October 19, 2026

The Honorable J. Kevin Stitt
Governor of Oklahoma

Marek Laco
Assistant Secretary
Employment and Training Administration
U.S. Department of Labor

Frank Stluka
Acting Regional Administrator, Region 4 – Dallas
Employment and Training Administration
U.S. Department of Labor

Brian D. Hart
Employment and Training Administration
U.S. Department of Labor
Region 4 – Dallas

RE: Formal Opposition to Oklahoma's Revised WIOA §107(b) Waiver Request

Dear Governor Stitt and U.S. Department of Labor Leadership:

We, the undersigned Chief Local Elected Officials (CLEOs) representing counties across Oklahoma, write to formally oppose the resubmission of Oklahoma's revised WIOA §107(b) waiver request, which seeks to transfer the statutory responsibilities of Local Workforce Development Boards to the Governor's Council for Workforce and Economic Development (GCWED).

In our April 2, 2026, letter to Governor Stitt, we expressed our opposition to the proposed restructuring of Oklahoma's workforce development system and raised concerns regarding the lack of meaningful consultation with local elected officials. Unfortunately, those concerns remain unresolved.

While we support efforts to improve efficiency and expand workforce training opportunities, the revised waiver raises significant concerns:

- **Unsubstantiated Financial Projections:** OESC projects $6.2 million in savings and an increase in training expenditures from approximately 40% to 80%. **No detailed financial analysis has been provided demonstrating how these savings will be achieved**. Essential administrative and service delivery functions will continue to require funding regardless of which entity performs them. We request an itemized financial analysis distinguishing actual cost savings from expenses merely transferred to the State.
- **Lack of an Operational Plan:** Despite repeated requests, OESC has not provided a proposed staffing plan, service delivery model, or corresponding operating budget. Without these documents, there is no reasonable basis to determine whether the proposed structure can achieve the projected savings while maintaining services throughout Oklahoma, particularly in rural communities.
- **Protection of Current Participants and Future Enrollments:** Our greatest concern is the potential disruption of services to individuals currently enrolled in WIOA Title I programs and those seeking assistance in the future. Many participants face significant barriers to employment and depend on these services for occupational training, supportive services, case management, and pathways to meaningful, self-sufficient employment. OESC has not historically served as the direct provider of WIOA Title I participant services, raising serious questions about its ability to assume responsibility without interruption. The waiver does not provide a detailed service delivery or transition plan demonstrating how existing participants will continue receiving services or how new enrollments will be processed during implementation. We request documented assurances that no participant will experience an interruption in training, supportive services, case management, or other essential services, and that future enrollments will continue without delay. These protections must be established and independently verified before any transfer of responsibilities occurs.
- **Governance Readiness and Accountability:** The GCWED has primarily functioned in an advisory capacity, yet the waiver proposes assigning it the extensive statutory and fiscal responsibilities currently performed by local workforce boards. The draft October 23, 2026, Council agenda allocates only 10 minutes to an overview of Council roles and responsibilities. No comprehensive training or demonstrated readiness to assume local board functions has been provided.
- **Loss of Local Decision-Making Authority:** Local workforce boards provide ongoing oversight of budgets, financial expenditures, performance outcomes, procurement, and American Job Center certification. The proposed Regional Workforce Advisory Councils would provide recommendations without the same statutory decision-making authority, diminishing local accountability and the role of elected officials and business leaders in workforce investments.
- **Lack of Independent Oversight:** The waiver proposes allowing the GCWED to determine its own readiness to assume local board responsibilities. We believe an independent assessment, with USDOL validation, is necessary before any transfer of authority.

We respectfully request that Oklahoma refrain from resubmitting this waiver until the financial projections, staffing plan, service delivery model, governance readiness requirements, and comprehensive participant service-continuity plan have been fully documented and made available for meaningful public review.

We further request that USDOL not approve the proposed transfer of local board responsibilities without independently evaluating these concerns and verifying that current participants and future applicants will experience no disruption in access to WIOA Title I services.

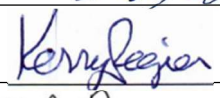
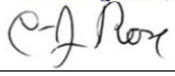
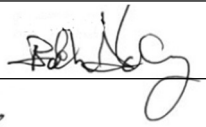
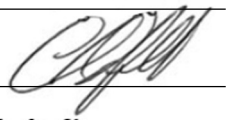
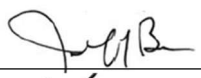
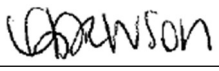
The individuals we serve cannot afford interruptions in the training and support they depend on to obtain meaningful, self-sufficient employment. Their needs must remain the priority in any proposed restructuring of Oklahoma's workforce development system.

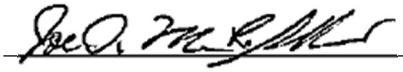
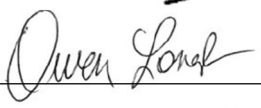
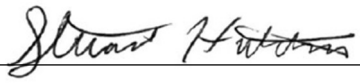
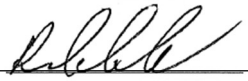
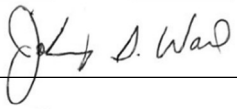
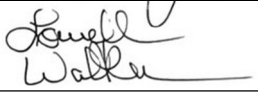
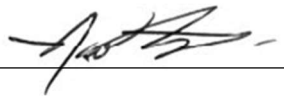
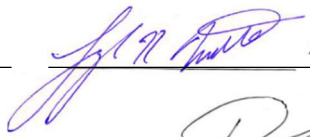
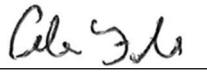
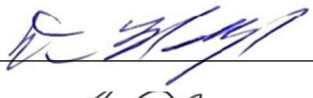
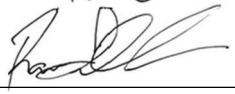
We remain committed to collaborating with the State and USDOL to strengthen Oklahoma's workforce system. However, we cannot support the proposed waiver in its current form.

