



## Special Called Meeting



**Thursday, May 21, 2026**  
1:30 pm- 3:00 pm



**Virtual Meeting**

Livestreamed by [Arkansas Citizens Access Network](#)





# AGENDA



## FULL BOARD- SPECIAL CALLED MEETING

May 21, 2026  
1:30pm

Call to Order .....Thomas Anderson Jr., Chairman  
Roll Call.....Board Staff

**Agenda Item 1: Approval of Minutes- Action**

Minutes of March 26, 2026 Special Called Board Meeting.....Thomas Anderson Jr., Chairman

**Agenda Item 2: Administrative Remarks- Informational**

Chairperson Remarks..... Thomas Anderson Jr., Chairman

State Board Director Remarks.....Dr. Charisse Childers, Executive Director  
*Arkansas Workforce Development Board*

State Workforce Agency Director Remarks.....Cody Waits, Executive Director  
*Arkansas Workforce Connections*

**Agenda Item 3: Workforce Pell Implementation Plan for Arkansas- Action**

State Workforce Board Consultation.....Dr. Tina Moore, Director of Workforce Development  
*Arkansas Department of Higher Education (ADHE)*

Location:  
Virtual Meeting  
Live Streamed- [Arkansas Citizens Access Network](#)



**Agenda Item 4: WIOA Combined State Plan PY’ 26-27 Modification Vote – Action**

WIOA State Plan Highlights..... Cody Waits, Executive Director  
*Arkansas Workforce Connections*

Public Comments Summary..... Eddie Thomas, Director  
State Response Overview & Waiver Request Justifications                      Angela Cook, Assistant Director  
*Arkansas Workforce Connections- Office of Employment and Training*

*Board Open Discussion*

Board Roll Call Vote ..... Thomas Anderson Jr., Chairman  
WIOA Combined State Plan PY’ 26-27 Modification  
(USDOL Waiver Requests #1-7 & Youth Renewal Waivers)

**Announcements**

**Adjournment**

**Resources:**

- [Workforce Innovation and Opportunity Act Adult, Dislocated Worker, and Youth Activities Program Allotments for Program Year 2026; Program Year Allotments for the Wagner-Peyser Act Employment Service Program; and Program Year 2026 Allotments of Workforce Information Grants to States and Outlying Areas](#)
- [America’s Talent Strategy: Building the Workforce for the Golden Age](#)
- [Maximizing Innovation in Workforce Innovation and Opportunity Act Programs](#)
- [Modification Requirements for Workforce Innovation and Opportunity Act \(WIOA\) State Plans for Program Years \(PYs\) 2026 and 2027](#)

**Policies/Issuances for Review**

[PY 25-05 Training and Supportive Services Program Cost Categories](#)



**Agenda Item 1: ACTION**  
**MINUTES from March 26, 2026 Meeting**



# **Arkansas Workforce Development Board**

## **Minutes**

**March 26, 2026**

Arkansas Department of Commerce

The Arkansas Workforce Development Board convened in person at the Department of Commerce in Little Rock, Arkansas, beginning at 11:13 am. Chairman Thomas Anderson Jr. presided with the following members voicing their presence: Mr. Mike Rogers, proxy for Governor Sarah Sanders, Commissioner Joseph Baxter, Mr. Len Blaylock, Ms. Karen Breashears, Mr. Aaron Chastain, Dr. Teri Cox-Meadows, Mr. Miles Crawford, Judge Brandon Ellison, Mr. William French, Mr. Randy Henderson, Ms. Rebecca Ives, Ms. Candice Lawrence, Dr. Trenia Miles, Ms. Latanyua Robinson, Mr. Barry Sellers, Mr. Kelley Sharp, Mr. Timothy Thorne, Mr. Cody Waits, and Dr. Ken Warden.

Mayor Ray Bowman, Mr. Brian Marsh, Mr. George Nunnally, and Mr. Clint O’Neal were unable to attend. The board staff confirmed that a quorum was present.

**Agenda Item 1: ACTION-Approval of Minutes:** Chairman Anderson asked whether any corrections/revisions needed to be made to the January 7, 2026, minutes.

**Hearing none, a motion was made by Mr. Kelley Sharp and seconded by Ms. Candice Lawrence. The motion carried unanimously, with none opposed.**

**Agenda Item 2: INFORMATIONAL-Administrative Reports:**

**Report of Chairperson:** Chairman Thomas Anderson Jr. stated that today’s special-called meeting will have a primary focus on the 2026-2027 WIOA State Plan modifications, an important step in ensuring Arkansas remains aligned with federal expectations, responsive to employer needs, and positioned for long-term economic competitiveness. Chairman Anderson noted that the Arkansas Workforce Development Board has played a central role in getting us to this point. Their guidance, questions, and willingness to challenge assumptions have strengthened our system and helped shape a plan that reflects the board’s values and vision.

The following summary of state plan development events was presented for the record:

In December 2024, the Strategic Planning Committee reconvened to regularly review strategic goals and reestablish regular check-in points to monitor the progress towards goals in the four-year plan. This project was led by Chairwoman Karen Breashears and Dr. Charisse Childers. In February 2025, the Strategic Planning Committee invited the National Governors Association to Arkansas to assist the board with strategic planning activities, and this work continued throughout the year. Chairman Gan Nunnally led the Program and Performance Evaluation Committee through a similar project focused on WIOA performance and overall service

effectiveness. The full board held regular quarterly board meetings throughout 2025. In November 2025, the board approved a preliminary timeline to submit the two-year plan modification and initiated activities to jointly develop and update the current state plan along with the state workforce agency and partners.

In January 2026, Subcommittees of the board met on the campus of SEARK College to align priorities of the WIOA plan with the five pillars of the America's Talent Strategy guidance developed by President Trump, along with the Department of Labor, Education, and Commerce. The board expressed a consensus to explore flexibilities through waivers being encouraged by USDOL, the Arkansas General Assembly, and other key stakeholders. At the January meeting, state program directors provided the board with progress updates on the plan, and the board approved a revised timeline for submission while awaiting federal guidance from USDOL. Towards the end of January 2026, DOL issued TEGL 07-25, which provided states with guidance and requirements for the state plan submission. The TEGL encouraged states to include Perkins V and CTE programs in a combined plan.

To allow time to integrate the Perkins V plan, explore waiver flexibilities, and incorporate the five pillars into the WIOA combined state plan, Arkansas requested an extension to submit the plan by May 29, 2026. The USDOL Region 4 ETA office granted an extension up until April 30, 2026, and the extra time to submit is still pending. In the meantime, state staff solicited feedback and engagement from board members and external parties, including the Governor's workforce cabinet, to finalize the first draft of the plan.

#### **Tentative Submission Timeline:**

- **March 26, 2026:** State Board Final review, feedback, and vote.
- **April 1-30, 2026:** Public Comment Period and additional Stakeholder engagement activities.
- **May 1-8, 2026:** Partners finalize responses to public comments.
- **Week of May 11-15, 2026:** AWDB special called meeting to review public comments and state responses. Final vote on state plan modification.
- **May 18-20, 2026:** state program directors key all narrative and public comments into the WIOA state plan portal.
- **May 22, 2026:** Big submitter certifies the state plan in the portal

Report of AWDB Director: Dr. Charisse Childers yielded her time to Secretary McDonald. Secretary McDonald thanked everyone for their attendance and participation, Secretary McDonald stated that the board will be making bold and historic decisions at the meeting that will move forward the Governor's Workforce Strategy. Mr. McDonald concluded by stating the federal government is pleading for states to send waivers to make processes more efficient and ultimately provide people with more employment, skills, and training.

### **Agenda Item 3-INFORMATIONAL-WIOA State Plan PY '26-27 Modifications**

Arkansas Workforce Connections Executive Director, Cody Waits thanked everyone for their attendance and participation. He also thanked Senator English and Representative Bentley for their work with the Workforce and Social Services Study conducted by the Alliance for Opportunity. Executive Director Waits provided an overview of the 2026 State Plan. The 2026 state plan outlines a transformative vision for a more unified, efficient, and demand-driven workforce development system that reduces administrative complexity, maximizes public investment and direct services, and strengthens alignment with employers and career seekers. The state plan is grounded in the principles of the governor's workforce strategy, America's talent strategy: "Building the Workforce for the Golden Age, and its five pillars, and new flexibilities provided through USDOL TEGL 07-25. This plan advances a bold restructuring of governance, service delivery, educational alignment, and business engagement to ensure a more responsive and integrated workforce system.

Executive Director Waits concluded by stating that Arkansas is not simply updating its plan; it is transforming its workforce system to meet the demands of a rapidly changing economy and ensure every Arkansan has the opportunity to thrive.

#### **Combined Plan Highlights:**

- Title II: Adult Education: Dr. Trenia Miles provided updates on the Adult Education program.
  - Adult education is focused on how their programs support in-demand industries and career pathways.
  - Adult Education has included more detailed information on pre-apprenticeships and other training programs.
  - TANF has been removed as a provider, and SNAP ENT services have been expanded.
  - LACES identifies key intake data fields to manage the combined state agency's common intake process by utilizing Civiform.
  - LAUNCH has been incorporated into the WAGE program. This will be a requirement for adult learners who are entering the program and want to improve their basic academic skills.
  - Currently, providing services to help individuals prepare for transitioning out of correctional institutions and workforce preparation while incarcerated.
  - Lastly, Adult Education has begun the referral process with manufacturing academies across the state to leverage current funds and source opportunities for incoming students to the GED programs or for students who have successfully completed the GED program to give students a different opportunity or pathway from the traditional route.

Title IV: Arkansas Rehabilitation Services (ARS): Commissioner Joseph Baxter provided updates on the Arkansas Rehabilitation Services program.

- ARS staff have made updates to the State plan. Updates have been provided to the common elements section under core program activities to implement state strategy and in the ARS program-specific section under goals, priorities, and strategies.
- ARS addressed the anticipated passing of legislation in 2027 to combine Arkansas Rehabilitation Services and the Division of Services for the Blind into one vocational rehabilitation agency.
- Under the State Rehabilitation Council section, ARS emphasized that SRC membership is not in compliance and will only have four members after February 1st, 2026. Federal regulations under the Governor's Executive Order requirement with 15 members. For this update, ARS completed a new three-year comprehensive statewide needs assessment in 2025 and updated the CSNA section of the State plan.
- Lastly, under the evaluation of reports progress section of the State plan, extensive changes were made to update the progress on goals, strategies, and priorities set in program year 24. Updates have also been made to the current personnel numbers and five-year projections of personnel needed. With the implementation of the new pay plan, ARS expects to more easily recruit for unfilled positions and to reduce employee turnover.

Title IV: Division of Services for the Blind (DSB): Executive Director, Cody Waits, provided updates on the Division of Services for the Blind program.

- Division of Services for the Blind (DSB) currently has a furlough affecting 56 employees due to a lapse in federal funding.
- There is an ongoing plan (possibly by 2027) to merge Arkansas Rehab Services (ARS) and DSB, which has been discussed for years. A merger would require a new statewide comprehensive needs assessment and compliance with federal requirements.
- DSB and ARS will be realigned under a broader workforce system to improve efficiency and effectiveness.
- Current structure is inefficient, with overlapping regional systems and duplicated management roles.
- A recent reduction in force (RIF) aims to lower high administrative costs and correct staffing imbalances.
- Over the next two years, DSB's structure will be redesigned alongside broader agency consolidation discussions.
- Federal oversight (RSA) already evaluates ARS and DSB performance together, reinforcing the push toward integration.
- Funding is heavily skewed (majority to ARS, smaller portion to DSB), but the merger should expand opportunities for DSB clients.

- Two separate case management systems are currently in use; plans are underway to unify them into one system to cut costs and reduce duplication.
- Lastly, additional planning and federal compliance work are ongoing, with the anticipation of DSB staff returning to work next week after the completion of upcoming internal meetings.

Supplemental Nutrition Assistance Program (SNAP E&T): Mr. Christopher Holder provided updates on the SNAP E&T program.

- The SNAP E&T program is moving away from a voluntary program. They are implementing Act 974 to become a full mandatory program effective April 1st. They are anticipating going live on April 3rd. Their computer software will roll out this coming weekend.
- Currently, they are under enhanced review by FNS due to transitioning to a mandatory program, with biweekly meetings to ensure that the mandatory program is going to be implemented correctly and the new client population will receive the benefits they're supposed to.
- They currently have four providers for the State of Arkansas, and we will start looking for a couple of additional providers after April. Feedback is welcome for any potential providers that are willing to be a SNAP E&T provider.

Unemployment Insurance (Reemployment) Program: Director Kristen Rhodes provided updates on the Reemployment program.

- The Reemployment program has a federal mandate to double down on the integrity of our program, which we included in our updates to the State plan. We also want to continue to partner with our WIOA partners to ensure that individuals who are recently separated from employment are connected to a WIOA partner for supportive services and quickly return to the workforce.
- Working collaboratively with our WIOA partners to make sure they have wage information, so they have success statistics to show people are entering the workforce.
- Partnering with the data team at OST. By January of 2027, we have made the agreement to include the date of birth on wage records to be able to better match with education records to help with success statistics.
- Working towards being able to include SOC codes for individual types of employment on the wage records to be able to have that true longitudinal data on wage records for success.

Career & Technical Education (CTE & Perkins V): Director Ross White provided updates on the CTE program and Perkins V.

- As of July 1, 2025, the State of Arkansas entered into a new Perkins V plan. This plan reflected the Learns Act that was passed by the governor, and pieces of the Access Act that were just becoming legislation, and then the opportunity to have alignment across the state with the governor's workforce piece.
- Perkins V is viewed as a piece of building talent; WIOA connects that talent to jobs. Perkins 5 focuses on career and technical education and developing programs in our schools and colleges that prepare individuals with the skills and credentials employers need, and WIOA focuses on helping individuals access training, overcome barriers, and transition into employment.
- While they have different roles, they are designed to work together, and our plan is intentionally to align them. Both Perkins V and WIOA share the same core priorities of in-demand career pathways, strong employer engagement, and measurable outcomes like credentialing, employment, and earnings.
- They are not just aligned in strategy but also aligned in outcomes. The strongest connection between the two is the career pathways. Perkins V supports the design and delivery of success-ready pathways and high-demand, high-wage fields for our education systems. WIOA helps individuals enter and complete those pathways by funding training, providing support services, and assisting with job placement.
- Perkins V delivers the pathways, and WIOA helps people succeed in those pathways.
- We're often serving the same individuals but at different stages of life. By coordinating our efforts, we create smoother transitions from education into the workforce and reduce the duplication of services. While the funding streams remain separate, we intentionally braid them together to support a unified strategy.
- This combined plan allows us to not operate as separate programs, but as one coordinated system, moving individuals from education to employment, while meeting the needs of our state and aligning with the governor's workforce strategy and the American Talent Strategy.

Trade Adjustment Assistance program (TAA) & Jobs for State Grant (JVSG) program: Director Eddie Thomas provided updates on the TAA and JVSG programs.

- TAA is currently under sunset status. We do not know how long this program will exist, but it is still part of our plan.
- For the JVSG program, the Disabled Veterans Opportunity Program (DVOP), Employment Specialists, and the local Veteran Employment Representatives (LVERs) positions have been consolidated into one position. 12 staff members within our local offices now perform both functions, and they are equipped to do both employer engagement, outreach, and case management with veterans.

- Currently, working on a pilot program with the VA and TransfrVR, which is a software company for virtual reality headsets that we have within our centers. We're working with employers, job seekers, and transitioning service members to not only expose them to different career paths, but also to provide training opportunities through the VR headsets. To ensure this was a good investment, we reached out to employers, and are continually reaching out to employers, asking them to tell us what in-demand occupations are, what skills are most important, and what training programs will be most relevant in that space.
- We have three companies that have agreed to partner with us on this pilot.

**Agenda Item 4-ACTION-Waiver Requests:**

Director Eddie Thomas, Assistant Director Angela Cook and Assistant Director Marcia Moore from the Office of Employment and Training provided an overview of proposed waivers.

- Waiver 1: State Board Acts as Local Board: This waiver would allow the Governor to designate the Arkansas Workforce Development Board to carry out the roles and responsibilities of the local boards for the purpose of operating as a single statewide planning area in accordance with 20 CFR 679.310(f).
- Waiver 2: Flexibility to Reallocate Funds Across Local Workforce Areas: This waiver would provide flexibility to Arkansas in redistributing funds among workforce areas.
- Waiver 3: Network of Affiliate Sites in lieu of Comprehensive Centers: This waiver would allow Arkansas to leverage virtual and remote services as well as utilize a robust network of affiliated sites that leverage strategic co-location with partners to minimize infrastructure costs while maximizing reach.
- Waiver 4: WIOA Training Dollars & Supportive Services-Funding Flexibility: Arkansas is seeking a waiver of the requirement to determine inability to obtain other grant assistance prior to funding and training and supportive services for adult, dislocated workers, and youth. Arkansas also seeks the allowance of self-attestation for lack of other available funding options.
- Waiver 5: State Plan Acts as Regional Plan: The State of Arkansas is seeking a waiver of the requirement outlined in 20 CFR 679.510 through 20 CFR 679.540 to allow the state plan to act as the regional plan in accordance with the overall vision of operating as a single area state.
- Waiver 6: State Board Flexibility: The State of Arkansas is seeking a waiver that specifies board membership and category/subcategory representation requirements. This would allow the state to change the structure and operation of the state board to streamline overall state board membership and better address the employment and skills needs of the state.

- Waiver 7: Youth Program Elements Flexibility: This waiver would enable increased flexibility in providing the services most needed. This will allow Arkansas to focus on work-based learning and occupational skills training opportunities in demand statewide while remaining agile and responsive to emerging needs.
- Renewal of current Youth waivers included in the PY '24-27 WIOA combined state plan.

Chairman Anderson allowed comments from the public. Before hearing the public comments, Chairman Anderson entertained a motion from the board to approve the submission of the waivers.

**A motion was made by Dr. Ken Warden and seconded by Mr. Len Blaylock. The motion carried unanimously, with one opposed.**

Members of the general public, including staff of local workforce development boards, were given an opportunity to address the board. Concerns were raised regarding the proposed waivers. Members of the board along with state agency staff provided responses to the public and encouraged all interested parties to utilize the official public comment process to document their support or opposition. It was mentioned that members of the Arkansas Workforce Connections team would be working with local workforce board staff to schedule meetings with local workforce board members and chief elected officials, with the intention of sharing information including in the plan and answering any questions, while consulting with stakeholders to gather feedback on any potential changes to the proposed plan.

