulations describes how the integration of activities and information is expected to result in improved services for system customers:

“WIA reforms Federal job training programs and creates a new, comprehensive workforce investment system. The reformed system is intended to be customer-focused, to help Americans access the tools they need to manage their careers through information and high quality services, and to help U.S. companies find skilled workers. This new law embodies seven key principles. They are:

“ -- Streamlining services through better integration at the street level in the One-Stop delivery system. Programs and providers will co-locate, coordinate and integrate activities and information, so that the system as a whole is coherent and accessible for individuals and businesses alike.”

[Emphasis added]

Elsewhere in the Preamble, the U.S. Department of Labor (DOL) describes the “unprecedented opportunity” that is embodied in the new system of service delivery that is envisioned in the Workforce Investment Act:

“We wish to emphasize that DOL considers the reforms embodied in the Workforce Investment Act to be pivotal, and not ‘business as usual.’ This legislation provides an unprecedented opportunity for major reforms that can result in a reinvigorated, integrated workforce investment system. States and local communities, together with business, labor, community-based organizations, educational institutions, and other partners, must seize this historic opportunity by thinking expansively as they design a customer-focused, comprehensive delivery system.”

There is a general expectation that increased integration of services will result in an improved customer experience for job seekers and businesses:

“The Act’s requirements build on reform efforts that are well established in all States through the Department’s One-Stop grant initiative. Rather than requiring individuals and employers to seek workforce development information and services at several different locations, which is often costly, discouraging and confusing, WIA requires States and communities to integrate multiple workforce development programs and resources for individuals at the ‘street level’ through a user friendly One-Stop delivery system. This system will simplify and expand access to services for job seekers and employers.”

An important goal of the Workforce Investment Act is to provide “universal access” to the core services of the local workforce development system. Integration of services is seen as a central strategy for achieving universal access:

“The WIA goal of universal access to core services is achieved, among other strategies, through close integration of services provided by the Wagner-Peyser, WIA adult and dislocated worker partners and other partners in the One-Stop center and system.”

Even though the WIA Regulations place a great deal of emphasis on the importance of service integration, there is also a recognition that there are limits to the integration of some program functions. One of the limitations that is explicitly addressed in the WIA Regulations is an issue regarding the delivery of Wagner-Peyser Act¹ services. The Regulations describe a requirement for “labor exchange services” to be delivered by merit-staff employees.

Here is an excerpt from the Preamble to the WIA Final Regulations that deals with this issue:

¹ The federal Wagner-Peyser Act was first passed in 1933, and it is still in effect (having been amended by the Workforce Investment Act of 1998). The Act created the United States Employment Service. The stated purpose of the Wagner-Peyser Act is, “To provide for the establishment of a national employment system and for cooperation with the States in the promotion of such system, and for other purposes.”

Source: http://www.doleta.gov/programs/w-pact_amended98.cfm

“Subpart C--Wagner-Peyser Act Services in a One-Stop Delivery System Environment

“Part 652, subpart C, describes requirements for the establishment and functioning of State Wagner-Peyser Act services in a One-Stop delivery system environment. Governors must designate a State agency responsible for administering Wagner-Peyser Act funds as a distinct funding source. The rule requires that the State agency retain responsibility for, and oversight of, all Wagner-Peyser Act labor exchange services provided through the One-Stop delivery system.”

In Oklahoma, the Oklahoma Employment Security Commission (OESC) has been designated as the State agency responsible for administering Wagner-Peyser Act funds.

The WIA Regulations, as described in the Preamble, make it clear that only State merit-staff employees of the OESC may deliver “job finding, placement, and reemployment services” funded under the Wagner-Peyser Act:

“Delivery of Wagner-Peyser Act Services by State Merit-Staff Employees

“We received several comments about the Secretary's authority under sections 3(a) and 5(b) of the Wagner-Peyser Act to require the delivery of labor exchange services by merit-staff employees. Section 652.215 of the final regulations reflects the Department's authority under the Wagner-Peyser Act... to require that job finding, placement, and reemployment services funded under the Wagner-Peyser Act, including services to veterans, be delivered by State merit-staff employees.

“Two commenters suggested that Sec. 652.215 be clarified to stipulate that Wagner-Peyser Act services must be delivered by merit-staff employees of a State agency. Three commenters suggested that the interpretation of the merit-staffing requirement be broadened specifically to include units of general local government.

“Response: After carefully examining and considering all of the comments received, we have revised Sec. 652.215 to make clear that Wagner-Peyser Act services must be delivered by merit-staff employees of a State agency. Since the beginning of the Federal-State Wagner-Peyser Act program, we have required that annual State Wagner-Peyser Act service plans include a merit system of personnel administration. To ensure consistency in the application of merit personnel systems and to promote greater statewide administrative efficiency, merit-staff employees of the State agency must deliver Wagner-Peyser Act services, as a condition for receipt of grants. We have determined that State agency merit-staffing preserves and maintains competence, impartiality, and nonpartisanship in the administration of

Wagner-Peyser Act services to job seekers and employers as part of the One-Stop delivery system....”

