

U.S. Department of Labor

Assistant Secretary for
Employment and Training
Washington, D.C. 20210



July 20, 2026

The Honorable J. Kevin Stitt
Governor of Oklahoma
2300 N. Lincoln Blvd., Suite 212
Oklahoma City, Oklahoma 73105

Dear Governor Stitt:

Thank you for your waiver request submission to the U.S. Department of Labor (Department) regarding certain statutory and regulatory provisions of the Workforce Innovation and Opportunity Act (WIOA) and the accompanying plan to improve the statewide workforce development system (enclosed). The waiver request was received on April 29, 2026, as part of your recent WIOA State Plan modification submission. This letter provides the Employment and Training Administration's (ETA) official response to your request and memorializes that Oklahoma will meet the outcomes and implement the measures identified in its plan to ensure accountability agreed to by Oklahoma and ETA. This action is taken under the Secretary of Labor's authority to waive certain requirements of WIOA Title I, Subtitles A, B, and E, and Sections 8–10 of the Wagner-Peyser Act in WIOA Section 189(i).

Requested Waiver: Waiver of the requirements at WIOA Section 134(3)(F)(i) and (G) and 20 CFR 680.320(a) and 680.340(a) to allow for all training services to be provided through training contracts.

ETA Response: ETA approves, through June 30, 2028, the State's request to allow contracts for services to be used instead of Individual Training Accounts (ITAs) to allow the State and its local areas to deliver training services through training contracts for services directly aligned to local employer needs. ETA reviewed the State's waiver request and the additional information that Oklahoma provided and has determined that the requirements requested to be waived impede the ability of the State to implement its plan to improve the workforce development system. ETA notes that the State may pursue the consortium training approach detailed in its request without a waiver. The request identified the State's intention for Employment Service staff to serve as case managers under its proposed training model; however, WIOA requires the local board to select service providers. Functions of local boards are outside of the Secretary's waiver authority.

Requested Waiver: Waiver of the requirements outlined in WIOA Section 107(b) to allow a state workforce development board to carry out the roles and responsibilities of a local board.

ETA Response: ETA appreciates Oklahoma's sustained engagement and ongoing work to strengthen its workforce system. The Department recognizes the State's commitment to improving service delivery across local areas. At this time, ETA does not approve the WIOA waiver request. Given the transformative nature of the proposal, a revised submission would benefit from a clearer and more detailed foundation. Specifically, the Department encourages the State to develop a comprehensive implementation plan with clearly defined and reasonable milestones, timelines, and roles, including risk management and mitigation strategies. This may include addressing the following areas:

- Establish a clear approach for obtaining, analyzing, and incorporating local feedback, and document how stakeholder input informs decision making on an ongoing basis.
- Develop and document standardized statewide policies that can be implemented in advance of any governance consolidation to promote consistency and effective service delivery.
- Enhance data driven continuous improvement practices, including performance targets, data quality controls, and feedback loops for course correction.
- Ensure access to quality services across all regions of the State, including rural and frontier communities.
- Assess fiscal impacts, operational readiness, and implications for state and required partner roles.

ETA will continue to provide hands-on technical assistance to ensure that the State is well positioned for future success. As the State makes progress in these areas, ETA is open to revisiting the State's request in the future.

Oklahoma also requested a waiver that does not advance the administration's key priorities. As articulated in Training Guidance Letter (TEGL) No. 05-25 and TEGL No. 08-18. Therefore, ETA does not approve the following waiver:

- Waiver of the performance accountability requirements at WIOA Section 116(b) and 20 CFR Part 677, and of the expenditure timelines and allocation requirements at WIOA Sections 128(c) and 133(c)(6) and 20 CFR 683.110–683.

Oklahoma also requested to waive that are outside the Secretary's waiver authority and therefore, ETA does not approve the following waivers.

- Waiver of the requirements at 20 CFR 678.305–678.320 and 20 CFR 678.500–678.760 to allow the redefinition of the American Job Center (AJC) service delivery structure and implement a statewide memorandum of understanding (MOU)/infrastructure funding agreement (IFA) model. Please note that while Work-flex authority at WIOA Section 190 does not allow the State to take control of local infrastructure funding, it does allow the State to provide waivers to local areas related to infrastructure funding. ETA is available for technical assistance if the State wishes to explore potential flexibilities associated with Work-flex.
- Waiver of the requirements at WIOA Section 106, 20 CFR 679.210 - 679.280 concerning the establishment and function of local workforce areas to create a single-area state.

Requested Waiver: Waiver of the requirements at WIOA Section 122(a)–(c) and 20 CFR 680.400–680.530 regarding eligible training provider (ETP) eligibility, reporting, and performance criteria and apprenticeship provider eligibility to permit automatic eligibility for apprenticeship programs other than Registered Apprenticeships.

ETA Response: ETA does not approve this waiver. WIOA permits Registered Apprenticeship programs that are registered with the Department of Labor or a State Apprenticeship Agency to be automatically eligible for the ETP list. In its request, Oklahoma refers to State-developed apprenticeships as Registered Apprenticeships. Apprenticeships developed by the State and registered with the Department of Labor can be automatically eligible for the ETP list without a waiver. Apprenticeships developed by the State and not registered with the Department of Labor are not Registered Apprenticeships and therefore not automatically eligible for the ETP list. However, the State can update its ETP policies, including policies for initial determination, to consider the varying credential and timing characteristics of apprenticeship-like programs.

ETA remains committed to working with Oklahoma on strategies that support expansion of apprenticeship and training opportunities. We welcome continued dialogue as the State explores options to strengthen and grow its apprenticeship system.

The State is reminded that WIOA Title I waivers may not be used for any discriminatory purposes. All activities and waiver plan provisions must comply with Section 188 of WIOA, the implementing regulations at 29 CFR Part 38, and all applicable federal nondiscrimination laws.

The State must report its waiver outcomes and implementation of the approved waivers in the WIOA Annual Report. ETA will use this information to assess continued waiver approval and to identify promising practices that may be adopted more widely. ETA is available to provide technical assistance to you in support of your goals. If you have questions, feel free to contact my office at (202) 693-2772.

Sincerely,

A handwritten signature in blue ink that reads "Henry Mack". The signature is written in a cursive, flowing style.

Henry Mack, Ed.D.
Assistant Secretary

Enclosures

cc: Trae Rahill, Chief Executive Officer, Oklahoma Employment Security Commission
M. Frank Stluka, Acting Regional Administrator, ETA
Monica Moguel, Federal Project Officer, ETA