**Agenda Item 5-ACTION-WIOA Combined State Plan PY 2026-2027 Modification:**

Chairman Anderson entertained a motion to approve the 2026-2027 WIOA combined state plan modification draft and begin the public comment process.

**A motion was made by Mr. Miles Crawford and seconded by Mr. Len Blaylock. The motion carried unanimously, with one opposed.**

**Agenda Item 6-ACTION- WIOA Regional & Local Plan PY 2026-2027 Modifications:**

Ms. Stephanie Blair, WIOA Policy Manager, presented information on the regional and local plan guidance for the upcoming planning cycle. Ms. Blair explained that the guidance aligned with components of the state plan and was a required activity for local workforce development areas.

Chairman Anderson entertained a motion to approve the PY 2026-2027 WIOA Regional and Local Plan Modifications issuance and accompanying submission templates.

**A motion was made by Mr. William French and seconded by Judge Brandon Ellison. The motion carried unanimously, with none opposed.**

**Agenda Item 7- ACTION-USDOE Connecting Talent to Opportunity Challenge (CTO):**

Dr. Tina Moore of the Arkansas Department of Higher Education and Dr. Erin McCarley of the Shared Administrative Services and the Office of State Technology- AR Data team presented

information about the CTO challenge. The CTO Challenge is a national call to action for states to build stronger, more connected education-to-workforce systems through interoperable Talent Marketplaces. These marketplaces integrate credential registries and Learning and Employment Records (LERs) and leverage artificial intelligence to connect job seekers, employers, and education and training providers through skills-based job descriptions. Dr. Moore and Dr. McCarley explained Arkansas' proposal and asked for feedback from the state board and an official vote of support.

Chairman Anderson entertained a motion to support the grant application and the initiative if Arkansas is selected for an award.

**A motion was made by Mr. Len Blaylock and seconded by Mr. Randy Henderson. The motion carried unanimously with none opposed.**

**Agenda Item 8-ACTION-USDOJ Reentry Employment in Skilled Trades, Advanced Manufacturing, Registered Apprenticeships and Training (RESTART) Grant:**

Director Eddie Thomas of the Office of Employment and Training introduced the RESTART grant and shared that the agency was interested in applying for funding in conjunction with multiple partners. The U.S. Department of Labor announced the availability of approximately \$81 million in [grant funding to assist people reentering their communities after being incarcerated](#) by helping them gain experience and secure employment in skilled trades and high-demand industries. Reentry Employment in Skilled Trades, Advanced Manufacturing, Registered Apprenticeships, and Training initiative grants will enable organizations to provide training programs to formerly incarcerated individuals in skilled trades and high-demand industries.

Mr. Thomas explained that the grant aligned well with Governor Sanders Reducing Recidivism re-entry pilot and asked Mr. Michael Tippin to share more information and updates about the program.

Chairman Anderson entertained a motion to support the grant application and the initiative if Arkansas is selected for an award

**A motion was made by Mr. Randy Henderson and seconded by Ms. Karen Breashears. The motion carried unanimously with none opposed.**

Public Opportunity to Address the Board: None

Announcements: None

Adjournment: Chairman Anderson entertained a motion to adjourn the meeting.





## Agenda Item 2: Informational Administrative Remarks





# Agenda Item 3: Action

## Workforce Pell Implementation Plan



## **Arkansas Workforce Pell Implementation Plan**

*Presentation to the Arkansas Workforce Development Board by the Arkansas Division of Higher Education on behalf of the Governor's Office, May 21, 2026.*

The draft Workforce Pell (WFP) Implementation Plan supports Arkansas' rollout of the federal WFP regulations. [H.R. 1 - One Big Beautiful Bill Act of 2025](#) (page 280) established WFP, expanding Pell Grant eligibility to high-quality, short-term workforce programs aligned with labor market demand. Significant program eligibility guardrails were established in the legislation and further clarified through the Notice of Proposed Rulemaking (NPRM): [Accountability in Higher Education and Access through Demand-Driven Workforce Pell: Pell Grant Exclusion Relating to Other Grant Aid; and Workforce Pell Grants](#). The [Proposed Rules](#) were released for public comment on March 9<sup>th</sup> and closed on April 8<sup>th</sup>. Although final rule promulgation is pending, states must move forward with developing implementation plans due to the July 1, 2026, program launch date. The legislation and rules require the Governor to consult with the State Board, defined as the State workforce development board established under Section 101 of WIOA and 20 CFR 679 Subpart A.

The intent of the 5/21/26 presentation to the State Board by the Arkansas Division of Higher Education (ADHE), on behalf of the Governor's Office, is to approve the proposed Workforce Pell Implementation Plan. If approved, ADHE, on behalf of the Governor's Office, will return before the State Board to submit a list of workforce training programs meeting state and federal requirements for Board review/approval, anticipated July 2026.

## **Executive Summary**

### **State of Arkansas Workforce Pell Implementation Plan**

The State of Arkansas has established a comprehensive, data-driven, and employer-validated framework to implement Workforce Pell in alignment with federal requirements under 34 CFR §§690.93–690.95. This plan ensures that all approved programs deliver high-quality, workforce-aligned training that leads to strong employment outcomes and economic mobility for students.

### **State Leadership and Governance**

The Governor, in consultation with the Arkansas State Workforce Development Board, serves as the approving authority for all eligible workforce programs. The Arkansas Division of Higher Education (ADHE) and the Arkansas Department of Commerce (ACOM) collaboratively support program review, data validation, and ongoing accountability, with employment and wage outcome verification through ARData at the Arkansas Department of Shared Administrative Services.

### **Workforce-Aligned Program Approval**

Arkansas uses its established 5-Star Occupational Demand methodology—which evaluates demand, growth, retention, and earnings—to ensure programs align with high-skill, high-wage, or in-demand occupations. Programs must demonstrate alignment through CIP-to-SOC mapping and meet clearly defined thresholds for workforce relevance.

### **Employer-Driven Validation**

Programs must provide direct evidence of employer demand, including:

- Employer commitments to hire, interview, or prioritize completers
- Demonstrated job placement outcomes, or
- Ongoing employer engagement in program design and delivery

This ensures that all approved programs are responsive to real labor market needs.

### **Credential Quality and Career Pathways**

All programs must lead to a recognized, stackable, and portable credential, including industry certifications, licensure, or Registered Apprenticeships. Programs must also demonstrate clear

pathways to additional credentials or degrees, supported by articulation agreements or prior learning credit policies.

## **Data-Driven Accountability**

Arkansas leverages its statewide longitudinal data system (ARData) and the Arkansas Higher Education Information System (AHEIS) to validate outcomes. Programs must meet federal performance thresholds, including:

- ≥70% completion rate, and
- ≥70% job placement rate, verified through UI wage records

Annual data matching ensures ongoing program eligibility and continuous improvement.

## **Transparent Processes**

The State has established a standardized, publicly available process for program approval, including:

- Clearly defined criteria and submission requirements
- A structured review timeline with interagency coordination
- A formal appeals process with independent review and consistent timelines

These processes ensure fair and transparent treatment across all eligible institutions.

## **Value and Student Protection**

Arkansas incorporates the value-added earnings (VAE) analysis, comparing program cost to completer wages, to ensure programs provide a positive return on investment for students and taxpayers.

## **Commitment to Continuous Improvement**

Approved programs are subject to annual review and re-certification, tied to institutional Program Participation Agreements. The State will maintain ongoing alignment with workforce needs through regular updates to labor market data and employer engagement strategies.

Arkansas's Workforce Pell implementation ensures that public investment supports programs that are aligned to employer demand, validated by outcomes, and designed to advance student success and workforce competitiveness.

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# State of Arkansas Workforce Pell Implementation Plan

## I. Governance and Authority

The Governor, in consultation with the State Workforce Development Board (AWDB), will determine program eligibility in accordance with federal requirements. The Arkansas Division of Higher Education (ADHE) and the Arkansas Department of Commerce (ACOM) collaboratively support program review, data validation, and ongoing accountability, with employment and wage outcome verification through ARData at the Arkansas Department of Shared Administrative Services.

Evidence, Process, and/or Policy

- Governor-issued certification for each program
  - Documentation of AWDB consultation via:
    - Official memorandum on Governor's letterhead
    - AWDB meeting minutes
- 

## II. Program Eligibility Determination (34 CFR 690.93(a))

### A. Alignment to High-Skill, High-Wage, or In-Demand Occupations

Programs must align to state-identified workforce demand.

Evidence, Process, and/or Policy

- Arkansas's 5-Star methodology (Demand, Growth, Retention, Earnings)
- Programs must map CIP codes to SOC codes rated:
  - 3+ stars, OR
  - 2 stars with demand score >60
- State-level data or for the region(s) served by the institution
- Methodology published annually by DWS
- Registered Apprenticeship RTI programs automatically qualify for this requirement
- Alternative LMI source considerations: While the Arkansas Demand Occupation List is based on a comprehensive analysis of labor market information, conditions may change during the year due to factors such as emerging industries, new businesses locating to an area, or the impact of technology on the workforce. Therefore, institutions can request that training programs aligned with occupations not meeting the set job demand ratings and thresholds be considered for Workforce Pell, if they demonstrate that there is a significant workforce need in their labor market area. Examples of documented need include:

- A collection of letters (minimum of two) from employers stating their current intention to hire and a recurring need for individuals trained in the program.
  - Proof that the training program experiences repeated high placement and wages.
  - Results from labor market surveys that utilize reliable procedures (i.e., survey of local employers to see how many workers they anticipate needing within the next year).
  - Proof from Chambers of Commerce, the Arkansas Economic Development Commission and/or local industrial development organizations of the verified need for additional trained workers in the training program.
  - Information that relates to staffing patterns. Examples include plant openings or expansions or emerging occupations related to technical changes.
  - ADHE/ACOM will review the request and determine if the submitted documentation merits approving the occupation and training program. Programs must still meet the 12-month requirement per federal regulations.
- 

## **B. Employer Hiring Requirements**

Programs must demonstrate alignment with employer hiring needs.

Evidence, Process, and/or Policy

Institutions must provide validated employer demand evidence through one of the following for at least two employers:

- Employer letters of support that:
    - State demand for the specific skills/credentials
    - Indicate intent to hire, interview, or prioritize completers
    - Reference local/regional workforce needs, not just general support
  - Record of successful job placement and retention for program completers
  - Evidence of employer engagement in program through curriculum development, advisory councils, WBL opportunities for students, and/or asset contribution (financial donation, equipment/materials, staff serving as instructors).
  - Formal endorsement or recognition by employer-facing industry association that represents two or more employers
  - Survey responses provided by industry partners
  - MOU's or contracts showing evidence of recurring employer sponsored cohorts of training in program
  - Registered Apprenticeship RTI providers must provide Employer Acceptance Agreement
-

## C. Credential Requirements

Programs must (1) result in a recognized, stackable, and portable credential, or (2) prepare students for employment in an occupation for which there is only one recognized postsecondary credential and provides students with the credential upon completion of the program.

Evidence, Process, and/or Policy

For (1):

- Documented stackable pathway(s) within the IHE or with other IHE

AND

Select one of the following:

- Industry-recognized certificate or certification (Third-party credentials recognized by multiple employers)
- State licensure
- Registered Apprenticeship
- Credential included on a state or national credential registry

For (2):

- Brief narrative providing explanation and justification why the credential is the only one recognized for the occupation.

AND

Select one of the following:

- Industry-recognized certificate or certification (Third-party credentials recognized by multiple employers)
- State licensure
- Registered Apprenticeship
- Credential included on a state or national credential registry

AND

Select one of the following:

- Licensure/Certification pass rates for program completers
  - Credentials awarded by the IHE
  - Program documentation showing the credential is embedded in program completion requirements
  - Documented in AHEIS PST course file as Licensure/Certification
-

## **D. Postsecondary Pathways and Credit Mobility**

Programs must articulate into credit-bearing pathways.

Evidence, Process, and/or Policy

Credit applicability must be clearly defined and accepted toward credentials.

Select one of the following:

- Documented stackable pathway(s) within the IHE or with other IHE
  - Program prior learning credit policy or degree plan
  - Articulation agreement(s)
- 

## **III. State Process for Program Approval (34 CFR 690.93(b))**

*(Must determine the platform for institutions to submit applications.)*

### **A. Published Criteria and Workforce Alignment**

Evidence, Process, and/or Policy

Previously outlined in II (A).

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### **B. Employer Alignment Policy**

State policy for determining whether a program meets the hiring requirements of employers in the high-skill, high-wage, or in-demand sectors and occupations that the program prepares students for employment in, demonstrating the expected competencies for which the recognized postsecondary credential intends, align with the competencies needed in such high-skill, high-wage, or in-demand sectors and occupations.

Evidence, Process, and/or Policy

Institutions must:

- Submit employer evidence (Section II.B)  
AND
  - Provide a curriculum crosswalk or skills taxonomy linking course student learning outcomes/skills/competencies to industry standards identified by employers, industry associations, certifications, or ONET descriptions.
-

## **C. Stackability and Portability Policy**

Evidence, Process, and/or Policy

- Verified through Section II.C
- 

## **D. Credit for Prior Learning / Articulation Policy**

Evidence, Process, and/or Policy

- Verified through Section II.D
- 

## **E. Institutional Data Submission Requirements**

Evidence, Process, and/or Policy

Institutions must report program-level and student-level data to AHEIS (credit or PST files) as requested by ADHE, including but not limited to:

- Student First Name
  - Student Last Name
  - Student SSN
  - Student DOB
  - Student Race
  - Student Ethnicity
  - Student Sex
  - # Contact or Credit Hours Completed
  - Academic Year
  - Program or Degree Name
  - Credential Completion Type(s) or Degree Level
  - Program CIP Code
  - Program SOC Code
  - Program Start Date
  - Program Completion Date
  - # of Instructional Weeks
- 

## **IV. Review Timeline and Approval Process**

### **2026 Initial Implementation**

- Jan–Mar: ADHE/ACOM on behalf of the Governor’s Office draft an implementation plan.

- April: Governor’s Office reviews implementation plan and provides feedback. ADHE/ACOM incorporate feedback and edit as needed.
- Apr–May: Governor’s representative submits implementation plan to the State Workforce Board for review/approval.
- May: Institutions are notified of the implementation plan and approved SOCs and are invited to submit programs for review.
- May–June: Institutions submit new Workforce Pell program applications.
- June–July: Governor’s Office, ADHE, and ACOM review submissions to determine if the programs meet the requirements; ARData is consulted to confirm outcomes using SLDS and UI Wage Data.
- July: Governor’s representative submits a list of programs meeting requirements to the State Workforce Board for review/approval.
- End of July: Governor’s representative notifies institutions of program approval status and submits to the U.S. Department of Education.

### **Ongoing (2027+)**

- Jan–March: Institutions submit new or revised Workforce Pell program applications.
- Mar–Apr: Governor’s Office, ADHE, and ACOM review submissions to determine if the programs meet the requirements; ARData is consulted to confirm outcomes using SLDS and UI Wage Data.
- Apr–May: Governor’s representative submits a list of programs meeting requirements to the State Workforce Board for review.
- June–July: Governor’s representative notifies institutions of program approval status and submits to the U.S. Department of Education.

Evidence, Process, and/or Policy

- Standardized statewide review workflow
  - Use of administrative data for validation
- 

## **V. Appeals Process**

*(Must determine the platform for institutions to submit appeals.)*

A standardized appeals process ensures fairness and consistency. Institutions may appeal determinations through a formal, time-bound process.

Evidence, Process, and/or Policy

### **1. Right to Appeal**

An eligible institution may appeal a determination regarding whether a program meets the requirements outlined in 34 CFR 690.93(a).

Appeals are limited to final determinations and may be submitted only once per determination.

## **2. Grounds for Appeal**

An appeal must clearly demonstrate one or more of the following:

- Procedural Error: The process used to reach the determination did not follow established policies or timelines and materially affected the outcome
- Substantive Error: The determination was not supported by substantial evidence in the record
- New Information: Significant, relevant information that was not reasonably available at the time of review and could materially impact the decision

## **3. Filing Requirements**

Institutions must submit a written appeal that includes:

- Identification of the program and the determination being appealed
- A clear statement of the basis for appeal (aligned to the grounds above)
- Supporting documentation and evidence
- The specific remedy or outcome requested

Appeals must be submitted electronically to the Governor's office or designated state office.

## **4. Timeline for Filing**

- Appeals must be filed within 30 calendar days of the issuance of the written determination
- The appeal window begins only after the institution has received formal notice, including appeal instructions

## **5. Review Process**

### **a. Acknowledgment**

- The Governor's office or designated state office will acknowledge receipt of the appeal within 5 business days

### **b. Record Review**

- The review will be based on:
  - The original record submitted during program review

- Any additional materials permitted under the appeal grounds

### **c. Appeal Body**

- Appeals will be reviewed by an Appeals Panel consisting of a subset of the State Workforce Board to include:
  - Commissioner of the Arkansas Division of Higher Education, or designee
  - Director of Arkansas Workforce Connections, or designee
  - Board Member representing business and industry
- Panel members will submit their written decision to the Governor's office.

## **6. Decision Timeline**

- A written decision will be issued within 45–60 calendar days of receipt of a complete appeal
- The decision will include:
  - Findings of fact
  - Determination (affirm, modify, or remand)
  - Rationale for the decision

## **7. Outcomes of Appeal**

The Appeals Panel may:

- Affirm the original determination
- Modify the determination
- Remand the determination for reconsideration with specific guidance

## **8. Finality**

The appeal decision constitutes final agency action. No further administrative appeal is available, though institutions retain any rights available under applicable law.

## **9. Fair, Transparent, and Consistent Provisions**

To ensure fairness across all eligible institutions:

- Standardized templates and submission requirements will be used
- All appeals will be evaluated using the same criteria and documented rubric
- Timelines and procedures will be uniformly applied
- The state will publish:
  - Appeal procedures
  - Timelines
  - Contact information

## **VI. Governor Certification Process (34 CFR 690.93(d))**

The Governor will certify each approved program using a standardized template.