This limitation on the delivery of labor exchange services has important ramifications that must be considered in the context of the COWIB’s local policy on service integration. In particular, there is a corresponding limitation on the ability of the COWIB or its One-Stop Operator to provide supervision to OESC employees who are working in the local workforce development system in Central Oklahoma.

Here’s how the WIA Regulations discuss the issue:

“Guidance by the One-Stop Operator

“One commenter suggested that the provision in Sec. 652.216 which limits the ability of a One-Stop operator, other than the State agency, to provide only guidance to State agency merit-staff employees is contrary to the concept of service integration by preventing the operator from providing supervision to all employees in the One-Stop center.....

“Response: The focus of these comments was on whether the word ‘guidance’ in Sec. 652.216 gives the One-Stop operator too little or too much control over State agency employees. After careful consideration of the comments, we are retaining the term ‘guidance’ to describe the level of supervision of State merit-staff employees by the One-Stop operator. This term best reflects the appropriate relationship that should exist between a non-State agency One-Stop operator and State merit-staff employees funded under the Wagner-Peyser Act in the day-to-day operation of the One-Stop center. To ensure consistency with collective bargaining agreements, we have revised Sec. 652.216 to allow the One-Stop operator to provide guidance to merit-staff employees of the State agency consistent with the provisions of the Wagner-Peyser Act, the local MOU, and applicable collective bargaining agreements.”

Consequently, one of the parameters of service integration that must be given attention by the COWIB is the degree to which the COWIB’s One-Stop Operator will be permitted to provide “guidance” to OESC employees who are working in Central Oklahoma’s local workforce development system.

Here is how the limitations on supervision of State merit-staff employees are described in Section 652.216 of the Wagner-Peyser Regulations:

“Sec. 652.216 May the One-Stop operator provide guidance to State merit-staff employees in accordance with the Act?

“Yes, the One-Stop delivery system envisions a partnership in which Wagner-Peyser Act labor exchange services are coordinated with other

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activities provided by other partners in a One-Stop setting. As part of the local Memorandum of Understanding, the State agency, as a One-Stop partner, may agree to have staff receive guidance from the One-Stop operator regarding the provision of labor exchange services. Personnel matters, including compensation, personnel actions, terms and conditions of employment, performance appraisals, and accountability of State merit-staff employees funded under the Act, remain under the authority of the State agency. The guidance given to employees must be consistent with the provisions of the Act, the local Memorandum of Understanding, and applicable collective bargaining agreements.”

State Policy: Oklahoma Employment and Training Issuance #03-2007, **Change 1**, offers the state’s most comprehensive policy guidance on “service integration.” A copy of the complete OETI is appended to this local policy statement.

OETI #03-2007 describes several important steps that have been taken by the OESC to promote service integration:

“In November and December of 2005, LWIB Directors, Workforce Center Managers, WIA Directors, Employment Service (ES) Area Managers, private sector LWIB members, and Chief Local Elected Officials (CLEO) were all invited to sessions designed to assist local integration efforts. Greg Newton, a nationally recognized consultant, assisted OESC in ensuring a common understanding of the definition and expectations of ‘service integration’ shared the benchmarks to be used to determine the degree to which local areas have achieved WIA/WP integration, provided an overview of what other States, LWIBs and Workforce Center Managers were doing, shared a customer flow model for consideration, and sought input into steps OESC should take to promote service integration at the local level.

“Based on the input from these audiences, OESC made a number of changes, including:

- *Ensuring Oklahoma Service Link will assist the integration process by allowing service delivery to be as paper free as possible*
- *Permitting OESC local center staff to be functionally supervised by WIA staff under certain, appropriate conditions*

“Then in March 2006, OESC presented a one day session to LWIB members and staff, describing the State’s shift to a skill-based service delivery system, defining service integration, offering ideas to bring about integration, and clarifying the LWIB’s leadership roles and responsibilities in this initiative.”

It is notable that OETI #03-2007, **Change 1**, gives implicit permission for OESC employees to be “functionally supervised by WIA staff under certain, appropriate conditions.” This statement indicates that the OESC has accepted that the COWIB’s One-Stop Operator may provide a broad degree of *guidance* to the OESC’s merit-staff employees in the Central Oklahoma area – up to and including *functional supervision*.

In addition to a description of steps already taken, OETI #03-2007, **Change 1**, does two more things. One, it recognizes that local workforce investment boards have responsibility for creating, designing and supporting a “demand driven, skills-based integrated service delivery” system. And, two, it establishes a list of minimum standards for the integration of WIA and Wagner-Peyser services in Oklahoma.

