



# CENTRAL OKLAHOMA WORKFORCE INNOVATION BOARD

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405-622-2026

June 9, 2017

Erin E. Risley-Baird, Executive Director  
Oklahoma Office of Workforce Development  
900 N. Portland  
Oklahoma City, OK 73107

Dear Ms. Risley-Baird,

Thank you for the opportunity to submit changes to our Local Plan for the Central Oklahoma workforce area.

The attached revision represents our best effort to meet the requirements of the WIOA law as well as to satisfy the concerns of the System Oversight Subcommittee (SOS) of the Governor's Council for Workforce and Economic Development.

The development of our Local Plan has been characterized by an open, public, and transparent process that, we believe, went far beyond the minimum standards described in the Regional and Local Planning Instructions issued by your office. In every way, the Public Review and Comment requirements of WIOA 108(d) were met and exceeded.

Prior to the presentation of our Local Plan to the Governor's Council on April 28th, we made sure that:

- (1) Copies of the proposed local plan were made available to the public through email messages circulated to hundreds of recipients, announcements on multiple websites, a published notice in the Journal-Record newspaper, recorded votes in open meetings of our local workforce development board and Board of Chief Elected Officials (BCEO), etc.
- (2) Members of the public -- including representatives of business, labor organizations, and education -- were given the opportunity to submit comments on the proposed plan.
- (3) Our Local Plan was submitted to the Governor's Council along with comments representing disagreement with the plan, as required in WIOA Section (d)(3).

As you can appreciate, the development of a public plan for workforce development is a challenging process. In creating our plan, we had three main objectives. We wanted our plan to comply with the requirements of the WIOA law. We wanted it to align with the State Plan. We also wanted our Local Plan to reflect, as much as possible, the diverse viewpoints of the communities we serve.

Richard Brown - Chair, Darci Williams - Vice Chair, Theresa Stewart - Vice Chair - Eddie Foreman, CEO  
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We don't expect that every constituent who is impacted by this plan will be in complete agreement with the plan in all of its aspects. It is impossible to gain complete agreement among business, labor, education, and one-stop partner organizations, etc. Even so, we think our Local Plan achieves the objectives described above. To the best of our knowledge, we think the plan meets the standards for approval by Governor Fallin.

We note that your letter of May 17th describes a concern expressed by some members of the SOS committee: *"...Concerns were expressed that partner involvement or inclusion was lacking, and employer in top industries in the area involvement or review was lacking."*

In that regard, we would like you to know that the development of our Local Plan occurred, at every step along the way, with the active involvement of our one-stop partner organizations. As early as November of last year, we established a special interactive website -- "COWIB 101" -- for the purpose of engaging our one-stop partners in the development of the Local Plan. Numerous meetings were held in which the Local Plan was discussed, and partner input was invited. Every meeting of our COWIB and BCEO governing boards was open to the public, and opportunity for public comment was consistently given.

We don't know why some committee members felt like partner involvement was lacking. Did they judge that the work of their agency representatives was ineffective in some way? Maybe they simply desired an extra opportunity to influence our Local Plan -- beyond the opportunity given to other constituent groups. We haven't tried to evaluate the motives or sentiments of the SOS committee. All we can say, for sure, is that we observed a process that was open, public, and transparent. Input from our one-stop partners was actively solicited and welcomed.

With respect to employer involvement, the business members of our local workforce development board were certainly involved in the development of our Local Plan. Moreover, business owners and managers from across our 9 counties were given the same opportunity as any other member of the public to make comments on the plan and to address any issues that were important to them.

For years, as you know, our COWIB Business Services Consultants have sought input from the business community with respect to their workforce development needs. We have championed industry sector partnerships. During the last year alone we have worked with two separate educational institutions to create industry specific training opportunities for the business community in our area. All of this reflects our commitment to understanding the needs of business and making sure that their priorities are reflected in our Local Plan.

One other comment should be made. That is, it appears to us that the SOS committee may have been overzealous in carrying out their review of our Local Plan. Some of their prescriptions for our Local Plan seem to exceed the requirements of the WIOA law.

For example, the Regional and Local Planning Instructions that you issued on March 9th did not include a style guide. However, in the SOS review of our Local Plan item B-1, the committee directed us to rewrite the item, omitting references to certain state and federal policies. Was this actually a requirement for the approval of our Local Plan? If so, we were not aware of it before we made our presentation to the Governor's Council. We wonder if the SOS committee established this standard after our plan was submitted. Perhaps it reflects an expectation of the committee that is beyond the standards prescribed in WIOA Section 108(e)?

Another example is the SOS review of our Local Plan item B-10. The committee asked us to provide a description of the local levels of performance for "all core partners" in our local workforce development system. However, we were not aware of any requirement like this in your planning instructions nor in the WIOA law. Did your planning instructions fail to describe this expectation? Or did the SOS committee add their own interpretation of the requirements of the law? It appears that there was some miscommunication, at the very least. Regardless, we are happy to note that a clarification was received in subsequent correspondence with your staff.

We raise these questions because we want to support a plan review process that is fair to everyone. We're sure you agree.

In summary, we want to assure you that we are committed to satisfying all of the requirements that are given in the WIOA law and in the Regional and Local Planning Instructions issued by your office.

If this Revised Local Plan fails to meet the Governor's standards for approval in any way, please let us know immediately. Feel free to contact our staff with any concerns you may have.

In particular, if the plan does not comply with any applicable provisions of the WIOA law, we would appreciate an additional opportunity to make improvements.

If the plan does not align with the State plan, we would also like to be informed so that corrections may be made.

We appreciate your support for workforce development in Central Oklahoma.

Respectfully,

Melissa Dennis  
Chief Local Elected Official

Richard Brown  
Chairman of COWIB

Attachments;

- COWIB Business Services Activity Report
- Fastest Growing Occupations with specific skills needed
- Central Oklahoma Workforce Development Briefing
- Voices of the Oklahoma Aerospace Industry Leaders
- GCWED Committee on Delivery Design
- Creating a Proactive System to Help Oklahoma Businesses Stay Strong and Grow
- Survey Results of Businesses by the Oklahoma Department of Commerce
- Oklahoma' Critical Occupation for Ecosystems
- Industry Overview by EMSI
- Building Top-tier Talent for the Greater Oklahoma City Region – Needs Assessment and Strategy Summary
- Tinker Field Hiring Forecast

cc:

COWIB Members  
Board of Chief Elected Officials - Central Oklahoma Workforce Development Area  
Steve Hendrickson  
GCWED System Oversight Subcommittee