Evidence, Process, and/or Policy

Each certification includes:

- Program name, CIP, SOC(s)
- Approval date
- Verification of 12-month compliance
- Wage and outcome (70/70 requirement) validation via ARData
- Value-added earnings calculation (cost vs wages)
- Agreements to:
  - Provide documentation upon request
  - Notify federal agencies within 15 days of withdrawal
  - Provide additional information, as required

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## **VII. Data Validation and Outcomes Tracking (34 CFR 690.94)**

Leverage statewide data systems for outcome validation.

Evidence, Process, and/or Policy

- Annual process:
  - Sept/Oct: Institutions submit completer data through AHEIS
  - Oct/Nov: ADHE reviews and transfers data to ARData
  - Nov/Dec: ARData team connects UI Wage Data to WFP program completers
  - January: Finalized list of job placement data available Jan to determine continued program eligibility
- Used to:
  - Verify ≥70% completion and job placement rates
  - Determine continued eligibility

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## **VIII. Apprenticeship Provisions**

Registered Apprenticeship RTI programs are streamlined.

Evidence, Process, and/or Policy

- Automatically meet:
  - Occupation alignment
  - Employer demand requirements

- Must still meet all other eligibility criteria
  - Applies only to federally registered apprenticeships (not pre-apprenticeships)
- 

## **IX. Value and Cost Transparency**

Programs must demonstrate value relative to earnings.

Evidence, Process, and/or Policy

- State calculates Value-Added Earnings (VAE)
  - Included in Governor certification
- 

## **X. Continuous Approval and Renewal**

- Approval tied to Program Participation Agreement lifecycle
  - Annual data review required
  - Re-certification required prior to expiration
- 

## **XI. Interstate Agreements (Future Development)**

In the future, Arkansas will establish processes for:

- Bilateral agreements with other states
- Cross-state enrollment eligibility
- Data-sharing agreements for outcomes tracking

This will not be done for the initial Workforce Pell Program approval cycle.

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**Agenda Item 4: Action**  
**WIOA Combined State Plan Modification**  
**PY' 26-27**



Row Labels	Count of Commenter ID
Board Staff	14
CEO	14
Employer	10
Other	8
Board Member/Emplc	6
Community Org	6
Partner Staff	2
Board Member/Comrn	1
<b>Grand Total</b>	<b>61</b>

**Summary of Commenters:**

14 CEOs  
7 Board Members (6 of whom were also employers)  
10 Employers  
14 Board Staff  
6 Community Organizations  
2 Partner Staff  
8 Other (including errors)

**Summary of Top 6 Topics:**

35 Reduced Employer Responsiveness/Local Economic Strategy Differences  
29 Local Control  
17 Lack of Rural Access/In-Person Services  
8 Lack of Local/Stakeholder Consultation  
7 Local Staff Jobs  
6 Reduced Physical Locations

Commenter ID	Category Identified	Additional Description	Reporting Category	Local Control	Local Staff Jobs	Lack of Rural Access/In-Person	Reduced Locations	Lack of Consultation	Employer Responsiveness & Understanding of Local Differences	Other
2	Other	Community Action Partner	Community Org							Lack of inclusion of community action agencies as partners; misclassification as mandatory partners
3	Other		Other			X	X			
4	Private Citizen		Other							Interested in services - contacted/addressed
5	LWDB Director	NW	Board Staff							submitted in error; asked to delete
6	Other	AAR Corp (employer)	Employer						X	
7	CEO	Garland County Judge	CEO	X					X	
8	Private Citizen	Media company email address	Employer	X					X	
9	Private Citizen	Clearway Credit Union (employer)	Employer						X	Request: governance model & legal authority, employer rights maintained, performance accountability, operations/service for each area
10	CEO	Batesville Mayor	CEO						X	
11	Other	LWDB Member - Western	Board Member/Employer	X		X			X	
12	LWDB Member		Board Member/Employer			X				lack of data-driven justification; request: transparent, public-facing impact analysis
13	LWDB Member	Western	Board Member/Employer			X			X	
14	CEO	Mountain Home Mayor	CEO							Request redirecting funds to NW & allow locals to operate with these flexibilities under the waivers
15	State Workforce Agency Member	DSB	Partner Staff							Agency edits/corrections
16	CEO	Jackson County Judge	CEO	X					X	
17	CEO	Pope County Judge	CEO	X					X	
18	CEO	Independence County Judge	CEO	X					X	
19	LWDB Member	State Farm Ins (employer)	Board Member/Employer	X		X			X	
20	LWDB Member	Independence Co Broadband Comm	Board Member/Community Org	X		X				
21	LWDB Director	NC	Board Staff	X		X		X		Comments regarding local (not state) partnerships built, state capacity after recent RIF, previous local request of waivers
22	CEO	Izard County Judge	CEO	X					X	
23	LWDB Member		Board Member/Employer			X				
24	CEO	White County Judge	CEO							Opposes consolidation
25	Other	CAPDD staff	Board Staff							submitted in error; n/a
26	Other	"Test"	Other							submitted in error; n/a
27	Private Citizen	Southside School District	Community Org	X						work-based learning opportunities
28	CEO	Saline County Judge	CEO	X		X			X	Request: clear proposal, legal mechanism, affect to local entities/areas
29	CEO	Van Buren County Judge	CEO	X				X	X	
30	Private Citizen	Life Plus (employer)	Employer	X					X	
31	CEO	Stone County Judge	CEO	X				X		
32	Private Citizen	Lyon College	Community Org	X						
33	Partner Agency	White River Health	Employer	X		X			X	barriers for healthcare role entry
34	Other	First Community Bank of Batesville (employer)	Employer	X					X	
35	Other	Batesville Chamber (employers)	Community Org						X	
36	CEO	Cleburne County Judge	CEO	X				X		
37	Other	Bad Boy Mowers (employer)	Employer						X	work-based learning opportunities

38	CEO	City of Augusta	CEO						X	
39	Private Citizen	Former WC LWDB Director	Other	X					X	
40	Other	FARCO (employer)	Employer						X	
41	Private Citizen		Other				X			Locals should have opportunity for flexibilities, per metrics are incentive to avoid hardest cases,
42	Private Citizen		Other						X	
43	State Workforce Agency Member	ARS	Partner Staff							staff correction
44	Other	Peco Food (employer)	Employer							opposes consolidation
45	Private Citizen	Hot Springs Housing Authority	Community Org		X		X		X	how can one central office serve everyone instead of local offices
46	Other	SEAEDD staff	Board Staff		X	X				
47	Other	SEAEDD staff	Board Staff		X					
48	LWDB Director	NE	Board Staff	X		X	X		X	Fiscal liability of local CEOs, accountability for reallocation of funds across areas when state is service provider
49	CEO	Chicot County Judge	CEO	X		X		X	X	Request: clear changes, legal authority, impact to locals
50	State Workforce Agency Member	SEAEDD staff	Board Staff		X					
51	LWDB Member		Board Member/Employer	X	X	X	X	X	X	Request: transparent, public-facing analysis of impact and evidence-based justification
52	Other	Newton County Library	Community Org						X	localized programming
53	Private Citizen		Other							attending school; no comment; n/a
54	Partner Agency	WAPDD Exec Director	Board Staff	X					X	
55	Other	Citizens Bank in Batesville	Employer	X					X	
56	LWDB Director	SW	Board Staff	X	X				X	Redistributed funding away from rural regions
57	LWDB Director	SW	Board Staff			X	X			No strategy defined for declining regions
58	LWDB Director	SE	Board Staff	X	X			X	X	Funding decisions, operational transitions, accountability and perf oversight
59	Other		Other	X		X		X	X	Responding to state responses - unclear how obtained copy of preliminary state responses for state board review; state law issue; Request: federal & state legal questions, local impact analysis, service levels & local authority protected
60	LWDB Director	WAPDD Deputy Director	Board Staff	X		X			X	
61	LWDB Director	LR	Board Staff							Organization, coordination, oversight, & costs associated with regional councils, geographic boundaries of councils, membership, grievances
62	LWDB Director	LR	Board Staff						X	fiscal stewardship - securing additional funding for areas, not blame each other

# WIOA Combined State Plan- PY 26-27 Modification

## Public Comments Summary

The Arkansas Department of Commerce is pleased to announce that the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan program years 2026–2027 has now been published for public review. You may download the full plan by clicking [here](#).

This year’s modification includes several important enhancements, including proposed waiver requests, [encouraged by USDOL](#), designed to provide greater flexibility in service delivery, performance alignment, and system design, while improving efficiency and effectiveness. The plan also incorporates the full integration of the Perkins V Career and Technical Education State Plan, strengthening the connection between education, workforce preparation, and employer needs.

**The 30-day public comment period will open on Friday- April 17, 2026, and will close at 11:59 p.m. CT on Monday- May 18, 2026.**

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### **Week 1**

**April 17, 2026**

#### **Commenter 1a: “Other” 4/17/26 Section Reference pg. 94**

*“The Plan states “The WIOA Partners Roundtable supports the integration of WIOA and continues as a permanent cross-agency body to coordinate and align policy and ensure continued implementation of WIOA at state and local levels.” The CSBG State Office within the Arkansas Department of Human Services is not included on the WIOA Partners Roundtable. Including representation from the CSBG State Office could possibly help with coordination and communication regarding Community Action Agencies, as well as clarify which Community Action Agencies meet the definition of required partners under WIOA.”*

#### **Commenter 1b: “Other” 4/17/26**

*“The sentence on this page states “Arkansas continues to work with other required partners to align workforce development strategies including: JVSG, programs/services offered within American Job Centers; CSBG partnerships through the Department of Human Services and Community Action Agencies...” Classifying all Community Action Agencies as required one-stop partners under WIOA is not correct per the Code of Federal Regulations (20 CFR 678.400). Only Community Action Agencies carrying out CSBG-funded employment and training activities meet the definition of a required partner under WIOA. CAAs that do not operate employment and training programs should still have the opportunity to participate voluntarily as community referral partners or optional partners, depending on the programs and services they provide.”*

#### **State Response: Arkansas Workforce Connections-Office of Employment and Training**

The State will continue to work with all Community Action Agencies, both those who carryout CSBG-funded employment and training activities (required partners) and others who can still voluntarily be additional partners in the American Job Centers. Additionally, the State has provided technical assistance regarding the code of federal regulations to the CSBG oversight office at the Department of Human Services and will continue to coordinate with local partners to coordinate assistance services to participants in across the state. The braiding of services with partner programs is encouraged by the Department of Labor to maximize available funding.

## **Week 2**

**April 18, 2026- April 24, 2026**

### **Commenter 2: “Other” 4/20/26 Section Reference: ' System Transformation: Toward a “No Wrong Door” Model**

*“While I support the intent to streamline services and improve system efficiency, this plan, as proposed, does not adequately account for the realities of rural Arkansas and risks creating greater barriers to access.*

*The shift toward centralized governance and virtual service delivery assumes that residents have the ability to travel, access reliable internet, and independently navigate digital systems. That is not the reality in Southeast Arkansas and other rural regions.*

*This proposal does not sufficiently address:*

- *Transportation limitations that prevent residents from reaching centralized locations*
- *Lack of broadband infrastructure, making virtual access unreliable or impossible*
- *Aging populations who require direct, in-person assistance*
- *Lower education and digital literacy levels, which make virtual systems difficult to navigate without support*

*Eliminating or consolidating local access points without replacing them with strong, community-based solutions will further disconnect already underserved populations from critical workforce services.*

*At the same time, there is a long-standing pattern in this state where resources are centralized and tend to flow upward, consistently bypassing rural regions. This plan does not clearly disrupt that pattern. Instead, it risks reinforcing it under a more efficient structure that still leaves rural communities behind.*

*If the State is committed to a truly accessible workforce system, it must provide specific, actionable solutions, not assumptions. This includes:*

- *Investment in mobile and locally embedded service delivery*
- *Concrete plans to address transportation barriers*
- *Expansion of broadband and digital literacy support*
- *Guaranteed in-person navigation assistance*
- *Accountability measures to ensure equitable rural investment*

*Efficiency cannot come at the expense of access. Without these commitments, this plan will not serve all Arkansans equally and will disproportionately impact the communities that already face the greatest barriers.”*

### **State Response: Arkansas Workforce Connections-Office of Employment and Training**

Under the wavier proposals, the State will continue to allocate funding to each designated local area to ensure accountability for ongoing rural investment. In fact, the reduction in overhead and operational costs will enable greater investment in communities statewide, including under-served rural areas. As part of the Broadband, Equity, Access, and Deployment (BEAD) program, Arkansas was allocated more than \$1 billion to deliver broadband access to more than 79,000 homes and businesses across the state. This investment in broadband infrastructure will enable the State to expand access to services virtually to combat the transportation barrier faced by many participants, including those in rural areas. Common intake systems and referrals will also reduce many transportation issues on the front end for program

participants. Increased supportive service funding for eligible participants will be available due to the reduction in operating and overhead costs. This will also allow for increased enrollments and expanded work-based learning opportunities. The integration of WIOA Titles I and III staff will enable additional hands-on interaction when needed for customers facing digital literacy barriers.

The combined plan and waivers address a more robust service delivery model where services will be provided through multiple means: physical centers, virtual services, mobile unit visits in rural communities, entry points through a broader network of affiliate sites including adult education centers, rehabilitation centers, public libraries, community colleges, housing authority complexes, and municipality hot spots.

**Commenter 3: “Private Citizen” 4/21/26 Section Reference- WIOA Title I Adult program**

*“I am interested in the One Stick Phlebotomy training starting in June and need assistance with the tuition. How do I apply for tuition assistance?”*

**State Response: Arkansas Workforce Connections-Office of Employment and Training**

WIOA state staff followed up with this individual and referred them to the applicable WIOA Title I service provider for their location.

**Commenter 4a: “Other” 4/22/26 Section Reference- Page 201 (Waiver 1)**

*“Waiver #1: I am submitting this comment regarding the Arkansas WIOA Combined State Plan, specifically the waiver section beginning on page 201. I am concerned that the proposed changes would significantly reduce the ability of the workforce system to respond effectively to local employers and the unique conditions of local labor markets.*

*Local workforce boards and partners work directly with employers on a daily basis and have firsthand knowledge of hiring trends, skills gaps, seasonal workforce needs, wage pressures, and industry-specific challenges. This local insight allows workforce areas to respond quickly and appropriately when employers are struggling to fill positions or when economic conditions shift. A more centralized governance structure risks diluting that responsiveness by moving decision-making further away from the employers and communities most directly impacted.*

*Employers benefit from a workforce system that understands their local labor supply, commuting patterns, transportation barriers, and training capacity. When decisions about workforce strategy and investments are made at a statewide level, there is a greater risk that programs become generalized rather than aligned to real-time, local business needs. This can ultimately make the system less effective for employers seeking timely, customized workforce solutions.*

*For these reasons, I respectfully ask that the proposed waiver (#1) approach be reconsidered, with careful attention to how it may limit local labor market expertise, slow employer responsiveness, and reduce the effectiveness of workforce services for Arkansas businesses and jobseekers.*

**Commenter 4b: “Other” 4/22/26 Section Reference- Page 201 (Waiver 1)**

*Restate my concern regarding Waiver #1: I am submitting this comment regarding the Arkansas WIOA Combined State Plan, specifically the waiver section beginning on page 201. I am concerned that the proposed changes would significantly reduce the ability of the workforce system to respond effectively to local employers and the unique conditions of local labor markets.*

*Local workforce boards and partners work directly with employers on a daily basis and have firsthand knowledge of hiring trends, skills gaps, seasonal workforce needs, wage pressures, and industry-specific challenges. This local insight allows workforce areas to respond quickly and appropriately when employers are struggling to fill positions or when economic conditions shift. A more centralized governance structure risks diluting that responsiveness by moving decision-making further away from the employers and communities most directly impacted.*

*Employers benefit from a workforce system that understands their local labor supply, commuting patterns, transportation barriers, and training capacity. When decisions about workforce strategy and investments are made at a statewide level, there is a greater risk that programs become generalized rather than aligned to real-time, local business needs. This can ultimately make the system less effective for employers seeking timely, customized workforce solutions.*

*For these reasons, I respectfully ask that the proposed waiver approach be reconsidered, with careful attention to how it may limit local labor market expertise, slow employer responsiveness, and reduce the effectiveness of workforce services for Arkansas businesses and jobseekers. Starting with this, impacts the remainder of the plan, how it is administered and how funds are distributed.*

#### **State Response: Arkansas Workforce Connections-Office of Employment and Training**

Under the waiver proposals, the State will continue to obtain local input and feedback in the service delivery design of Title I programs. Regional advisory councils would allow elected officials and business leaders to provide input to the state board on issues directly related to their local areas. In addition, the regional mix of state board members enables local issues to be elevated directly to the state board by its members. Business customers would be included in the process, which is designed to create a better trained workforce, benefiting both local employers and participants seeking employment. Streamlined governance models also allow for increased responsiveness to employer labor-market demands and economic shifts by eliminating multiple layers of bureaucratic inefficiencies. (See also response to comment #3 above regarding rural investment and transportation/broadband barriers). In addition, regional stakeholder meetings will be held periodically to allow community members to provide direct input and feedback to local workforce strategies.

#### **Commenter 5: “Chief Elected Official” 4/22/2026 Section Reference (Waiver 1) Page 201**

*To Whom It May Concern:*

*On behalf of Garland County, I respectfully submit this public comment in opposition to any proposal that would eliminate, absorb, or materially weaken the role of Arkansas’s local workforce development boards without full compliance with applicable federal and state law. Specifically, Waiver #1 found on page 201 of the Draft dealing with waivers.*

*Garland County strongly supports continuous improvement, accountability, and responsible stewardship of public funds. However, the direction currently being discussed at the state level raises significant concerns. It appears to move Arkansas away from its established local governance structure and toward a more centralized model—one that could diminish local authority, reduce responsiveness to regional workforce needs, and limit the voice of local employers.*

*Local workforce development boards exist for a reason. They ensure that workforce strategies are grounded in real, on-the-ground conditions and reflect regional labor market dynamics, employer demand, input from local elected officials, and collaboration with education and training partners. These boards play a critical role in aligning workforce programs with the specific needs of each community, including Garland County.*

*At this time, we strongly oppose the proposal as it has been described and urge that workforce*

*development funding and decision-making authority remain at the local level.*

*Thank you for the opportunity to provide input on this important issue. We respectfully request that this comment be included in the official public record.*

*Sincerely,  
Darryl Mahoney  
Garland County Judge*

**State Response: Arkansas Workforce Connections-Office of Employment and Training**

Under the waiver proposals, the State will continue to obtain local input and feedback in the service delivery design of Title I programs. Regional advisory councils would allow elected officials and business leaders to provide input to the state board on issues directly related to their local areas. In addition, the regional mix of state board members enables local issues to be elevated directly to the state board by its members. Business customers would be included in the process, which is designed to create a better trained workforce, benefiting both local employers and participants seeking employment. Streamlined governance models also allow for increased responsiveness to employer labor-market demands and economic shifts by eliminating multiple layers of bureaucratic inefficiencies.