LOCAL POLICY:

It shall be the policy of the Central Oklahoma Workforce Investment Board (COWIB) and its Board of Local Elected Officials (LEO) that all Workforce Investment Act Title I-funded services shall be delivered in a manner that fully complies with the WIA law and regulations.

Minimum Standards. Pursuant to Oklahoma Employment and Training Issuance #03-2007, **Change 1**, the Central Oklahoma Workforce Investment Board will design, support, and maintain an integrated One-Stop service delivery system that meets or exceeds the following standards:

(1) The COWIB will designate at least one comprehensive center with integrated WIA Adult, WIA Dislocated worker, and Wagner-Peyser programs.

OETI #03-2007, **Change 1**, states: “Before making this designation the LWIB needs to consider virtual services opportunities; anticipated future ES and WIA funding levels; ensuring adequate WIA and ES staff in designated centers; and procuring not just WIA services, but integrated services where WIA staff may be functionally supervised by others.”

The COWIB’s Two-Year Plan for the period beginning October 1, 2007, describes how the local workforce development system in Central Oklahoma is anchored by two full-service One-Stop Career Centers. They are:

The Career Connection Center (also known as, “Eastside Center”)

7401 NE 23rd Street

Oklahoma City, OK

Telephone: (405) 713-1890

FAX: (405) 713-1898

<http://www.oklahomacounty.org/TGA/JobSeeker/JobSeeker.htm>

OKC Reno Center

416 Hudiburg Circle, Suite B

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Oklahoma City, OK 73108

Telephone: (405) 639-3640

Fax: (405) 639-3682 and 639-3683

http://www.workforceok.org/wfcenters/OKC_Reno/default.htm

Comprehensive One-Stop Career Centers in Oklahoma provide access to a full range of services pertaining to employment, training and education, employer assistance, and guidance for obtaining other assistance:

- Core Services are available and include, but are not limited to, labor market information, initial assessment of skill levels, and job search and placement assistance.
- Intensive Services are available to eligible unemployed individuals who have completed at least one core service, but have not been able to obtain employment, or employed individuals needing additional services to obtain or keep employment that will lead to personal self-sufficiency.
- Training Services are available to eligible individuals who have met the requirements for intensive services and have not been able to obtain or keep employment. Individual Training Accounts (ITA) are established to finance training based upon the individual's choice of selected training programs.

In future years the number and/or location of comprehensive centers may change -- as the COWIB responds to anticipated future ES and WIA funding levels, staffing levels, and virtual services opportunities.

(2) The COWIB will designate a Center Manager for each comprehensive, integrated center.

The COWIB's Chief Executive Officer will designate a Center Manager for each of the COWIB's comprehensive centers utilizing a process to be designed by a committee of the Board.

The COWIB's Two-Year Plan for the period beginning October 1, 2007, describes how the One-Stop Operator will provide management functions for these centers in coordination with the COWIB's staff:

“The Contractor will provide staff to assume the role and responsibility of the One-Stop Operator in the Central Oklahoma Workforce Investment Area. The staff will become the center manager of the Workforce Center opening in the first quarter of program year 2006 located at 416 Hudiburg Circle. Their efforts will be coordinated with the Board's staff to ensure the Board's mission and vision for the workforce development system is implemented. This staff will supervise all staff assigned to work in this workforce center. The Operator will be working to gain the support of the business community while increasing the status and influence of COWIB within the business sector. They will be working to increase the placement opportunities for jobseekers and increase the number of job seekers

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placed. The contractor will be working with COWIB to develop new services for jobseeker customers that will meet the needs identified by the employer community. Some of these services may be on a fee basis.

“The role of the One-Stop Operator is equivalent to that of a managing partner. In the role, the operator identifies issues that need to be addressed that have to do with service delivery. The Operator works with collocated partners to form a solution, but is empowered to make the final call when a decision cannot be reached or when timing to make a decision requires an immediate decision.

“The One-Stop Operator is responsible for ensuring that the integrated service delivery system at the Center supports all of the Board’s policies related to oversight and implementation of the one-stop delivery system. Additionally, the Operator is responsible for ensuring the service delivery system at the Center fully integrates the Board’s products, protocols and quality standards. The Operator performs these functions for the Center.

“The One-Stop Operator is to provide operational oversight to the Center. The Operator ensures services at every center are being delivered in accordance with the Board’s products and processes and will work with Board staff to develop a Continuous Quality Improvement process for center operations. The Operator is responsible for ensuring the integrated service delivery system at the Center supports all of the Board’s policies related to oversight and implementation of the one-stop delivery system.