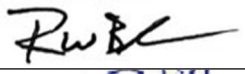
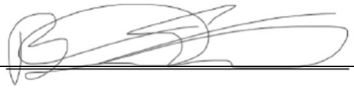
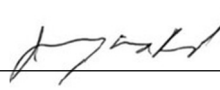
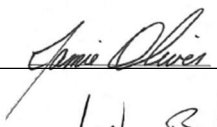
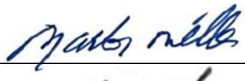
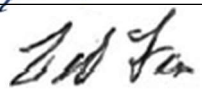
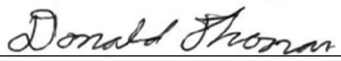
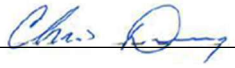
Respectfully,

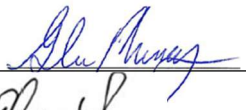
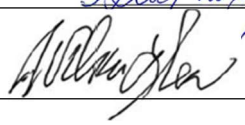
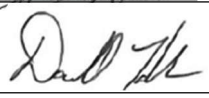
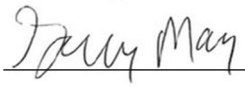
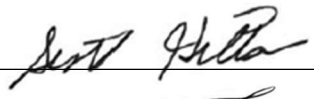
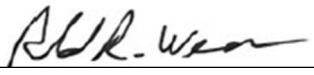
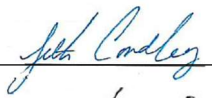
Undersigned Chief Local Elected Officials
State of Oklahoma

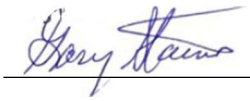
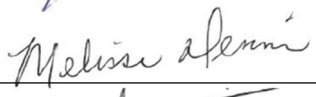
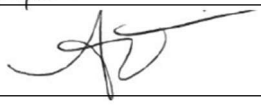
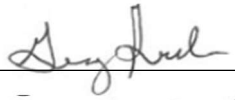
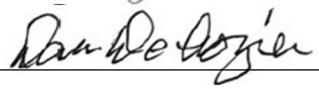
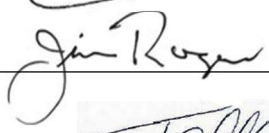
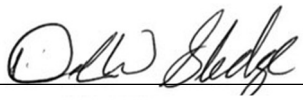
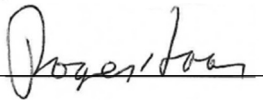
Signature pages attached

Name	Signature	County
Garret Johnson		Alfalfa
Kerry Regier		Beaver
CJ Rose		Beaver
Butch Goldsberry		Beckham
Sammy Carnes		Beckham
Carl Campbell		Beckham
Brandon Schultz		Blaine
Justin Boone		Bryan
Jeff Boren		Caddo
Mike Belter		Caddo
Lacey Dawson		Canadian

Joe McReynolds		Carter
Owen Longest		Carter
Chris Jenkins		Cherokee
Stuart Hutchison		Cimarron
Rod Cleveland		Cleveland
Johnny Ward		Coal
Lowell Walker		Craig
Hugh Gordon		Craig
Trenton Langley		Craig
Newt Stephens		Creek
Zac Moore		Creek
Lyle Miller		Custer
David Poindexter		Delaware
Cole File		Ellis
Tim Pile		Garvin
Dennis Halford		Greer
Greg Strawn		Harmon
Rance Tillman		Harmon
Gary Nielsen		Harper

Dwight Barnett		Hughes
Ty Phillips		Jefferson
Mike Niblett		Johnston
Roy Blevins		Johnston
Jason Shanks		Kay
Brent Straub		Kiowa
Rodger Kimble		Latimer
Jeremy Bullard		Latimer
Janie Oliver		LeFlore
Joshua Blaylock		LeFlore
Lee Doolen		Lincoln
Marlon Miller		Lincoln
Will Fine		Lincoln
Mark Sharpton		Logan
Stacy Rushing		Love
Donald Thomas		Major
Travis Darr		Major
Chris Duroy		Marshall
Joseph Graves		Mayes

Glen Murray		McClain
Wilson Lyles		McClain
Tina Thomas		McCurtain
Loyal Dean Taylor		McIntosh
Darrell Hudson		Murray
Kenny Payne		Muskogee
Gary May		Noble
Brandon England		Okmulgee
Steven Ward		Okmulgee
Chad Ray		Osage
Anthony Hudson		Osage
Scott Hilton		Ottawa
Mike Furnas		Ottawa
Curt Mullin		Pawnee
Ronald Weaver		Pawnee
Seth Condley		Payne
Zach Cavett		Payne
Ross Selman		Pittsburg
Mike Haynes		Pittsburg

Victor Balen		Pontotoc
Danny Davis		Pontotoc
Gary Starns		Pontotoc
Melissa Dennis		Pottawatomie
Abby Thompson		Pottawatomie
Greg Rush		Pottawatomie
Dan DeLozier		Rogers
Ron Burrows		Rogers
Gary Choate		Seminole
Jim Rogers		Sequoyah
Todd Churchman		Stephens
Dolan Sledge		Texas
Darrell Edwards		Texas
Roger Hoover		Tillman
Stan Sallee		Tulsa
Tim Kelley		Wagoner
Michael Antle		Washington
Bart Gossen		Washita