**Commenter 6: “Private Citizen” 4/22/26 Section Reference- Page 201 (Waiver 1)**

*“I am submitting this comment regarding the Arkansas WIOA Combined State Plan, specifically the waiver section beginning on page 201. I am concerned that the proposed waiver approach would weaken local governance, reduce local responsiveness, and create distance between workforce decisions and the communities they affect. Across the State, local board members, chief elected officials, employers, educators, labor representatives, and community partners bring direct knowledge of local hiring conditions, barriers to employment, transportation issues, training capacity, and business needs. A more centralized structure risks reducing that local input at the point where decisions are made. I am also concerned about the practical effect on employers and jobseekers. Local workforce areas are able to respond more quickly because they know their own labor markets, relationships, and service gaps. A statewide approach may look more efficient on paper, but it can also make service delivery less flexible and less accountable to the people and communities being served.*

*For those reasons, I ask that these waiver proposals be reconsidered carefully, with full attention to their effect on local governance, service access, and community level decision making.”*

**State Response: Arkansas Workforce Connections-Office of Employment and Training**

Under the waiver proposals, the State will continue to obtain local input and feedback in the service delivery design of Title I programs. Regional advisory councils would allow elected officials and business leaders to provide input to the state board on issues directly related to their local areas. In addition, the regional mix of state board members enables local issues to be elevated directly to the state board by its members. Business customers would be included in the process, which is designed to create a better trained workforce, benefiting both local employers and participants seeking employment. Streamlined governance models also allow for increased responsiveness to employer labor-market demands and economic shifts by eliminating multiple layers of bureaucratic inefficiencies.

**Commenter 7: “Private Citizen” 4/22/26 Section Reference- Page 201 (Waiver 1) & WIOA Title I-Adult Program**

*“4/23/2026*

*Arkansas Workforce Development Board  
Primary submission email: WIOA@arkansas.gov*

*Re: Public Comment on Proposed WIOA Governance Changes in Arkansas*

*To Whom It May Concern:*

*I am writing as the CEO of Clearway Credit Union in Malvern and as a local employer to express concern regarding the State's proposed changes to local workforce governance under the Workforce Innovation and Opportunity Act. From an employer perspective, the strength of WIOA is that it keeps workforce strategy close to the regional labor market. A shift toward a more centralized structure that reduces the role of local workforce development boards risks weakening employer engagement and slowing the feedback loop between local hiring needs and training decisions.*

*In Hot Spring County, employers rely on practical partnerships that connect jobseekers to credentials, work-based learning, and supportive services that improve retention. Those partnerships are built locally—through relationships with training providers, economic development, and industry leaders—and they are most effective when local boards can set priorities based on real-time conditions (open roles, wage pressures, seasonal demand, and emerging skill gaps).*

*Before moving forward, I respectfully request that the State provide a detailed, written proposal that explains: (1) the governance model being considered and the legal authority for the change; (2) how employer representation and decision rights will be maintained at the regional level; (3) how performance accountability will work (metrics, targets, and corrective action); and (4) how one-stop operations and service levels will be maintained or improved in each area. I also ask that no implementation steps be taken until required public comment, consultation with affected local partners, and federal review are fully completed.*

*Local governance is not a barrier to results—it is a core control that keeps workforce investments aligned to regional demand and accountable to employers and taxpayers. I urge the Arkansas Workforce Development Board and State leadership to preserve meaningful local authority and a strong employer voice, and to prioritize any reforms that demonstrably improve time-to-employment, credential attainment, and retention outcomes rather than concentrating decision-making further from the labor market it is intended to serve.*

*Thank you for the opportunity to submit this comment.*

*Sincerely,*

*Tammy Passafiume*

*CEO, Clearway Credit Union*

*Malvern, Hot Spring County, Arkansas*

**State Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 & 4 above.

**Commenter 8: “Chief Elected Official” 4/23/26 Section Reference- Page 201 (Waiver 1)**

*“On behalf of the City of Batesville, I write to express opposition to the proposed waiver to consolidate local workforce development areas into a single statewide model. Batesville serves as a regional economic hub for North Central Arkansas, with key industries including manufacturing, healthcare, and education. Major employers such as White River Health and a strong base of small and mid-sized manufacturers depend on a workforce system that understands local needs. Our community of roughly 11,000 residents, along with the broader Independence County region, benefits from workforce strategies tailored to rural economies and regional labor markets. Local workforce boards are essential to maintaining this responsiveness. A statewide model risks reducing flexibility and weakening the*

*partnerships that connect employers, schools, and job seekers. Workforce challenges vary significantly across Arkansas, and a centralized approach would limit our ability to address them effectively. For these reasons, the City of Batesville respectfully urges the Board to reconsider this waiver and preserve the strength of local workforce governance.”*

**State Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 & 4 above.

**Commenter 9: “LWDB Member” 4/23/26 Section Reference- Page 201 (Waiver 1) & WIOA Title I Dislocated Worker Program**

*“Public Comment Submission – Workforce Innovation and Opportunity Act (WIOA) Waiver Proposal*

*As a board member serving Western Arkansas, I respectfully submit the following comments regarding the proposed consolidation of all local workforce areas into a single statewide system.*

*I have significant concerns about the potential impact this change would have on rural communities like ours. The current WIOA structure is intentionally designed to support local governance, allowing regions to develop workforce strategies that reflect their unique economic conditions, employer needs, and participant barriers. Moving to a fully centralized model risks undermining that effectiveness.*

*Western Arkansas faces distinct challenges that differ greatly from more urban areas of the state. These include limited transportation infrastructure, fewer training providers, workforce shortages in critical industries, and geographic barriers that impact access to services. Our ability to respond to these realities depends on local decision-making, strong community partnerships, and flexibility in program design.*

*A statewide, one-size-fits-all approach may improve administrative efficiency on paper, but it could come at the cost of reduced responsiveness and weaker outcomes at the local level. Employers in our region rely on workforce programs that understand their specific needs, and jobseekers benefit from services that are tailored to their circumstances. Centralization risks creating distance between decision-makers and the communities they serve.*

*Additionally, local boards play a critical role in accountability, engagement, and innovation. The relationships we have built with employers, educators, and community organizations are essential to the success of workforce initiatives. These relationships cannot be easily replicated through a centralized structure.*

*I strongly urge careful consideration of the unintended consequences this proposal may have on rural workforce areas. Preserving local input, governance, and flexibility is essential to maintaining effective service delivery and achieving meaningful outcomes for both jobseekers and employers.*

*Thank you for the opportunity to provide input on this important matter and for your consideration of the unique needs of rural communities like Western Arkansas.”*

**State Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 & 4 above.

**Commenter 10: “LWDB Member” 4/24/26 Section Reference- (Waiver 1)**

*The proposed consolidation of Arkansas’s local workforce boards in favor of a centralized model is a strategic error that prioritizes administrative efficiency over participant outcomes. The state’s assumption that mobile, centralized caseworkers can replicate the efficacy of embedded local offices ignores the*

reality of rural service delivery, where "efficiency" is measured by the high-touch, integrated support that requires local presence, not by simply reducing overhead. By shifting from a fixed-cost model to one burdened by the significant, hidden costs of travel and reduced staff-to-participant contact time, the state risks creating a system that is cheaper to run but fundamentally incapable of serving the hard-to-reach populations that depend on local expertise. Consequently, this transition lacks a data-driven justification for how it will maintain—let alone improve—long-term employment success, and it should be rejected until a transparent, public-facing impact analysis proves it will not result in a net diminishment of essential services for Arkansans. In closing, The metrics that you are using to justify these claims are false and can not be proven. You are changing the rules during this change so no accurate comparison of the two plans will exist, and the only justification for this move is a power grab at the state level for control of the funding.

**State Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 & 4 above. Additionally, data being shared in the state's justification for multiple waiver requests are based on actual grant expenditure and performance reporting data submitted by local workforce development boards. The state is working with staff of the lwdbs to reconcile any discrepancies with self-reporting data. WIOA Annual reports and local workforce board monitoring reports also provide context and background on local performance over the course of the several years.

**Commenter 11: "LWDB Member" 4/24/26 Section Reference- (Waiver 1)Pg. 201**

*"waiver 1. I appreciate the opportunity to provide feedback on the proposed consolidation under WIOA.*

*While I understand the goal of improving efficiency, I have concerns about the impact this may have on rural regions like Western Arkansas. Workforce challenges here such as transportation barriers, limited training access, and ongoing workforce shortages are highly local and require flexible, region-specific solutions.*

*From an employer perspective, workforce development is most effective when it is closely aligned with local industry needs. In our experience, locally driven strategies allow for faster response, stronger partnerships, and more relevant training outcomes. A centralized approach risks reducing that responsiveness and may make it more difficult to meet the needs of both employers and jobseekers in rural communities. I would encourage careful consideration of how local input and flexibility will be preserved moving forward, as those elements are critical to continued success. Thank you for your time and consideration."*

**State Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 & 4 above.

**Week 3**

**April 25, 2026- May 1, 2026**

**Commenter 12a: "Chief Elected Official" 4/27/26 Section Reference- (Waiver 4)Pg. 205**

*"The local areas have been requesting this waiver for some time now. Northwest typically spends all of its allotted money and has requested that funds be redirected from other areas to serve Northwest better. If given the opportunity Northwest will serve more participants with funding"*

**Commenter 12b: "Chief Elected Official" 4/27/26 Section Reference- (Waiver 5)Pg. 212**

*"Local workforce areas have been requesting this flexibility for several years, recognizing that a waiver under the Workforce Innovation and Opportunity Act would allow them to operate more efficiently and*

*better serve participants. With fewer administrative constraints, local programs could streamline the delivery of supportive services—reducing the need to manage multiple funding streams for each individual—and instead focus on timely, coordinated assistance. This would not only ease administrative burden on staff but also create a more seamless experience for participants, who often struggle to navigate complex systems. Additionally, the ability to directly cover tuition costs with greater flexibility would enable local areas to respond more quickly to training needs, align participants with in-demand careers, and remove financial barriers that delay or prevent individuals from entering the workforce. If given the opportunity the use of this waiver by Northwest can accelerate enrollment into training, reduce administrative burden, improve access for underserved populations, increase credential attainment, and support employer demand”*

**State Response: Arkansas Workforce Connections-Office of Employment and Training**

Waiver #4- The state is not familiar with a prior request from local areas for a waiver of this nature. Recaptured funds from LWDAs, contingent upon total amount, have historically been redistributed to local areas for program use, with the intent of keeping investments in the local areas for training and supportive services. In recent years, The NWAODA received additional state set aside funds to carry out rapid response services for dislocated workers impacted by a company’s mass layoff. This is a state standard to support these types of efforts.

Waiver #5- The state agrees with the reasoning behind this comment yet concerns still remain around optimum efficiencies due to the ten workforce board structure and inconsistencies surrounding service delivery and policies.

**Commenter 13: “State Workforce Agency Member” 4/29/26 Section Reference- WIOA Title IV- Division of Services for the Blind pgs. 347-357**

*Sections reflecting DSB staff members that are no longer positions in the agency should be edited to reflect new coverage or planning for those changes. For example, DSB Trainer, DSB Business Engagement Coordinator, and DSB Transition Manager.*

**State Response: Arkansas Workforce Connections- Division of Services for the Blind**

None

**Commenter 14: “Chief Elected Official” 4/29/26 Section Reference- (Waiver 1)Pg. 201**

*As County Judge of Jackson County, I strongly oppose the proposed WIOA waiver that would empower the State Workforce Development Board to replace all local workforce boards, eliminating local control across Arkansas. This initiative threatens the North Central Arkansas Workforce Development Area, which serves Jackson County alongside Cleburne, Fulton, Independence, Izard, Sharp, Stone, Van Buren, White, and Woodruff Counties.*

*Jackson County's economy, centered on agriculture, manufacturing, and logistics, faces unique challenges like a declining labor force participation rate from 52.5% to 46.2% between 2019 and 2024, alongside a February 2025 unemployment rate of 5.14%. Local boards deliver customized training and job placement suited to these needs, including efforts through our Work Ready Community status where over 700 residents hold ACT National Career Readiness Certificates. State-level centralization would impose generic programs, ignoring rural realities and worsening job shortages in our region.*

*Removing local boards cuts off vital collaboration among elected officials, businesses, and community leaders, diminishing accountability and effectiveness. This shift risks undermining targeted initiatives critical for economic recovery and workforce development in Jackson County. Please reject this waiver and maintain local boards to support Arkansas's diverse communities.*

**State Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 & 4 above.

**Commenter 15: “Chief Elected Official” 4/29/26 Section Reference- (Waiver 1)Pg. 201**

*As the chief local elected official and current President of the West Central Arkansas Planning and Development District, I am submitting this comment regarding the Arkansas WIOA Combined State Plan, specifically the waiver section beginning on page 201. I am concerned that the proposed waiver approach would weaken local governance, reduce local responsiveness, and create distance between workforce decisions and the communities they affect. Across the State, local board members, chief elected officials, employers, educators, labor representatives, and community partners bring direct knowledge of local hiring conditions, barriers to employment, transportation issues, training capacity, and business needs. A more centralized structure risks reducing that local input at the point where decisions are made.*

*I am also concerned about the practical effect on employers and jobseekers. Local workforce areas are able to respond more quickly because they know their own labor markets, relationships, and service gaps. A statewide approach may look more efficient on paper, but it can also make service delivery less flexible and less accountable to the people and communities being served.*

*For those reasons, I ask that these waiver proposals be reconsidered carefully, with full attention to their effect on local governance, service access, and community level decision making.*

**State Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 & 4 above.

**Commenter 16: “Chief Elected Official” 4/29/26 Section Reference- (Waiver 1)Pg. 201**

*As County Judge of Independence County, I write to express strong opposition to your proposed waiver under the Workforce Innovation and Opportunity Act (WIOA) that would allow the State Workforce Development Board to act as all local workforce boards, effectively eliminating local control.*

*The North Central Local Workforce Development board tailors workforce programs to regional needs, such as addressing Independence County's specific economic challenges in manufacturing, healthcare, and agriculture amid Arkansas's growing job gaps. Centralizing control in Little Rock would remove this customization, leading to one-size-fits-all strategies that overlook rural issues. Independence County, certified as a Work Ready Community with strong local initiatives like IMPACT Independence County, relies on these targeted efforts for low unemployment and economic growth.*

*Eliminating local boards direct input from chief elected officials, businesses, and residents, will reduce accountability and responsiveness. This could hinder partnerships essential for work-based learning and training, exacerbating workforce shortages in our 10-county region. I urge you to reject this waiver during the public comment period and preserve local workforce development boards to better serve Arkansas communities.*

**State Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 & 4 above.

**Commenter 17: “LWDB Member” 4/29/26 Section Reference- (Waiver 1)Pg. 201**

*I am writing on behalf of Renee Martin State Farm Insurance, a locally owned insurance business serving families, individuals, and employers in Independence County, Arkansas. We strongly oppose the proposed waiver the Arkansas State Workforce Board is submitting to the U.S. Department of Labor to consolidate*

*local workforce boards into a single state-run entity and reduce the role of local workforce development areas.*

*Our business depends on a healthy local workforce. In insurance, we serve people face-to-face every day, including clients who need personal guidance, job seekers who are trying to rebuild stability, and employers who need dependable workers to keep their businesses operating. Local workforce boards, specifically the North Central Local Workforce Board, are important because they understand the specific needs of communities like Independence County, where transportation barriers, workforce gaps, and local employer relationships are best addressed close to home.*

*We are especially concerned that consolidating local boards and shifting services away from local offices will reduce access for the people who need these services most. A statewide, centralized model may look efficient on paper, but it risks creating distance between decision-makers and the communities they serve. We are also concerned about the effect this waiver could have on local accountability, local partnerships, and the ability of businesses to work directly with workforce leaders in their region. Employers need a responsive system, which the North Central Local Workforce Board has exceeded at, that understands local labor market conditions and can adapt quickly to changing needs. Independence County businesses benefit when workforce services remain local, accessible, and grounded in the realities of our area. For these reasons, I respectfully urge the Arkansas State Workforce Board to withdraw or reject this waiver request and preserve the local workforce board structure. We believe Arkansas should strengthen local workforce systems rather than centralize them in a way that could reduce access, responsiveness, and community trust.*

**State Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 & 4 above.

**Commenter 18: “LWDB Member” 4/30/26 Section Reference- (Waiver 1)Pg. 201 & Pg. 62**

*As the lead of the Independence County Broadband Committee (ICBC) and Member of the North Central Local Workforce Board, I am writing to oppose any effort to consolidate WIOA Title I-B services from Local Workforce Boards to a State-run system.*

*On page sixty-two (62), the State plan indicates that the State intends to increase service capacity by expanding virtual services. Many rural areas in Arkansas still lack reliable broadband, so virtual services would create a barrier for the people who need workforce help the most. In Independence County for example, more than 45% of the broadband serviceable locations do not have broadband access. That reality will not change substantially until sometime between 2028 and 2030. Even so, many will not have the training to use the services nor will they be able to afford to pay for the services when they are deployed. Job seekers in rural communities often need face-to-face support, transportation assistance, and personal guidance that cannot be replaced by online interaction. This element of the State plan is fundamentally flawed.*

*The North Central Local Workforce Board plays a critical role in making sure services are responsive to the needs of each community. Rural counties, small towns, and underserved regions have different workforce challenges than larger metro areas. The North Central Local Workforce Board understands those differences, maintains relationships with area employers and responds quickly to changing needs in their communities. Consolidating the local workforce boards into a single state board would significantly weaken local decision-making and reduce the ability to tailor services to the people who need them most.*

*Reject any proposal that would limit access to local, in-person workforce services and would eliminate the budget and administrative authority currently held by the North Central Local Workforce Board.*

F. Hal Vandiver, Member  
North Central Local Workforce Board

**State Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 & 4 above.

**Commenter 19a: “LWDB Staff” 4/30/26 Section Reference- WIOA Title I Adult Program -Pg. 56**

*The second bullet under weaknesses states that AWC has strengthened partnerships among Arkansas Community Colleges through engagement with local workforce development boards and the co-location of Arkansas Workforce Centers on college campuses. However, this does not reflect the North Central region, where these initiatives have been developed and implemented by the North Central Local Workforce Development Board (NCLWDB), not AWC. The NCLWDB submitted two affiliate centers for approval—located at Ozarka College in Melbourne and the University of Arkansas Community College at Batesville—without AWC involvement in their establishment.*

**State Response: Arkansas Workforce Connections- Office of Employment and Training**

Local workforce development boards are currently subcontracted by the state to carry out WIOA Title I-B services on behalf of the Governor, state and designated local workforce development area. The sub agreement describes these activities as a required function and term of funding and standard operations.