“The One-Stop Operator will be responsible for implementing the new integrated customer flow process as covered in the Board’s two year plan. This will include working with the Board to establish criteria for identifying functional unit managers at the center. This process will also be used to staff the other workforce centers as well.

“The One-Stop Operator will provide leadership for the management of the other workforce centers. The Operator will be responsible for ensuring the other centers are following a continuous quality improvement process as outlined by the Board and the Operator. The Operator will be collecting performance information from each of the other centers to monitor the quantity of work being done. The Operator will work with Board staff on building a resource allocation model based on work being done at each center and the potential of work at each center. This will include establishing a Return on Investment model to help guide the Board in the placement of resources where they can be the most effective and efficient.

“The Contractor agrees all WIA Title I employment and training activities and services shall be conducted in accordance with the existing or hereafter amended Workforce Investment Act (WIA), the U.S. Department of Labor's regulations relating to WIA, and the State of Oklahoma WIA Policies, Central Oklahoma

Workforce Investment Board, Inc. Policies and Procedures, and the Contract Provisions.”

(3) Each comprehensive, integrated Center Manager must be authorized to organize staff by function, designate functional unit supervisors, and establish the purpose of each functional unit unless the LWIB has otherwise made these decisions.

It is the goal of the COWIB to better coordinate the delivery of employment and training services by the COWIB’s local WIA service provider staff and by other One-Stop Partners² which have assigned staff members to work in the comprehensive One-Stop Centers in the Central Oklahoma area. In connection with this goal, the COWIB recognizes that all partners in our local One-Stop system must have a proper understanding of the term, “functional supervision.” A special priority is to promote better coordination between WIA staff and the State of Oklahoma’s Wagner-Peyser funded program staff.

The following definition is offered:

“Functional Supervision” is defined by the COWIB as oversight of staff in all areas *other than* time and attendance and evaluations.

We believe that this definition is consistent with Section 652.216 of the Wagner-Peyser Regulations which outlines the conditions under which the One-Stop operator may provide guidance to State merit-staff employees.

Under this definition, One-Stop Partner direct line supervisors, after consultation with the functional supervisor, will complete Time and Attendance and Personnel Evaluations for One-Stop Partner employees who are assigned to work in the comprehensive One-Stop Centers in the Central Oklahoma area.

The following guidelines will be used by the Center Manager for the functional supervision of One-Stop Partner employees.

Functional Supervision of One-Stop Partner Employees by the Center Manager³

(a) General - Except as otherwise provided in this policy, the Center Manager may provide day-to-day functional supervision to One-Stop Partner employees

² As used in this policy, the term “One-Stop Partner” means an agency, organization, or entity described in Section 121(b) of the Workforce Investment Act. The term encompasses agencies and organizations which carry out any of the programs or activities listed in subparagraph 121(b)(1)(B). Reference: Workforce Investment Act, Section 101, “Definitions.”

³ These guidelines are modeled after “Workforce Development Policy Number 9, Addendum 1” of the Louisiana Department of Labor (LDOL). The Policy was issued by LDOL on June 1, 2006, and it covers the subject, “Definition of Functional Supervision in LDOL’s Integrated Work Processes.”

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who are assigned to a comprehensive One-Stop Career Center in the Central Oklahoma area, including the setting of work hours and program responsibilities (as limited below). In any event, each One-Stop Partner shall retain authority over all actions that may affect the current base pay, status, or tenure of its employees. The One-Stop Partner retains the sole discretion to determine which of its employees shall be assigned to occupy positions in the COWIB's One-Stop Centers. Unless otherwise specified by the One-Stop Partner, each assigned employee position will be treated as nonexempt under the Fair Labor Standards Act.

(b) Performance Evaluations – Each One-Stop Partner, in conjunction with the Center Manager, will complete performance evaluations of One-Stop Partner employees following the One-Stop Partner's personnel rules and regulations. To evaluate each employee's productivity, the One-Stop Partner will use criteria set by the One-Stop Partner and, upon advanced written approval by the One-Stop Partner, additional criteria set by the Center Manager. The employee's written performance evaluation form will reflect only the direct line supervisor's signature, but the evaluation process will be a cooperative effort with input from the One-Stop Center functional supervisor.

(c) Grievances – Each One-Stop Partner shall fulfill its duties and responsibilities by utilizing the One-Stop Partner's personnel system grievance process in response to any grievance filed by its own employee(s). The One-Stop Partner shall conduct appropriate investigations(s), conduct the initial grievance meeting, and furnish suitable information, as appropriate, to One-Stop functional supervisors and management. The One-Stop Partner shall retain the responsibility for all actions on grievances after the initial grievance meeting.