**Commenter 19b: “LWDB Staff” 4/30/26 Section Reference- WIOA Title I Adult Program -Pg. 57**

*The second bullet on this page notes that Arkansas Workforce Connections staff were affected by a reduction in force, resulting in approximately 25 layoffs. In other sections of this plan, the State confidently says they will hire a new workforce staff to implement the WIOA Title I-B program. This raises concerns regarding the State’s capacity to assume responsibility for WIOA Title I-B while managing its existing programs.*

**State Response: Arkansas Workforce Connections- Office of Employment and Training**

Recent layoffs impacted WIOA Title III and Division of Services for the Blind staff. In the proposed structure under the waivers, WIOA Titles I and III staff will operate under a consolidated service delivery model further reducing duplicative operational costs while increasing additional support through staff capacity who will be cross trained for both programs. Currently WIOA Title III staff are limited to Wagner Peyser-employment services functions. Under the waiver, these services will continue to be offered along with recruitment, outreach and intake for WIOA Title I.

**Commenter 19c: “LWDB Staff” 4/30/26 Section Reference- WIOA Title I Adult Program -Pg. 61**

*The first sentence of the response states that Arkansas will be “well poised” to provide workforce and talent development activities upon approval of the waiver requests. It is important to note that several of these waivers, excluding consolidation, have been proposed to the State over the past five years without action and would have increased local areas performance. Their advancement, concurrent with the State’s proposed assumption of the program may be perceived by local areas as dismissive of prior efforts.*

**State Response: Arkansas Workforce Connections- Office of Employment and Training**

The state has routinely explored all recommendations presented by local workforce development area representatives. No formal waiver proposals have been submitted by local workforce development boards, however all topics have been noted and researched for regulatory allowability and suitability. Specific

topic areas that met the aforementioned criteria were elevated to the US Department of Labor for consideration and technical assistance.

**Commenter 19d: “LWDB Staff” 4/30/26 Section Reference- WIOA Title I Adult Program- Pg. 62**

*In the final sentence of the paragraph following Criterion 6, the State indicates that it plans to increase capacity, particularly in rural areas, by expanding virtual services. However, this approach may not be viable in rural communities who do not have access to broadband. For example, in Independence County alone, 46.9% of the population is broadband deficient. This underscores the importance of maintaining local workforce boards that have a clear understanding of the barriers to employment within their communities.*

**State Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see response to comment # 2 above.

**Commenter 19e: “LWDB Staff” 4/30/26 Section Reference- (Waiver 1)Pg. 201**

*The central theme is that state workforce leadership engaged local workforce boards for months regarding potential waivers intended to improve program operations, while repeatedly indicating that consolidation of local areas was not under consideration “anytime soon.” Despite these assurances, a special-called meeting of the Arkansas Workforce Development Board in late March 2026 introduced and approved a consolidation waiver with very short notice and minimal opportunity for local input.*

*On June 3, 2025, state workforce leadership asked local areas to identify waivers that could be requested from the U.S. Department of Labor to improve operational efficiency. It was explicitly stated that any waivers submitted would not constitute a state mandate, and consolidation of local areas was not mentioned.*

*On June 16, 2025, the ten local areas met virtually to identify waivers they believed would benefit Arkansas. Discussions focused on tuition and fee flexibility regardless of Pell Grant receipt, and increasing On-the-Job Training reimbursement rates to 90% for small businesses.*

*In late 2025, the ten Executive Directors met in Little Rock with state workforce leadership to further discuss these proposals. No plan or intent to consolidate local workforce areas was mentioned during this meeting.*

*On March 11, 2026, the North Central Local Workforce Board held its quarterly meeting, with a state workforce representative attending as a guest speaker. During discussion, it was suggested that the Board could authorize the State to assume responsibility for business services statewide. When asked directly about consolidation of local workforce areas, the response given was that it was not being considered “anytime soon.”*

*On March 24, 2026, Arkansas Workforce Connections issued a public notice of a special-called State Board meeting scheduled for March 26, 2026, without an agenda initially posted. On March 25, 2026, state leadership notified local workforce boards that the meeting would include “significant changes” impacting the statewide system. An agenda later appeared, revealing for the first time that consolidation would be considered.*

*On March 26, 2026, several local Executive Directors and staff traveled to Little Rock to attend the meeting. Upon arrival, they were directed to a separate room to view the proceedings remotely rather than being seated in the boardroom, despite visible available seating.  
Ongoing monthly Directors’ meetings*

*Throughout this period, monthly Directors' meetings were held by Arkansas Workforce Connections. At no point during these meetings was consolidation discussed, indicating that local leadership was not engaged in an open or ongoing dialogue on this issue prior to the March 2026 action.*

*On April 8, 2026, an in-person Directors' meeting was held in Little Rock to discuss the consolidation waiver. State leadership was not fully represented, and while local staff raised multiple questions, many remained unanswered, reflecting continued uncertainty and lack of clear guidance following the vote to precede with the comment period of the waivers.*

**State Response: Arkansas Workforce Connections- Office of Employment and Training**

The state has successfully engaged a myriad of workforce system stakeholders prior to and during the development of the state plan. These efforts will continue throughout the public comment period and will remain a standard throughout implementation of the waivers, including a formal transitional period that is anticipated to begin in the second quarter of program year 2026.

**Commenter 19-additional comments: "LWDB Staff" 4/30/26 Section Reference- N/A**

*The proposal of consolidation appears inconsistent with the intent and structure of the Workforce Innovation and Opportunity Act (WIOA). Federal law establishes local workforce development boards as a required component of the workforce system, with defined membership, responsibilities, and functions in each local area. These boards are not merely advisory in nature; rather, they are a central element of the statutory framework designed to ensure local accountability, employer engagement, and regionally responsive service delivery.*

*While waivers may provide flexibility in program administration, they are not intended to remove statutory requirements or dismantle governance structures explicitly established by Congress. A transition from multiple local boards to a single statewide model would extend beyond administrative flexibility and would fundamentally alter the structure of the workforce system as outlined in federal law.*

*Eliminating these boards would reduce local representation and could weaken the alignment between workforce services and local economic needs. Such an outcome would be inconsistent with the intent of WIOA, which emphasizes locally driven and regionally responsive workforce solutions rather than centralized governance.*

**State Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 & 4 above.

In November 2025, USDOL published Training and Employment Guidance Letter (TEGL 05-25) which describes waiver flexibilities and applicable laws and regulations encouraging states to maximize innovation. The TEGL offers options that the public workforce system can use to innovate and modernize operations and program services by using existing WIOA flexibilities, and encourages increased waiver use to scale industry-driven strategies, enhance worker mobility, create opportunities to integrate systems and realign resources, optimize service delivery, improve accountability for participant outcomes, and remove barriers to innovation.

This TEGL encourages states and local boards to assess their existing state and local policies, evaluate state legislative flexibilities, and identify opportunities to modernize operations and service delivery in alignment with the five strategic pillars. It promotes the maximum use of WIOA waiver authority to achieve this purpose and provides clarification on allowable uses of funds and other WIOA flexibilities. ETA recognizes that certain statutory requirements and federal mandates may have previously prevented

state and local leaders from instituting the reforms necessary to better serve America’s workers and businesses. This TEGl is intended to encourage state and local leaders to reconsider what is possible and partner with ETA to achieve the bold vision for reform set forth by the current Administration.

States are encouraged to request waivers of existing WIOA statutory or regulatory requirements that can help overcome specific barriers to innovation and align with the five strategic pillars for workforce investment. Under the Secretary of Labor’s (Secretary) waiver authority outlined in WIOA sec. 189(i)(3)(A), the Secretary may waive certain provisions of WIOA Title I subtitles A, B, and E and provisions found in Sections 8 – 10 of the Wagner-Peyser Act.

States are empowered to identify where current policies impede system modernization and to adopt existing waivers or propose new waivers that support the key priorities of industry-driven strategies, worker mobility, integrated systems, accountability, and flexibility and innovation.

**Commenter 20: “Chief Elected Official” 5/1/26 Section Reference- (Waiver 1)Pg. 201**

*As County Judge of Izard County, I convey my unwavering resistance to the proposed WIOA waiver granting the State Workforce Development Board authority over all local boards, which would eradicate community-led oversight. Raised in your March 2026 proceedings, this threatens the North Central Arkansas Workforce Development Area serving Izard County and its nine counterparts.*

*Izard County thrives on agriculture, limestone quarrying, outdoor recreation around Horseshoe Bend Lake, and niche manufacturing, but battles entrenched issues like rugged terrain, school-to-work transitions for youth, and skill mismatches in seasonal industries. Our local board continues with on-site vocational fairs, strong relationships with local drug courts, and employer-specific upskilling that align directly with these dynamics, fostering resilience amid Arkansas's workforce crunch. Shifting to state control would dilute these precise efforts, leaving our dispersed population underserved and economic opportunities untapped.*

*Abolishing local boards would sever foundational alliances between officials, local employers, and families, replacing them with remote directives unresponsive to daily needs. In Izard County, these bonds have proven essential for rapid response to labor demands and community buy-in. I ask that you abandon this waiver and preserve local boards to empower Arkansas's unique regional workforces.*

**State Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 & 4 above.

**Commenter 21: “LWDB Member” 5/1/26 Section Reference- (Waiver 1)Pg. 201**

*I am writing to express my strong opposition to the proposed consolidation of Arkansas’s local workforce development areas into a state-run system. This change would not be beneficial to participants in rural areas. Many rural communities in Arkansas face barriers such as limited broadband access, transportation challenges, and fewer local service options. Participants in these areas often depend on local workforce boards for in-person support, direct referrals, and services that are responsive to the needs of their communities. Participants, especially in rural Arkansas, will be the ones suffering if this waiver is approved.*

*I respectfully urge the Board to reject any waiver that would consolidate local workforce boards and to preserve a local system that remains accessible, responsive, and effective for rural participants across the state.*

**State Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 & 4 above.

**Commenter 22: “Chief Elected Official” 5/1/26 Section Reference- (Waiver 1)Pg. 201**

*I strongly oppose this consolidation. Many citizens have used these programs to obtain skills to make a better life for themselves, particularly the commercial driving program.*

**State Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 & 4 above.

**Week 4**

May 2, 2026-May 9, 2026

**Commenter 23: “Private Citizen” 5/4/26 Section Reference- (Waiver 1)Pg. 201**

*Southside School District opposes transitioning WIOA Title I-B to a state-run model, as locally administered programs are essential in supporting students and community members in workforce readiness. Southside School District has partnered with the North Central Local Workforce Board to provide in-school youth with meaningful work-based learning opportunities, helping students gain valuable skills and real -world experience while preparing for future careers. Please reject any waiver that removes the North Central Local Workforce Board.*

**State Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see the responses to comments #2 & #4 above.

**Commenter 24a: “Local Elected Official” 5/4/2026 Section Reference- N/A**

*To Whom It May Concern:*

*I am writing in my capacity as County Judge for Saline County, Arkansas to express concern regarding the State’s proposed changes to local workforce governance under the Workforce Innovation and Opportunity Act. Based on publicly discussed materials and recent board actions, the State appears to be moving toward a more centralized structure that could reduce or absorb the role of local workforce development boards.*

*For communities like ours, this is not an abstract governance issue. Local workforce systems work best when decisions are informed by local employers, local elected officials, local training providers, and the actual needs of the people seeking work and training. A statewide structure may sound more efficient on paper; but it risks creating more distance between policy decisions and the communities those decisions affect.*

*Our local area has its own labor market conditions, transportation realities, employer demands, and service delivery challenges. What works in one part of Arkansas may not work in another. That is exactly why local boards are critical to the areas they serve. They provide structure for local planning, one-stop oversight, employer engagement, and alignment with community conditions that cannot be fully understood from a centralized vantage point.*

*I am particularly concerned that this proposal could weaken the role of local elected officials and reduce the voice of local business and community leadership in workforce policy. WIOA was built around meaningful local participation. Any proposal that materially changes that framework should be approached with full transparency, full consultation, and a clear explanation of legal authority and local impact.*

*I respectfully ask the State to clearly identify what it is proposing, the legal mechanism it intends to use, and how these changes would affect local workforce development boards, chief elected officials, employer engagement, one-stop oversight, and service delivery in each region. I also ask that no implementation steps be taken until all required public comments, consultation, and federal review processes are fully completed.*

*I further urge the State to weigh the practical effect on communities like Saline County. In our area, workforce decisions affect major employers in education, healthcare, and manufacturing, as well as the ability of residents to access jobs across Benton, Bryant, and more rural parts of Saline County where transportation can be a barrier. They also directly impact the success of our regional Comprehensive Economic Development Strategy, which is built on locally driven priorities, employer engagement, and coordination across Central Arkansas. A governance structure that weakens local inputs risks undermining those efforts and the regional alignment they depend on.*

*This concern is not hypothetical for our community. In 2023, the State closed the Workforce Center in Benton, requiring job seekers in Saline County to travel outside the county to access Arkansas Workforce services. That change has already created additional barriers for residents, particularly those with limited transportation options. At the same time, our local workforce system benefits from direct input by business leaders such as David Chreene of Pafford medical Services and Justin McCauley of McCauley Services, who serve on the local workforce development board. Their involvement ensures workforce services remain aligned with real employer needs, and that kind of local insight is critical to building an effective system.*

Local voice is not an obstacle to workforce development. It is one of the reasons the system works at all. I urge the Arkansas Development Board and State leadership to preserve meaningful local governance and to avoid changes that would hollow out local authority in the name of centralization. Thank you for the opportunity to submit this comment.

**State’s Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 and 4 above.

**Commenter 24b & c: “Local Elected Official” 5/4/2026 Section Reference- N/A** :Repeat of comment 25a

**State’s Response: Arkansas Workforce Connections- Office of Employment and Training:**

Please see responses to comments #2 and 4 above.

**Commenter 25: “Local Elected Official” 5/4/2026 Section Reference -(Waiver 1) Pg. 201**

*As Van Buren County Judge, I do not believe it will benefit our local communities to remove CEO voting rights through consolidation. Those voices are essential to ensuring decisions reflect the real needs of our workforce and local economies. The North Central Local Workforce Board has made a meaningful impact by connecting individuals to jobs and training opportunities that strengthen our communities. Unfortunately, the way the State has handled this process has left local leaders in the dark, with limited communication and little opportunity for input on decisions that directly affect our regions.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training:**

Please see responses to comments #2, 4, and 21 above.

**Commenter 26: “Private Citizen” 5/4/2026 Section Reference -(Waiver 1) Pg. 201**

*Life Plus is opposed to the consolidation of WIOA Title I-B, as local workforce boards play a critical role in connecting individuals to meaningful employment and training opportunities. A shift to state control may reduce the personal, community-focused approach that has proven successful in the North Central region, ultimately putting those who depend on these services at a disadvantage.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training:**

Please see responses to comments #2 and 4 above.

**Commenter 27: “Chief Local Elected Official” 5/4/2026 Section Reference- (Waiver 1) Pg. 201**

*As Judge of Stone County, located within the North Central Local Workforce Area, I respectfully oppose Waiver Number One, which would eliminate the North Central Local Workforce Board. Over the past decade, this region has made significant and commendable progress in advancing workforce development, particularly in serving individuals who face substantial barriers to employment.*

*As a Chief Elected Official in North Central, I am concerned that local leadership was not consulted prior to the presentation of this waiver to the Arkansas Workforce Board. This lack of transparency raises serious concerns about the process and its implications for our communities.*

*I urge the members of the Arkansas Workforce Board to reject this waiver and instead focus on strengthening and supporting local workforce boards, which are best positioned to understand and meet the needs of their regions.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, 4, and 19.

**Commenter 28: “Private Citizen” 5/4/2026 Section Reference- (Waiver 1) Pg. 201**

*Lyon College opposes the consolidation of WIOA Title I-B, as local workforce systems play a vital role in supporting students and community members seeking education and career advancement. Transitioning to advisory boards diminishes that impact, as these groups lack voting authority and cannot meaningfully influence decisions that affect their own communities. Please reject waiver number one.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 and #4.

**Commenter 29 “Private Agency” 5/4/2026 Section Reference -(Waiver 1) Pg. 201**

*White River Health opposes moving WIOA Title I-B to a centralized state model, as local workforce partnerships are essential in developing a skilled healthcare workforce. Through collaboration with regional workforce leaders, we are able to support training pathways that directly benefit both our organization and program participants. Centralization could weaken these partnerships and create barriers for individuals seeking entry into critical healthcare roles. White River Health has partnered with the North Central Arkansas Workforce Board to offer valuable work experience opportunities for participants. Eliminating the local board would reduce the timely support and in-person collaboration we currently depend on. For these reasons, we respectfully urge rejection of the consolidation waiver.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 and #4.