(d) Corrective Actions – Each One-Stop Partner, in conjunction with the Center Manager, will determine and implement any necessary corrective actions in accordance with the procedures in the One-Stop Partner's personnel system, provided that any grievances as a result of corrective action follow the procedures identified in paragraph (c) above.

(e) Disciplinary Actions – The One-Stop Partner shall retain the sole right to terminate, demote, and suspend its employees for disciplinary reasons. The Center Manager will cooperate and provide information deemed necessary by the One-Stop Partner in conjunction with proposed disciplinary actions.

(f) Posted Notices - The Center Manager shall post in conspicuous places all notices required by state and federal law for One-Stop Partner employees. Each One-Stop Partner shall supply necessary copies of such notices at the One-Stop Partner's expense.

(g) Cooperation - The COWIB and its One-Stop Operator shall cooperate fully with each One-Stop Partner in any investigations, appeals, grievances, or

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other personnel matters, including, and without limitation, those pertaining to allegations of unlawful discrimination.

(h) State Veterans Programs - All OESC state staff, including Veterans Services staff, working in Central Oklahoma's comprehensive One-Stop Centers shall be functionally supervised consistent with the manner outlined above. However, this does not alter the program responsibilities assigned to the OESC Disabled Veteran Outreach Program staff and the Local Veterans Employment Representatives by the U.S. Code, Title 38, Veterans' Benefits, Chapter 41, Job Counseling, Training, and Placement Service for Veterans and its Special Grant Provisions. The State Veterans Employment Representatives shall oversee the delivery of veterans programs and services under OESC rules and directives. State Veteran Services staff shall comply with the operational procedures of each comprehensive One-Stop Center, but veteran program requirements and staff responsibilities shall continue as stated in Title 38.

(i) Timesheet and Leave Approval - Final approval and sign-off of timesheets and leave requests for all One-Stop Partner employees shall remain with the One-Stop Partner. However, this shall be accomplished through a coordinated process between the One-Stop Partner direct line supervisors and the comprehensive One-Stop Center functional supervisors. The functional supervisor will initially sign timesheets and leave requests. The One-Stop Partner direct line supervisor will co-sign these documents.

(j) In-State and Out-of-State Travel – When a One-Stop Partner employee assigned to a comprehensive One-Stop Center is required to perform work outside of the Central Oklahoma workforce investment area⁴, advance travel approval documents will be signed by the Center Manager (or functional supervisor) and by the One-Stop Partner direct line supervisor. All One-Stop Partner employee travel expense reports will be signed by the functional supervisor and by the One-Stop Partner direct line supervisor.

(k) Workers' Compensation -- For each One-Stop Partner employee assigned to a comprehensive One-Stop Center, issues related to Workers' Compensation remain the responsibility of One-Stop Partner.

The general guidelines described above may be modified, with the approval of the COWIB's Chief Executive Officer, in order to fit particular circumstances and/or to comply with:

- Provisions of State or federal law;
- The local Memorandum of Understanding between the COWIB and each One-Stop Partner; and/or

⁴ For example, a One-Stop Partner employee may be assigned to attend an out-of-area training session or to perform other temporary work outside the Central Oklahoma workforce investment area.

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- Applicable collective bargaining agreements.

(4) Each comprehensive, integrated Center will utilize a single customer flow model based on customer need, not program requirements.

The COWIB will maintain an Operational Procedures Manual describing the delivery of services to job seeking customers. Each comprehensive Center will follow the customer flow model described in the COWIB procedures. The delivery of services will be based on the needs of customers.

(5) All customers will receive prompt service with no future scheduling of appointments for initial welcoming functions.

As described in the COWIB's Two-Year Plan, "The Central Oklahoma Workforce Investment Board will set new standards in serving customers that seek access to a truly integrated workforce development system."

As part of this commitment, the COWIB has stated that, "All customers will be greeted promptly upon arrival by a career guide."

Each comprehensive Center will follow the prompt service delivery guidelines described in the COWIB's Operational Procedures Manual.

(6) Oklahoma Service Link will be used to gather non-repetitive data in real time in each appropriate functional unit.

The COWIB's Operational Procedures Manual describes the manner in which data will be gathered within each functional unit. Each comprehensive Center will follow the data collection model described in the COWIB procedures.

(7) Every customer's computer comfort level must be ascertained with some plan to accommodate their lack of comfort via tutorials or pencil and paper assessments.

The COWIB's Operational Procedures Manual describes various ways in which an initial assessment of customer skills will be completed. In the event that a customer is unable to use a computer for the purpose of assessment, data collection, tutorials, etc., the One-Stop Center will offer an accommodation to the customer. Each comprehensive Center will follow the initial assessment guidelines described in the COWIB procedures.

(8) Every new customer will receive an initial skills assessment in the welcoming unit as a required staff assisted service.