**Commenter 30 “Other” 5/4/2026 Section Reference- (Waiver 1) Pg. 201**

*First Community Bank of Batesville respectfully opposes the transition of WIOA Title I-B to a state-administered model. Local governance has proven essential in ensuring workforce development initiatives are closely aligned with the unique economic conditions and employment needs of our region. Locally*

*driven systems foster stronger collaboration with area employers, enable more timely and targeted responses to workforce demands, and promote efficient allocation of resources. A shift to centralized administration risks diminishing this responsiveness and weakening the connection between workforce programs and the communities they are intended to serve.*

**State’s Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 and #4.

**Commenter 31 “Other” 5/4/2026 Section Reference -(Waiver 1) Pg. 201**

*From the perspective of the Batesville Area Chamber of Commerce, the accessibility and responsiveness of the North Central Local Workforce Board are highly valued. When job seekers come through our doors, the ability to quickly connect with a career specialist—whether by arranging an immediate visit or directing individuals nearby for prompt assistance—provides a level of convenience and efficiency that is critical to both businesses and job seekers.*

*This strong local connection and responsiveness have a meaningful impact on workforce outcomes. There is concern that a state-administered system may not be able to replicate this level of service, potentially resulting in a loss of efficiency and the personalized support that our community has come to rely upon. Please reject the consolidation waiver and instead focus on supporting the North Central local workforce board.*

**State’s Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 and #4.

**Commenter 32 “Chief Local Elected Official” 5/4/2026 Section Reference- (Waiver 1) Pg. 201**

*As Judge of Cleburne County, I’ve seen firsthand the value of local workforce leadership that understands the unique needs of our communities. Moving to a state-run model risks taking away the voice of local CEOs who are deeply invested in the success of their areas and who play a critical role in shaping effective workforce solutions. Equally concerning is the lack of transparency throughout this process, which has left many local leaders without clear information or meaningful input. Decisions of this magnitude should involve the communities they impact most.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, 4 and 19.

**Commenter 33 “Other” 5/4/2026 Section Reference- (Waiver 1)- Pg. 201**

*Bad Boy Mowers in Batesville opposes the transition of WIOA Title I-B to a state-administered model, as locally directed workforce systems have been instrumental in reaching the hard to serve population. Through our partnership with the North Central Arkansas Workforce Development Board, we have successfully provided meaningful work-based learning opportunities for program participants, helping individuals gain practical skills while addressing real workforce demands within our company. This collaboration reflects the value of local oversight, where programs are shaped by direct employer input and community priorities. Please reject Waiver number one.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 and #4.

**Commenter 34 “Chief Local Elected Official” 5/4/2026 Section Reference- (Waiver 1) - Pg. 201**

*The City of Augusta has truly benefited from the North Central Local Workforce Board's hands-on approach to connecting people with jobs and educational opportunities right here in our community. Their local focus makes a real difference—you're not just a number; you're a neighbor. That's why the idea of state consolidation is concerning; it risks losing that personal touch and local understanding that has helped so many individuals succeed.*

**State's Response: Arkansas Workforce Connections-Office of Employment and Training:**

Please see responses to comments #2 and 4 above.

**Commenter 35a "Private Citizen" 5/5/2026 Section Reference -Executive Summary - Pgs. 4-6**

*The Executive Summary references transitioning from ten independent local workforce development boards to a model where the State Board assumes local board functions. This shift represents a clear move away from local governance. Local boards are designed to reflect regional labor market conditions and employer needs. Removing or absorbing those boards reduces the system's ability to respond effectively to local workforce demands, which is the basis for my opposition.*

**State's Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 and 4 above.

**Commenter 35b "Private Citizen" 5/5/2026 Section Reference- Executive Summary - Pgs. 4-6**

*The plan describes a "streamlined approach" and a "cohesive statewide strategy" as key goals of the proposed changes. While efficiency is important, this language reflects a centralized model that prioritizes uniformity over local responsiveness. Workforce needs are not uniform across the state, and a centralized approach risks creating distance between decision-makers and the communities they serve.*

**State's Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 and 4 above.

**Commenter 35c "Private Citizen" 5/5/2026 Section Reference-Executive Summary -Pgs. 4-6**

*The plan suggests the State Board would assume roles and responsibilities currently carried out by local workforce boards. This concentration of authority at the state level diminishes the role of local entities that directly engage with employers, training providers, and jobseekers. This reduces responsiveness and weakens the system's effectiveness at addressing real-time workforce needs.*

**State's Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 and 4 above.

**Commenter 35d "Private Citizen" 5/5/2026 Section Reference-Executive Summary -Pgs. 4-6**

*The plan suggests a "bold restructuring of governance, service delivery, and business engagement." This indicates that the proposed changes are not minor adjustments but a significant overhaul of the current system. Changes of this magnitude require careful consideration, transparency, and clear justification, particularly when they may reduce local input and control.*

**State's Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 and 4 above.

**Commenter 35e "Private Citizen" 5/5/2026 Section Reference-Executive Summary- Pgs. 4-6**

*The plan does not clearly define how local input, employer engagement, or community-specific decision-making will be preserved under this structure. This lack of clarity raises concerns about accountability and effectiveness.*

**State’s Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 and 4 above.

**Commenter 35f “Private Citizen” 5/5/2026 Additional Comments:**

*Workforce systems function best when decisions are made at the level closest to the communities being served. Local providers have spent years navigating constraints that limited flexibility and created unnecessary barriers to effectively serving individuals seeking training and employment.*

*It is difficult to overlook that some of these same barriers are now being addressed only within the context of a broader effort to centralize authority. Local programs have consistently raised these challenges, worked within them, and still delivered results despite them.*

*Addressing those barriers is necessary—but doing so in a way that removes local control raises serious concerns. The solution to longstanding challenges should not be to replace the local systems that have been working to overcome them, but to support and strengthen them.*

*If the goal is truly improved outcomes, then removing barriers should benefit the communities and providers who have been doing the work—not come at the expense of their role in the system.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 and 4 above.

**Commenter 36 “Other” 5/5/2026 Section Reference-(Waiver 1)- Page 201**

*FARCO strongly opposes the transition to a state-administered WIOA Title I-B system. Our experience has shown that locally driven workforce initiatives are far more effective in identifying and addressing regional workforce challenges. The staff of the North Central Local Workforce Board are members of the very communities they support, giving them valuable firsthand insight that enhances their ability to effectively meet local needs. Please reject the consolidation waiver.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 and 4 above.

**Commenter 37a “Private Citizen” 5/5/2026 Section Reference-Title 1 Adult Program -Pgs. 201-202**

*The plan lists TEGL 05-25 as the basis for Waiver #1 through Waiver #7. None of these waiver flexibilities were extended to local boards before the decision to dissolve them was made. It's my opinion that the local boards should have been extended this opportunity before the decision was made.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, 4, & 19 above.

**Commenter 37b “Private Citizen” 5/5/2026 Section Reference-Other -Pages 124-125**

*The plan reports that for PY2024:*

*4 of 10 local areas did not achieve 90% of negotiated rates for Dislocated Worker*

*3 of 10 did not achieve 90% of negotiated rates for Youth*

*Individual indicators for Credential Attainment, Median Earnings, and Measurable Skills Gains were missed by multiple areas*

*The performance targets set for the new state-run model (Page 203, Waiver #1) remain just as demanding: Adult Employment Rate (Q2) 72.9%, Credential Rate 73%, Measurable Skills Gains 66.3%. These metrics do not account for the relationship-building, stabilization, and intensive case management that clients with multiple barriers to employment require before they can successfully enter and sustain employment. Punishing local programs for serving the hardest cases creates a structural incentive to avoid enrolling them.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, 4, & 19 above. Regarding performance metrics, performance goals are negotiated with each local area every two years in the same manner that the state negotiates performance goals with the U.S. Department of Labor. One factor of local negotiation is the statistical analysis conducted for that particular local workforce development area, which takes into account variables such as the economic condition of the area. The local negotiations also consider the average number of barriers recorded for the participants served in order to account for the harder to serve populations.

**Commenter 37c “Private Citizen” 5/5/2026 Section Reference- Other –Pages 208-211**

*The state is also seeking a waiver to eliminate the requirement for at least one physical comprehensive American Job Center in each local workforce area, replacing them with virtual platforms, mobile units, and affiliate partner sites. The plan acknowledges that "transportation remains a barrier" (Page 60, economic analysis) and that rural areas face significant access challenges. These are where the local rural Arkansas residents will fall through the cracks. Many cannot access these services (as has been shown by challenges with the unemployment system). These outcomes will be similar. If the process is too hard, many of the citizens simply will not participate, increasing crime and unemployment.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, 4, & 19 above. Regarding performance metrics, performance goals are negotiated with each local area every two years in the same manner that the state negotiates performance goals with the U.S. Department of Labor. One factor of local negotiation is the statistical analysis conducted for that particular local workforce development area, which takes into account variables such as the economic condition of the area. The local negotiations also consider the average number of barriers recorded for the participants served in order to account for the harder to serve populations.

**Commenter 38 “Private Citizen” 5/5/2026 Section Reference-Executive Summary- Pages 4-6**

*This plan suggests that the State board would take on the roles and responsibilities the local workforce boards are currently overseeing. Having this type of authority at the state level would diminish the role of local entities who directly engage with employers, job seekers, trainers, and more. Workforce needs are not uniform across the state, and a centralized approach will decrease responsiveness from decision-makers to the communities that need service. Changes of this nature need careful consideration, justification, local input, and intentional care/development.*

**State’s Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2, 4, & 19 above.

**Commenter 39a “State Workforce Agency Member” 5/6/2026 Section Reference-Section A-2 State Rehabilitation Council Table Pages 283-284**

*ARS adjusted the entries in the table to reflect that there are now two vacant positions reported as filled when the plan was developed. The Business, Industry, and Labor position reported to expire 2/26 is vacant as well as the Disability Advocacy Group position.*

**State’s Response: Arkansas Workforce Connections- Arkansas Rehabilitation Services**

ARS has made the corrections in the Title IV-Vocational Rehabilitation General section of the State Plan.

**Commenter 39b “State Workforce Agency Member” 5/6/2026 Section Reference-A3-Page 284**

*ARS revised the following paragraph to reflect the current composition:*

*Securing Governor appointments/reappointments remains a major issue for the SRC. At present the*

*Council continues to function outside federal requirements with only three members. Two members' appointments expired in February 2026, and one appointment was made during this reporting period. Efforts to secure needed appointments/reappointments by both SRC members and ARS have failed. ARS and the SRC have requested assistance from both the Director of Workforce Connections (its DSA) and the Office of the Secretary of the Arkansas Department of Commerce within which the agency resides.*

**State's Response: Arkansas Workforce Connections-Arkansas Rehabilitation Services**

ARS has made the corrections in the Title IV-Vocational Rehabilitation General section of the State Plan.

**Commenter 39c "State Workforce Agency Member" 5/6/2026 Section Reference-Section B-Page 285**

*ARS corrected the following sentence to read the University of Arkansas at Fayetteville instead of the University of Arkansas at Little Rock: In 2024, ARS, in agreement with the State Rehabilitation Council, contracted the University of Arkansas at Fayetteville to conduct the most recent Arkansas Comprehensive Statewide Needs Assessment.*

**State's Response: Arkansas Workforce Connections-Arkansas Rehabilitation Services**

ARS has made the corrections in the Title IV-Vocational Rehabilitation General section of the State Plan.

**Commenter 39d "State Workforce Agency Member" 5/6/2026 Section Reference-Section C-Goals, Priorities, & Strategies: Goal 5, Priority 1, & Strategy 11**

*ARS corrected the Strategy to reflect a change for the VRTAC agency that dropped "for Quality Management" in its name: Strategy 11: Request technical assistance support from the Vocational Rehabilitation Technical Assistance Center (VRTAC) on supported employment and extended services.*

**State's Response: Arkansas Workforce Connections-Arkansas Rehabilitation Services**

ARS has made the corrections in the Title IV-Vocational Rehabilitation General section of the State Plan.

**Commenter 39e "State Workforce Agency Member" 5/6/2026 Section Reference-Section K-Page 307**

*Revised the following paragraph to include the word counselor in the second sentence: Program staff include a counselor, SAW/RTW coordinator and an administrative assistant.*

**State's Response: Arkansas Workforce Connections-Arkansas Rehabilitation Services**

ARS has made the corrections in the Title IV-Vocational Rehabilitation General section of the State Plan.

**Commenter 39f "State Workforce Agency Member" 5/6/2026-Additional Comments**

*ARS revised the following sections found on pages 337-339 to accommodate the new reporting format that only required that sections of the plan be indicated. General Education Provision Act Section 427 Assurance - Vocational Rehabilitation Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to applicants for grant awards under this program. Section B – Comprehensive Statewide Needs Assessment – Sections 1A, 1B, 1C, and 1D. Section C – Goals, Priorities, and Strategies – Goals 2, 3, 4. Section I – Comprehensive System of Personnel Development. General Education Provision Act Section 427 Assurance - Supported Employment - Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to applicants for grant awards under this program. Compliance can be found on the following page(s) of the application: Section B – Comprehensive Statewide Needs Assessment – Sections 1A, 1C, and 1D. Section C – Goals, Priorities, and Strategies – Goals 1 and 5. Section E – Supported Employment Services. Section I - Section I: Comprehensive System of Personnel Development.*

**State's Response: Arkansas Workforce Connections- Arkansas Rehabilitation Services**

ARS has made the corrections in the Title IV-Vocational Rehabilitation General section of the State Plan.

**Commenter 40 “Other” 5/6/2026 Section Reference-(Waiver 1) Page 201**

*PECO opposes consolidating WIOA Title I-B into a state-administered system, as access to locally administered workforce programs has been a valuable resource for employee development. Our staff have used WIOA-funded tuition assistance for training and skill development when eligible, helping us strengthen our workforce in a targeted, practical way. Eliminating the North Central Local Workforce Board would reduce the level of comfort participants who are in need of services currently experience.*

**State’s Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 and 4 above.

**Commenter 41a “Other” 5/6/2026 Section Reference-Other-Pages 4-5**

*pages 4 and 5, it talks about going from 10 local offices to 1 central office. what happens to those people working at the 10 local offices? what happens to the potential employees that rely on the computer labs in those local offices to look for employment opportunities? and how does this help organizations like mine, the hot springs housing authority, that rely on the services provided by local offices to help my program participants to find employment? our governor talks an awful lot about how bad government overreach is, but this is a prime example of said overreach.*

**State’s Response: Arkansas Workforce Connections- Office of Employment and Training**

Please see responses to comments #2 and 4 above. In addition, services will continue to be provided throughout the state at local workforce centers, not from "1 central office". Even though the framework and governance will be centralized, the service delivery will remain local.

**Commenter 41b “Other” 5/6/2026 Section Reference- Other- Pages 4-5**

*using words like consolidating and stream lining mean the same as cutting the budget. Not only does this take jobs away from arkansans, this takes resources away from local communities. How long before these jobs are outsourced to call centers out of state, or out of the country? creating the AIC as a single point of contact does nothing but make it harder for employers to contact someone. S&S plumbing in Hot Springs, can call the local workforce office, get an answer from a local person, and find possible employees in minutes. Possibly have some one working the next day. there is no way, one central office located....where ever can do the same thing. What resources are we using to make this one single contact? what local information will they have and how often will it be updated?*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 and 4 above. In addition, services will continue to be provided throughout the state at local workforce centers, not from “1 central office.” Even though the framework and governance will be centralized, the service delivery will remain local.

**Commenter 42a “Other” 5/6/2026 Section Reference-Other**

*The proposed reduction of WIOA workforce positions will have a devastating impact on Southeast Arkansas, especially in rural communities where workforce resources are already limited. Many of the individuals we serve do not have access to transportation, technology, or alternative support systems. Removing experienced front line staff will not simply “restructure” services, it will reduce access to employment opportunities, training programs, and economic stability for entire communities.*

*Decisions like these may appear administrative on paper, but in Southeast Arkansas they translate directly into lost jobs, reduced outreach, weakened local workforce development, and fewer opportunities for families already struggling to stay afloat. Rural Arkansas cannot afford to lose programs and professionals that actively connect people to work, education, and self-sufficiency.*

*I urge state leadership to fully consider the long-term economic and community consequences these reductions will create across Southeast Arkansas.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 and 4 above.

**Commenter 42b “Other” 5/6/2026 Section Reference-Other-Additional Comments**

*WIOA programs play a critical role in strengthening Arkansas’s workforce by connecting individuals to employment opportunities, occupational training, educational resources, and supportive services that directly contribute to economic growth and workforce readiness. The work performed by front line workforce professionals is essential to ensuring these services remain accessible, effective, and community-centered.*

*Through direct engagement with job seekers, employers, youth participants, displaced workers, and underserved populations, WIOA staff provide guidance and workforce development support that helps individuals achieve long-term employment and self-sufficiency. These efforts also support local businesses by helping address workforce shortages and preparing qualified candidates for in-demand industries.*

*Any significant reduction in staffing or community outreach capacity would likely impact service delivery across Southeast Arkansas, particularly in rural and economically vulnerable communities where workforce resources may already be limited. Maintaining experienced workforce personnel is vital to preserving continuity, accessibility, and program effectiveness for the citizens who rely on these services.*

*In addition to the impact on workforce participants and local employers, these proposed changes create uncertainty for dedicated public service professionals who have committed themselves to supporting workforce development initiatives throughout the state.*

*I respectfully encourage state leadership to carefully evaluate the long-term implications these decisions may have on workforce accessibility, economic development efforts, and community support systems. Continued investment in workforce professionals and regional outreach remains essential to sustaining a strong and competitive workforce across Arkansas.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2 and 4 above.

**Week 5**

May 10, 2026-May 17, 2026

**Commenter 43a “Other” 5/11/2026 Section Reference-Title II Dislocated Worker-Page Number-None listed**

*If the current system is not broken, then why are we changing it? If your changes happen, do you know how many jobs will be lost? If the State takes over the Workforce System, the State will be creating many dislocated workers.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training:**

Please see responses to comments #2, #4, and #19 above. In addition, the waiver proposal is anticipated to reduce administrative and operational costs by \$6M that will be invested directly back into the communities statewide.

**Commenter 43b “Other” 5/11/2026 Section Reference-Title II Dislocated Worker- Page Number-None listed**

What is wrong with how the program is currently being run? Why is the State looking for a way to take jobs away? Why is the State wanting to take food from tables, clothes off our backs, funds out of our pockets, placing our families in poverty?

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above. In addition, the waiver proposal is anticipated to reduce administrative and operational costs by \$6M that will be invested directly back into the communities statewide.

**Commenter 43c “Other” 5/11/2026 Section Reference-N/A-Page Number N/A**

*Repeat of comment B.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above. In addition, the waiver proposal is anticipated to reduce administrative and operational costs by \$6M that will be invested directly back into the communities statewide.

**Commenter 43d “Other” 5/11/2026 Section Reference-N/A-Page Number N/A**

*Repeat of comment B.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above. In addition, the waiver proposal is anticipated to reduce administrative and operational costs by \$6M that will be invested directly back into the communities statewide.

**Commenter 43e “Other” 5/11/2026 Section Reference-N/A-Page Number N/A**

*Repeat of comment B.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above. In addition, the waiver proposal is anticipated to reduce administrative and operational costs by \$6M that will be invested directly back into the communities statewide.

**Comment 43f “Other” 5/11/2026 Section Reference-N/A/ Page Number N/A-Additional Comments**

*Repeat of comment B.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above. In addition, the waiver proposal is anticipated to reduce administrative and operational costs by \$6M that will be invested directly back into the communities statewide.

**Commenter 46a “LWDB Director” 5/11/2026 Section Reference-(Waiver 1) Page 201**

*Items to consider:*

- 1) *Local Business Representation and Industry Responsiveness: The NEAWDB is composed of 51% business-sector representatives with senior decision-making and policy-making authority, ensuring that decisions reflect the specific needs of employers and the community in Northeast Arkansas. The NEAWDB developed the mantra, “Developing a workforce that fulfills the needs of Northeast Arkansas Employers.” Some of the major industries represented on the board are NicePak, Ritter Communications, Hytrol, and St. Bernards Healthcare. In comparison, a State Board, by design, must focus on statewide industry trends rather than the needs of individual employers or regional sectors. This shift would weaken or silence the local business voice that is vital to WIOA’s intent.*
- 2) *Ability to Respond Quickly to Local Conditions: Because the NEAWDB is not required to balance statewide priorities, it can adapt more rapidly to emerging workforce needs, closures, economic shifts, and employer demands within the region. This ability is critical for maintaining a competitive and responsive workforce system.*
- 3) *Local Authority Over Training Decisions: The NEAWDB has the ability to approve training programs that directly align with local employer needs, independent of state-level preferences. The board has implemented an Eligible Training Provider (ETP) policy that ensures compliance with Federal, State, and Local requirements while minimizing costs. This local oversight ensures training investments remain relevant and efficient.*
- 4) *Regular, Data-Driven Oversight and Accountability: The NEAWDB chair and NEACEO chair receive weekly updates from EAPDD regarding job fairs, expenditures, monitoring activities, and federal and state issuances. This level of ongoing communication ensures that the board remains closely connected to local workforce activity and can respond proactively.*
- 5) *Conclusion: While the State may receive some of this information, it would not be provided or acted upon with the same frequency, depth, or local context that the NEAWDB currently provides. The NEAWDB’s structure and operations are uniquely positioned to support employer engagement, local decision-making, and rapid responsiveness. Replacing these functions with a centralized State Board would risk diminishing the effectiveness and relevance of workforce services in Northeast Arkansas. Another way to increase communication and coordination between the Local WDBs and the State WDB is to have the chair of each Local WDB serve on the State WDB, ensuring regular dialogue, shared decision-making and consistent feedback loops.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to #2, #4, and #19 above.

**Commenter 46b “LWDB Director” 5/11/2026 Section Reference-Other Page. 201**

*Fiscal Liability of the Northeast Arkansas Chief Elected Officials (NEACEOs) – The waiver does not address a critical issue: it does not absolve the NEACEOs of fiscal liability nor transfer that liability to the State, even though the State is proposing to assume full authority as a single State Workforce Development Board.*

*If the State intends to centralize governance, decision-making, and operational control, then the State must also assume the corresponding fiscal responsibility. Local Chief Elected Officials should not remain financially liable for decisions they no longer have the authority to influence or oversee.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to #2, #4, and #19 above. Fiscal liability will be transitioned from the local chief elected officials to the grant recipient at the state level.

**Commenter 46c “LWDB Director” 5/11/2026 Section Reference (Waiver 2) Page 205**

*Reference Waiver #2 – Flexibility to Reallocate Funds Across Local Workforce Areas*

*The waiver states, “Redistribution of recaptured funds to workforce areas based on factors established to ensure that funds are redistributed to workforce areas with the greatest need.”*

*If the State proposes to operate as a single State Workforce Development Board, it raises an underlying concern: Why should a local workforce area lose funding due to shortcomings or poor decisions made at the State level in serving that area?*

*Under a centralized structure, the State, not local boards, would be responsible for strategic direction, oversight, and operational performance. Therefore, any underperformance leading to recapture should be attributed to State-level decisions, not to the local area or its community.*

*How will the State ensure that local workforce delivery areas are not penalized for decisions they no longer have the authority to govern?*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to #2, #4, and #19 above. The state understands this concern. State Workforce Development Board oversight will ensure local areas are not adversely affected due to underperformance by the state service provider.

**Commenter 46d “LWDB Director” 5/11/2026 Section Reference (Waiver 3) Page 208**

*Reference Waiver #3 – Network of Affiliate Sites in lieu of Comprehensive Centers*

*The waiver states, “This waiver would allow Arkansas to leverage virtual and remote services as well as utilize a robust network of affiliated sites that leverage strategic co-location with partners to minimize infrastructure costs while maximizing reach.”*

*The waiver also states, “This waiver does not eliminate access to comprehensive services.”*

*The two above statements are counterintuitive. The first statement references the removal of established brick-and-mortar centers, and the second statement references not eliminating access to comprehensive services. In practice, these two conditions cannot coexist without a significant reduction in service quality and accessibility.*

*Virtual and remote services cannot replace the full functionality of in-person interactions. Individuals seeking workforce services often face barriers such as limited digital literacy, unreliable internet access, or difficulty navigating government systems. For many clients, particularly those with low income, limited education, disabilities, or language barriers, a computer terminal or remote option is not sufficient to understand, access, or complete the steps*

*required to receive meaningful services.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**  
Please see responses to #2, #4, and #19 above.

**Commenter 46 “Chief Local Elected Official” 5/11/2026 Section Reference-Titles I, II, III and IV-Page None Listed**

*I am writing in my capacity as County Judge for Chicot County, Arkansas, to express concern regarding the State’s proposed changes to local workforce governance under the Workforce Innovation and Opportunity Act (WIOA).*

**Commenter 47 “Chief Local Elected Official” 5/11/2026 Section Reference-Titles I, II, III and IV-Page None Listed**

*I am writing in my capacity as County Judge for Chicot County, Arkansas, to express concern regarding the State’s proposed changes to local workforce governance under the Workforce Innovation and Opportunity Act (WIOA). Based on publicly discussed materials and recent board actions, the State appears to be moving toward a more centralized structure that could reduce or absorb the role of local workforce development boards.*

*For communities like ours in Chicot County, this is not an abstract governance issue. We are a rural Delta county with unique economic and workforce characteristics shaped by agriculture, aquaculture, small manufacturing, and public-sector employment. Our local workforce system works best when decisions are informed by local employers, local elected officials, local training providers, and the real-life barriers faced by our residents. A statewide structure may appear efficient, but it risks creating distance between policy decisions and the people those decisions directly affect*

*Chicot County faces distinct challenges that require localized solutions. Our workforce is heavily influenced by seasonal agricultural employment, catfish farming, and small-scale industry. Transportation remains a major barrier, with many residents lacking reliable access to job centers or training providers outside Lake Village and surrounding communities. Broadband access, while improving, is still inconsistent in rural areas, limiting participation in online training and workforce programs. These realities require flexibility and responsiveness that only a strong local governance structure can provide.*

*Local workforce boards play a critical role by aligning training opportunities with the needs of employers in our area, supporting small businesses, and helping residents access employment pathways that are realistic given our geography and infrastructure. They also ensure that workforce investments are tied to local economic development priorities, including agricultural innovation,*

*logistics along the Mississippi River corridor, and workforce retention in a region that continues to face population decline.*

*I am particularly concerned that the proposed changes could weaken the role of local elected officials and diminish the voice of local businesses and community leadership. WIOA was designed with meaningful local participation at its core. Any effort to significantly alter that structure should be undertaken with full transparency, clear legal justification, and thorough consultation with affected communities.*

*I respectfully ask the State to clearly define the proposed changes, the legal authority under which they would be implemented, and how they would impact local workforce development boards, chief elected officials, employer engagement, one-stop center oversight, and service delivery in regions like ours. I also urge the State not to move forward with implementation until all required public comment, stakeholder consultation, and federal review processes are fully completed.*

*Most importantly, I urge consideration of the real-world impact on counties like Chicot. Workforce decisions here directly affect agricultural producers, local businesses, and residents who already face significant barriers to employment and training access. A governance structure that reduces local input risks weakening the effectiveness of the system and limiting opportunity for those who need it most.*

*Local voice is not an obstacle to workforce development—it is essential to its success. I respectfully urge the Arkansas Workforce Development Board and State leadership to preserve meaningful local governance and avoid changes that would diminish local authority in favor of centralization.*

*Thank you for the opportunity to submit this comment.*

*Sincerely,*

*Tom Mosley  
Chicot County Judge  
Chicot County, Arkansas*

**State’s Response: Arkansas Workforce Connections: Office of Employment and Training**

Please see responses to #2, #4, and #19 above.

**Commenter 48a “State Workforce Agency Member” 5/11/2026 Section Reference- Other- Page Number-None Listed**

*Our departments heads should not be affected by the State take-over, given the fact that we know what our areas needs and have been meeting those needs for our areas. We should be able to remain in our designated departments and meet the consumer needs as usual.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to #2, #4, and #19 above.

**Commenter 48b “State Workforce Agency Member” 5/11/2026 Section Reference-Other- Page Number- None Listed**

Repeat of comment A.

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to #2, #4, and #19 above.

**Commenter 48c “State Workforce Agency Member” 5/11/2026 Section Reference-Other Page Number-None Listed-Additional Comments**

*WIOA programs play a critical role in strengthening Arkansas's workforce by connecting individuals to employment opportunities, occupational training, educational resources, and supportive services that directly contribute to economic growth and workforce readiness. The work performed by frontline workforce professionals is essential to ensuring these services remain accessible, effective, and community-centered.*

*Through direct engagement with job seekers, employers, youth participants, displaced workers, and underserved populations, WIOA staff provide guidance and workforce development support that helps individuals achieve long-term employment and self-sufficiency. These efforts also support local businesses by helping address workforce shortages and preparing qualified candidates for in-demand industries.*

*Any significant reduction in staffing or community outreach capacity would likely impact service delivery across Southeast Arkansas, particularly in rural and economically vulnerable communities where workforce resources may already be limited. Maintaining experienced workforce personnel is vital to preserving continuity, accessibility, and program effectiveness for the citizens who rely on these services.*

*In addition to the impact on workforce participants and local employers, these proposed changes create uncertainty for dedicated public service professionals who have committed themselves to supporting workforce development initiatives throughout the state.*

*I respectfully encourage state leadership to carefully evaluate the long-term implications these decisions may have on workforce accessibility, economic development efforts, and community support systems. Continued investment in workforce professionals and regional outreach remains essential to sustaining a strong and competitive workforce across Arkansas.*

**State's Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above.

**Commenter 49 "LWDB Member" 5/12/2026 Section Reference-Other- Page Number 86**

*While the plan frames this proposal as a modernization and efficiency effort, the elimination of local boards represents a fundamental departure from the intent of the Workforce Innovation and Opportunity Act (WIOA), which was explicitly designed to ensure that workforce systems respond to local economic conditions, employer needs, and community partnerships.*

*Arkansas itself acknowledges throughout the draft plan that workforce challenges vary significantly across regions. Rural communities, in particular, face distinct barriers related to transportation, broadband access, childcare availability, employer density, and access to wraparound services. Local workforce boards exist to address those differences through place-based governance, locally informed decision-making, and long-standing partnerships with employers, education providers, and community organizations. The proposed centralization raises several critical concerns:*

*Loss of local expertise and accountability. Eliminating locally appointed boards removes decision-making authority from leaders who understand regional labor markets and replaces it with centralized control that may not reflect local realities.*

*Reduced effectiveness in rural and underserved areas. Reliance on virtual service delivery and mobile caseworkers may reduce operational overhead, but it risks undermining the high-touch, relationship-based service delivery that successful outcomes in rural communities require.*

*Weakened employer and partner engagement. Local boards play a key convening role between employers, workforce partners, adult education, colleges, and economic development entities. Centralized business engagement structures are unlikely to replicate the trust and responsiveness built through local presence.*

*Insufficient justification and lack of transparent analysis. The plan does not provide a clear, data-driven impact analysis demonstrating how long-term employment outcomes, participant success, or employer satisfaction will be maintained or improved under the proposed model. Additionally, changes to performance metrics during the transition make meaningful comparison between the current and proposed systems difficult.*

*Risk of prioritizing administrative efficiency over participant outcomes. Workforce systems should be measured by access, effectiveness, and employment success—not solely by reductions in administrative structure.*

*This proposal represents one of the most significant structural changes to Arkansas' workforce system since the implementation of WIOA. Given the magnitude of the change and the potential impact on jobseekers, employers, and communities across the state, especially in rural areas, this plan should not be approved without a transparent, public-facing analysis that clearly demonstrates it will not result in diminished services or weakened outcomes.*

*I respectfully urge the State Workforce Development Board and the Department of Workforce Services to pause this proposed restructuring, meaningfully engage stakeholders at the local level, and provide evidence-based justification that aligns with both WIOA's intent and the diverse needs of Arkansas' communities.*

*Thank you for the opportunity to submit comments.*

*Respectfully,*

*Jason Patience  
NWAEDD Board Member  
Plant Manager for Local Manufacturer  
Harrison, Arkansas*

**State's Response: Arkansas Workforce Connections-Office of Employment and Training**  
Please see responses to comments #2, #4, and #19 above.

**Commenter 50 "Other" 5/12/2026 Section Reference-Title 1 Adult-Page Number-None Listed**

*Localized WIOA programming matters due to geographic isolation, diverse economies, and diverse populations. In Newton Co our challenges and barriers are outliers compared to state-wide statistics.*

**State's Response: Arkansas Workforce Connections-Office of Employment and Training**  
Please see responses to comments #2, #4, and #19 above.

**Commenter 51 “Private Citizen” 5/13/2026 Section Reference-Career & Technical Education (CTE) Page Number 8**

*Attending School*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**  
**N/A**

**Commenter 52 “Partner Agency” 5/14/2026 Section Reference (Waiver 1) Page Number 201**

*Waiver #1*

*Title: State Board Acts as Local Board*

*This comment is submitted in opposition to the waiver proposal contained within the Arkansas WIOA Combined State Plan that seeks to remove or replace the existing local workforce development board structure.*

*The proposed approach does not appear to align with the purpose established under the Workforce Innovation and Opportunity Act (WIOA). Federal law clearly identifies local workforce development boards as an essential part of the workforce system, assigning them specific duties, membership requirements, and oversight responsibilities within each designated local area. These boards were established to provide more than advisory support; they serve as a key mechanism for ensuring local oversight, employer participation, and workforce strategies that reflect regional economic conditions and community needs.*

*Although WIOA allows for certain administrative waivers, those waivers are intended to support operational flexibility rather than eliminate statutory governance requirements established by Congress. Replacing multiple local workforce boards with a centralized statewide structure would significantly change the organizational design of the workforce system beyond what appears contemplated under waiver authority.*

*Local workforce development boards are vital to maintain community engagement, fostering business partnerships, and ensuring services remain responsive to the unique workforce and economic priorities of each region in Arkansas as well as to make sure that the hard to reach and barrier populations are being served. Removing these local entities would diminish local, regional representation and could negatively impact the connection between workforce programming and local labor market demands. Such a shift would be contrary to WIOA’s emphasis on locally informed and regionally driven workforce development efforts.*

*Accordingly, careful consideration is respectfully requested to deny any waiver application or implementation strategy that would abolish local workforce development boards or transfer their legally defined responsibilities entirely to the State Board.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

*Please see responses to comments #2, #4, and #19 above.*

**Week 6**

May 18, 2026

**Commenter 53 “Other” 5/18/2026 Section Reference (Waiver 1) Page Number 201**

*Citizens Bank in Batesville is opposed to converting WIOA Title I-B into a state-managed system, as we believe workforce development is most effective when guided by local insight and*

*leadership. Regional stakeholders possess a deeper understanding of the labor market, industry demands, and community challenges, allowing for more strategic and relevant program implementation. Centralizing control at the state level may limit flexibility, reduce stakeholder engagement, and hinder the ability to address workforce needs in a timely and practical manner. Maintaining a locally driven framework is critical to supporting sustainable economic growth and workforce success.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above.

**Commenter 54a “LWDB Director” 5/18/2026 Section Reference-Other Page Number 4**

*Title IB - A, DLW, and Y - Loss of local decision-making – The plan removes local workforce boards and shifts all decision-making to the state. This takes authority away from local communities that understand their workforce needs best. This comment is submitted on behalf of and with approval from the Southwest Arkansas Workforce Development Board.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above.

**Commenter 54b “LWDB Director” 5/18/2026 Section Reference-Other Page Number 4**

*Title IB - A, DLW, Y - Potential conflict with WIOA intent – WIOA was designed to include local workforce boards. Eliminating them appears inconsistent with WIOA’s emphasis on local workforce leadership and employer-driven decision-making. This comment is submitted on behalf of and with approval from the Southwest Arkansas Workforce Development Board.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above.

**Commenter 54c “LWDB Director” 5/18/2026 Section Reference-Other Page Numbers 4-5**

*Other - Title IB - A, DLW, Y - Impact on local jobs and service capacity – The plan focuses on reducing administrative costs, which likely means fewer local staff. This will reduce the ability to serve job seekers and employers at the local level. This comment is submitted on behalf of and with approval from the Southwest Arkansas Workforce Development Board.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above.

**Commenter 54d “LWDB Director” 5/18/2026 Section Reference-Other Page Number 6**

*Other - Title IB - A, DLW, Y - Unclear distribution of funding across regions – The plan states that funds will be redirected, but does not explain how funding will be distributed across regions. This creates concern that rural areas could lose resources. This comment is submitted on behalf of and with approval from the Southwest Arkansas Workforce Development Board.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above.

WIOA Title I funds flow from the U.S. Department of Labor to each state through federal formulas, and states must then allocate those funds to local workforce development areas using the factors defined in WIOA §§128 and 133. For Adult and Youth programs, the formula is based on unemployment rates, excess unemployment, and the number of economically disadvantaged

individuals. For the Dislocated Worker program, states receive funds based on unemployment concentrations, long-term unemployment, and declining industries, and then distribute them to local areas using the state-established formula that includes factors such as unemployment levels, plant closures/layoffs, and labor market conditions. Once the state completes its allocation, those dollars are designated to each local area for the full period of availability.