The COWIB will maintain an Operational Procedures Manual describing various ways in which an initial assessment of customer skills will be completed. Each comprehensive Center will follow the initial assessment guidelines described in the COWIB procedures.

The State Policy on Initial Assessments is described in OETI #1-2007, Change 1, published on January 21, 2008. The Policy defines the meaning of the term “Initial Assessment.” Additionally, it defines the meaning of “Initial Skills Assessment.”

Excerpts from OETI #1-2007, Change 1:

“POLICY: Initial Assessment (Staff Assisted Service) – A process that provides preliminary information about an individual’s skill levels, aptitudes, interests and supportive service needs. The initial assessment will determine or verify employment / career goals and serve as an indicator for determining the next unit to which customers will be directed. An “initial assessment” will be the first staff-assisted service in which customers will be co-enrolled. An initial assessment must include an initial skills assessment.

“An Initial Skills Assessment is a process that provides a validated, measurable appraisal of an individual’s foundational skill levels. Foundational skills are the skills needed to some degree by essentially every job – skills such as reading and mathematics. The initial skills assessment results will determine if the individual has the necessary foundational skills needed for their employment/career goal. The initial skills assessment does not need to be repeated unless there has been a change in the individual’s career goals or skills. **KeyTrain pre-tests must be used as the initial skills assessment.**”

“In certain instances, the initial skills assessment is not required.

“Scenario 1 – A new customer that has already taken a skill assessment that measures foundational skills from a Workforce Center or another entity (e.g., Department of Rehabilitative Services) and these results are already documented or can be shared and then documented by the Welcome Unit staff and used to develop a Basic Employment Plan (BEP) need not retake the initial skills assessment unless there has been a change in the individual’s career goals or skills. *This does not preclude the customer from going through the other facets of the Welcoming Unit Initial Assessment process.*”

“Scenario 2 – A new customer who does not have adequate English-speaking skills is not required to take the initial skills assessment. Since KeyTrain pre-tests are not offered in Spanish or other languages at this point, non-English speaking customers should go through the Welcome Unit process but not be required to take the KeyTrain pre-test.

“This does not preclude the customer from going through the other facets of the Welcoming Unit Initial Assessment process and must be documented by staff in the basic employment plan.”

Consistent with the COWIB’s commitment to provide quality services to all customers -- and as permitted by OETI #1-2007, Change 1 -- the COWIB will explore the use of alternative instruments for the initial skills assessment function.

(9) Every new customer will receive career counseling which results in a Basic Employment Plan which is based on their interests, initial assessment, and labor market demand as a required staff assisted service.

The COWIB's Operational Procedures Manual describes how a Basic Employment Plan will be created for each customer who completes the initial job-seeker assessment and career planning function. Each comprehensive Center will follow the "BEP" described in the COWIB procedures.

“The culmination of the initial assessment and career planning function is the development of a basic employment plan. It is an informal plan providing preliminary information about a participant's employability based on an initial assessment of the customer's skills. The basic employment plan will indicate how the results of the initial assessment and career planning activities impact on his/her choice of services to be pursued. The basic employment plan should be simple and concise and will include a culmination of the initial assessment information and how that informs you of the individual's

- *wants,*
- *needs,*
- *career goal,*
- *barriers to employment to be addressed; and,*
- *the methods/services the individual will pursue to address them.*

“The Basic Employment Plan describes the path the individual will take through the workforce system.”

(10) Every Skills Unit customer must be offered remediation for any deficiencies identified in their initial assessment.

The COWIB is committed to the delivery of timely workforce development services that meet the particular needs of our individual customers. The COWIB's Operational Procedures Manual will reflect this ongoing commitment.

In order to address deficiencies identified in the initial assessment of a job-seeking customer's skills, the following process will be performed:

After a customer's enrollment has been validated and prior to beginning a Comprehensive Assessment--

- (a) The case manager will review the customer's initial assessment results;
- (b) For customers who have a "deficiency," (such as, they lack a marketable job skill or they have not completed high school, etc.), our case managers will offer an appropriate "remediation" that may include one or both of the following:

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- ◆ Intensive Service such as:
 - Group counseling
 - Case management for customers seeking training
 - Attendance at workshops
 - Short-term prevocational services; i.e., Literacy, Adult Basic Education

And/Or

- ◆ Training Services:
 - (i) occupational skills training, including training for nontraditional employment;
 - (ii) on-the-job training;
 - (iii) programs that combine workplace training with related instruction, which may include cooperative education programs;
 - (iv) training programs operated by the private sector;
 - (v) skill upgrading and retraining;
 - (vi) entrepreneurial training;
 - (vii) job readiness training;
 - (viii) adult education and literacy activities provided in combination with services described in any of clauses (i) through (vii); and
 - (ix) customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

(c) Training Services will be offered only if the customer is unable to obtain employment through Intensive Services. Referral to training will always be preceded by a comprehensive assessment and the development of an IEP.

(d) If no deficiencies are identified, then the customer will be offered a range of Core Services such as:

- (1) Job search and placement assistance, and where appropriate, career counseling;
- (2) Provision of employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including--
 - (i) Job vacancy listings in such labor market areas;
 - (ii) Information on job skills necessary to obtain the listed jobs; and

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- (iii) Information relating to local occupations in demand and the earnings and skill requirements for such occupations.

(11) The COWIB will monitor based on its local policies, including the standards and guidelines described herein.

POLICY ADDENDA: The COWIB Chief Executive Officer is authorized to issue additional instructions, guidance, forms, etc., to further implement the requirements of this policy.

Inquiries about this policy should be directed to the COWIB's Program Operations Manager at (405) 622-2030.

Oklahoma Employment Security Commission

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Oklahoma City, OK 73152-2003

Telephone (405) 557-0200

Oklahoma Employment and Training Issuance #03-2007, Change 1⁵

DATE: March 24, 2008

FROM: Richard J. Gilbertson, Director
Workforce Integrated Programs Division

TO: Chief Local Elected Officials
LWIB Chairs
LWIB Staff
Local Office Managers

SUBJECT: Local Workforce Integration Policy

PURPOSE: The development of local Workforce Integration Policy including the state minimums that must be included in the policy. Local Workforce Investment Boards (LWIBs) should use this guidance to make revisions as necessary to their local integration policy. Modifications in Change 1 were made to further explain that the minimum standards for delivery of demand driven, skills-based, integrated services occur at comprehensive integrated centers. Alterations made to this guidance are found on page four and include:

- Outlining the minimum standards
- Clarification that integrated service delivery happens at each comprehensive, integrated center for a Local Workforce Investment Board's area.

BACKGROUND: In July 2005 the Oklahoma Employment Security Commission (OESC) implemented a comprehensive reorganization of its state-level staff to move from a focus on the operation of silo programs to a focus on quality integrated service delivery. Wagner-Peyser (WP) and Workforce Investment Act (WIA) Title I Adult programs were no longer separate divisions, but were integrated into functional units.

The goals of this reorganization were to:

- Improve access to quality services through service and program integration

⁵ A copy of this issuance, with its original formatting, may be found on the website of the Oklahoma Employment Security Commission at ... http://www.oesc.state.ok.us/WIP/OETI/PDFs/OETI_03-2007_Change_1_Final.pdf.

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- Support the linkages between workforce programs and economic development by developing shared goals and emphases
- Implement the intent of the Governor’s Council and the State Strategic Plan for comprehensive workforce system integration
- Provide a framework to empower and support the Workforce Investment Board’s (LWIB) integration of Wagner-Peyser and WIA Title I Adult program operations at the local level
- Reduce duplication and seek efficiencies in a time of limited resources

This state-level reorganization was viewed as the first phase of a broader, more comprehensive integration of Wagner-Peyser and WIA Adult and Dislocated Worker programs. While integration with all workforce system partners remains a goal, it was important to give immediate attention to the integration of the two major program partners under OESC’s umbrella which, in most cases, continues to act as the backbone of Workforce Center operations.

In addition to this state-level reorganization, there were a number of other initiatives supporting Wagner-Peyser and WIA Adult Programs’ integrated service delivery:

- The Governor’s Council adopted a goal to “create an accessible system of integrated service delivery” in the State’s Two-Year Strategic Plan
- LWIB Certification required “quality workforce system integration” to be achieved
- Local Strategic Plans were required to evaluate the one-stop system and enhance service integration and develop an integrated service delivery strategy
- Local Two-Year Plans required LWIBs to show their priority with integrating the Wagner-Peyser Program and the Workforce Investment Act Title I Adult programs and meet established service integration benchmarks

In November and December of 2005, LWIB Directors, Workforce Center Managers, WIA Directors, Employment Service (ES) Area Managers, private sector LWIB members, and Chief Local Elected Officials (CLEO) were all invited to sessions designed to assist local integration efforts. Greg Newton, a nationally recognized consultant, assisted OESC in ensuring a common understanding of the definition and expectations of “service integration,” shared the benchmarks to be used to determine the degree to which local areas have achieved WIA/WP integration, provided an overview of what other States, LWIBs and Workforce Center Managers were doing, shared a customer flow model for consideration, and sought input into steps OESC should take to promote service integration at the local level.

Based on the input from these audiences, OESC made a number of changes, including:

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- Ensuring Oklahoma Service Link will assist the integration process by allowing service delivery to be as paper free as possible
- Permitting OESC local center staff to be functionally supervised by WIA staff under certain, appropriate conditions

Then in March 2006, OESC presented a one day session to LWIB members and staff, describing the State's shift to a skill-based service delivery system, defining service integration, offering ideas to bring about integration, and clarifying the LWIB's leadership roles and responsibilities in this initiative.

Oklahoma Employment and Training Issuance (OETI) 04-2006, State Common Measures Policy was issued May 30, 2006. This policy provided revised guidance for common measures based on the Training and Guidance Letter (TEGL) No. 17-05, "Common Measures Policy for the Employment and Administration's Performance Accountability System and Related Performance Issue" by the United States Department of Labor, Employment and Training Administration. OETI 04-2006 furnished guidance to minimize the different reporting and performance requirements, facilitated the integration of service delivery, and reduced barriers to cooperation between programs.

Responding to local input, in June 2006 OESC explained the rationale, motivation, and expectations with redesigning Oklahoma's workforce system to be demand driven, skills-based, and integrated. Several hundred front line staff from across the state attended these sessions and responded positively to the challenges.

In July 2006, OESC issued OETI 06-2006, Program Eligibility and Data Element Validation Policy for Workforce Investment Act Adult Dislocated Worker programs, Wagner-Peyser, and Trade Adjustment Assistance programs. This OETI provided eligibility and associated data element validation procedures that minimized the effect of program silos and the burden of validation documentation on staff and customers. It created a common customer pool for customers receiving staff assisted services. Equally important, this OETI directed that Oklahoma Service Link and local staff validation be used to comply with eligibility documentation and data validation. This allows most eligibility and validation documentation to be maintained electronically in OSL and replaces the need to keep paper records or original source documentation for performance participants receiving only core and intensive services.

Over the next several months, OESC continued to share with LWIBs, LWIB staff, Workforce Center Managers, and functional unit staff, techniques and processes to overcome the challenges of creating a demand driven, skills-based, integrated service delivery system. The training also discussed the purposes, outcomes, and process steps of each of the three functional units anticipated in the single customer flow model, generated ideas for developing local procedures and protocols, and captured peer learning for best practices.

MESSAGE: While there are now a number of fully integrated, skills-based Workforce Centers, many Centers remain challenged, finding it difficult to move forward with integration. In addition, some Centers are unclear about whether the Greg Newton sessions established State

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policy, whether LWIBs are responsible for local integration policy, whether their LWIB has established any local policy, or whether they are just lost. As a result, we have been asked to provide more clarity, if possible, about State expectations.

The Workforce Investment Act, in section 117, establishes that local boards are responsible for the one-stop delivery, or workforce, system in their local area. Integrated service delivery is merely one aspect of this local workforce system. So the responsibility for demand driven, skills-based, integrated service delivery clearly belongs to the LWIBs. However, in order to establish some consistency among workforce investment areas, the State has an interest in establishing minimum standards for this initiative. What follows are those minimum standards.

- 1) Each LWIB will designate at least one comprehensive center with integrated WIA Adult, WIA Dislocated worker, and Wagner-Peyser programs. Before making this designation the LWIB needs to consider virtual services opportunities; anticipated future ES and WIA funding levels; ensuring adequate WIA and ES staff in designated centers; and procuring not just WIA services, but integrated services where WIA staff may be functionally supervised by others.
 - i) Each LWIB will also designate a Center Manager for each comprehensive, integrated center.
 - (1) Each comprehensive, integrated Center Manager must be authorized to organize staff by function, designate functional unit supervisors, and establish the purpose of each functional unit unless the LWIB has otherwise made these decisions.
 - ii) Each comprehensive, integrated Center will utilize a single customer flow model based on customer need, not program requirements with the following services and actions occurring at the comprehensive, integrated Centers.
 - (1) All customers will receive prompt service with no future scheduling of appointments for initial welcoming functions.
 - (2) Oklahoma Service Link will be used to gather non-repetitive data in real time in each appropriate functional unit.
 - (3) Every customer's computer comfort level must be ascertained with some plan to accommodate their lack of comfort via tutorials or pencil and paper assessments.
 - (4) Every new customer will receive an initial skills assessment in the welcoming unit as a required staff assisted service.
 - (5) Every new customer will receive career counseling which results in a Basic Employment Plan which is based on their interests, initial assessment, and labor market demand as a required staff assisted service.

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- (6) Every Skills Unit customer must be offered remediation for any deficiencies identified in their initial assessment.
- 2) Every LWIB will monitor based on its local policies which must include these minimum standards.

Rescission: This issuance rescinds Oklahoma Employment and Training Issuance # 03-2007.

Inquiries: Questions may be addressed to Ann Pendergraft at 405-557-5317, ann.pendergraft@oesc.state.ok.us or Tami Decker at 405-962-7595, tdecker@oesc.state.ok.us.