WIOA requires that funds allocated to a local workforce development area remain in that area and cannot be used elsewhere unless the state formally recaptures and reallocates them under federal rules. Recapture generally occurs when a local area fails to meet obligation thresholds, after which the state may redistribute the unused portion to other local areas that have demonstrated need and full utilization. This ensures that funding follows local labor market conditions, preserves local control, and maintains accountability while still allowing states to redirect under-utilized funds when necessary.

**Commenter 54e “LWDB Director” 5/18/2026 Section Reference- Other Page Number 31**

*Other - Title 1B - A, DLW, Y - Focus on high-growth areas may shift resources – The plan shows that most job growth is expected in Northwest and Central Arkansas, raising concern that funding and attention will shift away from rural areas. This comment is submitted on behalf of and with approval from the Southwest Arkansas Workforce Development Board.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, #19 and #54d above.

**Commenter 55a “LWDB Director” 5/18/2026 Section Reference-Other Page Numbers 31 & 36**

*Other - Title 1B - A, DLW, Y - Rural areas will be hit the hardest – The plan shows that Southwest Arkansas and other regions are already losing jobs and population. Removing local leadership makes it harder to respond to those challenges. This comment is submitted on behalf of and with approval from the Southwest Arkansas Workforce Development Board.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above.

**Commenter 55b “LWDB Director” 5/18/2026 Section Reference – Other Page Numbers 31 & 36**

*Other - Title 1B - A, DLW, Y - Declining regions identified without targeted solutions – The plan clearly identifies declining regions like Southwest Arkansas but does not provide a strong, targeted strategy to address those declines. This comment is submitted on behalf of and with approval from the Southwest Arkansas Workforce Development Board.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above. Labor market information will be reviewed and assessed for every local area when strategies are developed for issues such as declining regions. Regional business councils will exist to develop strategies in their areas.

**Commenter 55c “LWDB Director” 5/18/2026 Section Reference –Other Page Number 3**

*Other - Title 1B - A, DLW, Y - Unclear impact on One-Stop Centers – The plan does not clearly explain how local workforce centers will operate under the new model, especially in rural areas.*

*This comment is submitted on behalf of and with approval from the Southwest Arkansas Workforce Development Board.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above.

**Commenter 55d “LWDB Director” 5/18/2026 Section Reference-Other Page Number 5**

*Other - Title 1B - A, DLW, Y - Not everyone can access virtual services – The plan emphasizes virtual and AI-based services. Many people in rural areas do not have reliable internet or access to technology, which could limit access to services. This comment is submitted on behalf of and with approval from the Southwest Arkansas Workforce Development Board.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above.

**Commenter 55e “LWDB Director” 5/18/2026 Section Reference –Other Page Number 5**

*Other - Title 1B - A, DLW, Y - Local employer relationships could be weakened – The plan creates a centralized business engagement model. This could weaken the strong relationships local staff have built with employers over time. This comment is submitted on behalf of and with approval from the Southwest Arkansas Workforce Development Board.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above.

**Commenter 56 “LWDB Director” 5/18/2026 Section Reference (Waiver 1) Page Number 201**

*Waiver #1-As a Workforce Director responsible for administering workforce services within Southeast Arkansas, I respectfully submit this public comment in opposition to Waiver #1, “State Board Acts as Local Board,” included in the proposed Arkansas WIOA Combined State Plan Modification for Program Years 2026–2027.*

*While I support efforts to improve efficiency, strengthen coordination, and modernize Arkansas’ workforce system, I have significant concerns regarding the proposal to transition to a single statewide planning area and centralize local workforce board functions under the Arkansas Workforce Development Board.*

*Local workforce areas were established under WIOA to ensure workforce services remain responsive to the unique economic, demographic, and employment needs of individual regions. Southeast Arkansas faces workforce challenges that differ greatly from other parts of the state, including persistent poverty, transportation barriers, rural service delivery limitations, declining population, and limited access to training opportunities. These challenges require localized decision-making and direct engagement with employers, training providers, community organizations, and local governments that understand the needs of the region.*

*From an operational standpoint, local workforce boards and workforce staff have developed strong relationships and partnerships that support service delivery, employer engagement, participant recruitment, and regional workforce planning. These partnerships have been built over many years and are critical to the effectiveness of workforce programs in rural communities.*

*The proposed waiver raises concerns regarding the loss of local governance, reduced regional flexibility, and the potential disruption of existing workforce operations. Although the proposal*

references regional business councils and continued stakeholder input, advisory participation is not the same as maintaining local oversight, local accountability, and local decision-making authority.

I am also concerned about the impact this proposal may have on workforce staff and operational continuity across local areas. The waiver language references phased closeout activities for local boards and restructuring of statewide operations. Many workforce professionals throughout Arkansas possess valuable institutional knowledge, established community relationships, and experience navigating local workforce barriers that cannot easily be replicated within a centralized structure.

Additionally, the proposed waiver does not provide sufficient detail regarding:

How local stakeholder input will be preserved;  
How funding decisions will be made at the regional level;  
How rural communities will maintain equitable access to workforce services;  
How operational transitions will occur without disrupting participant services;  
How accountability and performance oversight will be managed during implementation.

As a Workforce Director, I strongly believe workforce development is most effective when local employers, educators, elected officials, and workforce leaders maintain an active role in shaping regional workforce strategies and investments. A statewide approach may improve administrative consistency in some areas, but it should not come at the expense of local responsiveness, community partnerships, and regional representation.

I respectfully urge the Arkansas Workforce Development Board and the U.S. Department of Labor to carefully reconsider Waiver #1 and allow for additional stakeholder engagement, transparency, and discussion before moving forward with a restructuring that could significantly impact workforce service delivery throughout Arkansas, particularly in rural regions such as Southeast Arkansas.

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above.

**Commenter 57a “Other” 5/18/2026 Section Reference (Waiver 1) Page 201**

I’m submitting this additional comment because the State’s responses to Waiver 1 raise serious concerns about the proposal and the comment period process.

The comments show more than general opposition. They come from CEOs, local officials, local boards, employers, schools, healthcare providers, banks, chambers, community partners, and citizens. Many are tied directly to service delivery, employer needs, rural access, broadband, transportation, youth programs, training, and local authority.

My main concern is the State’s repeated use of “Please see responses to comments #2 and #4 above.” Similar comments can be grouped, but they still have to be answered seriously. Batesville’s concern as a regional economic hub isn’t the same as Saline County’s access concern after the Benton Workforce Center closed in 2023. Independence County’s broadband issue isn’t the same as Jackson County’s labor force concern, Southside School District’s youth work-based learning concern, or employer concerns from White River Health, Bad Boy Mowers, 1st Community Bank, PECO, and Clearway Credit Union. These comments point in the same

*direction, but they're based on different local facts. The State doesn't answer those facts in any meaningful local way.*

*General references to virtual services, mobile units, affiliate sites, advisory groups, and reduced overhead don't explain how access, employer needs, service levels, or local authority will be protected. Future broadband funding doesn't answer what happens now where broadband is unreliable, transportation is limited, and customers need in-person help.*

*There's also a state-law issue I don't see addressed. Arkansas already has 10 local workforce areas, and Arkansas law appears to require a local workforce board in each area. If that's correct, the State needs to explain how it can absorb or replace those boards through a federal waiver alone without changing Arkansas law. Even if USDOL approved a waiver, Arkansas still has to follow its own statutes unless they're changed.*

*There's also a federal legal issue. The State relies on TEGL 05-25 for broader waiver flexibility, but TEGL 05-25 doesn't erase WIOA's limits. It points back to TEGL 08-18, which says the Secretary is statutorily prohibited from waiving provisions related to the establishment and functions of local areas and local workforce boards. USDOL's waiver guidance says the same thing.*

*Commenter 19 raised this directly by stating that federal law establishes local boards as required parts of the workforce system, with defined membership, duties, and functions in each local area. The State's response was basically to cite comments #2 and #4 and TEGL 05-25. That was an unsatisfactory response. That doesn't answer whether Waiver 1 violates federal waiver limits or whether Arkansas law must be changed before local board authority can be absorbed.*

*Advisory groups aren't local governance. Input isn't voting authority, budget authority, or real decision-making power. The State also hasn't shown how rural participants and people with barriers will be protected in each area, especially where broadband, transportation, and in-person help remain major concerns.*

*All waivers should be shelved until the State answers its constituency in a serious manner. Generic responses shouldn't be used to answer different regions with different needs as if they're the same. Before anything moves forward, the State must answer the federal and state legal questions in writing, provide a real local impact analysis, and explain how service levels and local authority will be protected in each affected area. Please act like you care about the constituency that voted the Governor into office. These are the same people you are taking decision making authority from and we don't like it!*

### **State's Response: Arkansas Workforce Connections-Office of Employment and Training**

The state is perplexed by the receipt of this comment made on 5-18-26. The public comment period officially ended on 5-18-26. All comments and state responses were not published and made publicly available until the date of AWDB special called meeting (5-21-26).

Specific concerns addressed previously in the document were referenced again in state responses. What constitutes as "meaningful" and "unacceptable" is subjective to each reader.

The state recognizes that broadband issues remain a concern for rural areas. The plan addresses several avenues for customers to access services including affiliate workforce center sites and mobile units which will be available in communities throughout the state on a rotating basis.

Approval of waivers included in this plan will initiate a process of implementation which includes a path to full compliance. This path may include necessary state legislation that aligns with flexibilities granted at the federal level.

Waivers included in this plan meet the following criteria: Under the Secretary of Labor's (Secretary) waiver authority outlined in WIOA sec. 189(i)(3)(A), the Secretary may waive certain provisions of WIOA Title I subtitles A, B, and E and provisions found in Sections 8 – 10 of the Wagner-Peyser Act. This includes waiver #1 which would permit the state board to carry out functions of local workforce development boards. The functions would not be abandoned but rather shifted to a unified governance structure representing Arkansas' ten local workforce development areas.

Rural participants and individuals with barriers to employment will have better access to services through the availability of more funding and support. Local residents will be served by staff who live, work, and lead in their communities.

**Commenter 57b “Other” 5/18/2026 Section Reference (All Waivers) Page 201**

*I'm submitting this additional comment in opposition to all proposed waivers.*

*The State's repeated use of “please see comments #2 and #4 above” creates a serious concern about whether the comment process is being used to listen or simply to complete a required step. Public comment is not supposed to be a paperwork exercise. It is supposed to give the State a chance to slow down, examine what people are saying, and adjust course when the record shows serious concerns from the communities affected.*

*That hasn't happened here. The State's responses give the impression that the conclusion came first and the public comments were handled afterward. That is especially troubling because these waivers could reshape the workforce system across Arkansas. A change of this size should not move forward on broad assurances, repeated cross-references, and promises that things will work out later.*

*This is not a partisan issue. It is a public service issue. It affects whether people can reach help, whether employers can get timely support, whether local officials retain a real role, and whether the State can replace long-standing local relationships without weakening service. People in different regions are not just asking to be heard. They are warning the State that the proposal could create harm that will not be easy to fix once local capacity is reduced or removed.*

*The risk is not limited to administration. If local access points are weakened, if trained local staff are displaced, if employer relationships are broken, or if rural residents are pushed toward services they cannot realistically use, the damage will fall on families, businesses, and communities. Once that happens, it will not be enough to say the system is more streamlined. A streamlined system that people cannot reach is not an improvement.*

*The State should not treat public concern as resistance to change. Many commenters understand the need for improvement, flexibility, and better outcomes. The objection is that the State has not shown that these waivers will protect local service, local accountability, or the people most likely to be harmed. Until the State can answer those concerns seriously, with specifics instead of generic responses, all waivers should be shelved.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to all comments above.

The state offers its assurance that the public comment process and related stakeholder engagement events and consultations were and will be conducted in an open and transparent manner. Local workforce development board staff were asked to assist in scheduling meetings with community leaders and elected officials in their areas to ensure open dialogue between all parties. Only a small number of workforce development areas expressed interest and followed through with this request.

**Commenter 58a “LWDB Director” 5/18/2026 Section Reference-Title I Adult Program Page Number 62**

*The final sentence of the paragraph following Criterion 6 states that the State intends to expand virtual services to increase capacity, particularly in rural areas. However, this strategy may not be effective in communities where reliable broadband access is limited. In the WAPDD district, approximately 21% of the population is considered broadband deficient, creating a significant barrier to accessing virtual services. This highlights the continued need for strong local workforce boards that understand the specific challenges within their communities and can ensure services remain accessible through in-person support.*

**State’s Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above.

**Commenter 58b “LWDB Director” 5/18/2026 Section Reference Title I Adult Program Page Number 801**

*Waiver #1*

*Title: State Board Acts as Local Board*

*This comment is submitted in opposition to the proposed waiver in the Arkansas WIOA Combined State Plan that seeks to eliminate or consolidate the existing local workforce development board structure.*

*The proposed approach does not appear to align with the intent or framework of the Workforce Innovation and Opportunity Act (WIOA). Under federal law, local workforce development boards are a required component of the workforce system, with clearly defined roles, responsibilities, and membership requirements within each local area. These boards serve a critical function beyond advisory input—they are foundational to ensuring local oversight, employer engagement, and service delivery that reflects regional workforce needs.*

*Although waiver authority allows for certain administrative flexibilities, it does not extend to removing core statutory requirements or restructuring governance components established by Congress. Moving from multiple local boards to a single, centralized model would represent a fundamental shift in the workforce system, rather than a permissible administrative adjustment.*

*Local workforce development boards are essential for maintaining strong connections to regional economies, supporting employer partnerships, and ensuring accountability to the communities they serve. Eliminating these boards would diminish local representation and risk weakening the alignment between workforce strategies and the specific needs of Arkansas’s diverse regions.*

*Such a change would run counter to WIOA's emphasis on locally informed and regionally responsive workforce systems.*

*For these reasons, it is respectfully requested that any waiver proposal or implementation strategy that would eliminate local workforce development boards or transfer their statutory responsibilities to the State Board be denied.*

**State's Response: Arkansas Workforce Connections-Office of Employment and Training**

Please see responses to comments #2, #4, and #19 above.

**Commenter 59 "LWDB Director" 5/18/2026 Section Reference (Waiver 1) Page Number 202**

*Waiver #1 - the Combined State Plan asserts that "The state board will continue to include local input into its activities through the establishing of regional business councils comprised of employers...." This sounds very much like the existing Local Workforce Development Boards, whose membership must be at least 51% represented by business, or it sounds like a very clever maneuver on the part of the State to reap all of the benefits of local input while having to meet none of the stringent and cumbersome WIOA board requirements which it now so strictly enforces upon the LWDBs. In specific detail, how are these regional councils organized, coordinated, and overseen for effectiveness? How many of these regional councils are envisioned and what are the geographic boundaries of each region? How are the members chosen, citing specifically any qualifications, criteria, credentials, or other parameters which must be met? Will there be personnel assigned from the State Board to serve as administrative staff to these regional councils, responsible for scheduling regular meetings, maintaining and recording the discussions, and forwarding their recommendations to the State board? What if a local party has a complaint or grievance with a regional council, or with a decision or statement it makes, what is the method of recourse? What will be the actual cost of establishing and maintaining these regional business councils and has this expense been factored into the plan's budget or cost-saving verbiage found in several places throughout the plan?*

**State's Response: Arkansas Workforce Connections-Office of Employment and Training**

The structure of the Regional Councils are still under development. The state intends to continue to consult local elected officials on the establishment of these groups. It is imperative that local leaders collaborate in these efforts to develop a charter inclusive of composition, meeting cadence, roles, and responsibilities.

**Commenter 60 "LWDB Director" 5/18/2026 Section Reference-Other Page Number 6**

*In response to #5 of the Executive Summary, Fiscal Stewardship: Investing in People and Employers. Since 2009, the Little Rock Workforce Development Board (LRWDB, and previously as the Little Rock Workforce Investment Board, LRWIB) has independently sought out and been awarded more than \$25 million in grants outside of its regular and annual allocation of WIOA funding. It has outpaced its allotment of WIOA funds by more than one and a half times. Much of this funding was intended to address the varying and specific challenges of a target population, such as young parents, disconnected older youth, TANF clients, long-term unemployed, and, most recently, those reentering society from the justice system. The LRWDB has worked with dozens of its local partners over those years to accomplish this record, a record that only intentional partnership and reciprocal support make possible. How does the State Combined Plan propose it will have an intimate knowledge of the local community's needs and potential partners to be able to seek out and win these types of awards? The Rock City Reentry Project (RCRP) has secured four federal DOL grants of \$8 million going back over ten years and several iterations of that agency's approach to reentry. The RCRP has either led the nation or been among the top of the awardees in each of those four grants. The LRWDB could not have accomplished these outcomes*

*by stretching its allocation of WIOA funds alone to address the issue. This example goes far to demonstrate that, once provided the appropriate and adequate resources, funding and support, the current local workforce development board structure is more than adequate to identify the needs within its local boundaries and execute an operational plan and program to rival any in the country. Unfortunately, an opposite mindset is found replete within this WIOA Combined State Plan, one that blames the local areas for being perennially underfunded, administratively lopsided for receiving diminishing program allocations, and underachievers of outcomes which have become ever more regulated, defined and technically difficult to achieve. Let's not make it a matter of Local-Know-How vs. State-Knows-Best. Are we not all Arkansans challenged by a similar set of circumstances?*

**State's Response: Arkansas Workforce Connections-Office of Employment and Training**

Despite the dedication of many local leaders, the current WIOA fragmented model has produced uneven outcomes, including fewer participants served and inconsistent performance across regions. In 2025, of \$16M total WIOA title I funding, only \$2.3M was applied to Arkansas citizens needing the training and associated services. At the same time, chief elected officials have carried significant financial liability for disallowed costs, even though they do not directly administer WIOA programs. The statewide model eliminates this burden entirely, removing unnecessary risk from local governments, while still maintaining defined local workforce development areas, each with its own funding allocations through existing formula methodologies.

By streamlining governance and operations under one board, integrating functions across programs, and braiding state-level grant funding, Arkansas can redirect approximately \$6 million annually from duplicative operating and overhead expenses to direct services for citizens and employers. These savings will allow the state to:

- Train more Arkansans for high-demand occupations
- Expand supportive services such as transportation, childcare, and work supplies
- Increase employer-driven investments, including customized training and work-based learning
- Deliver faster, more consistent services across all regions

This transition centralizes administration, not local services. Workforce staff will continue to live and work in the communities they serve, ensuring that local relationships remain strong. In addition, the state will expand the use of mobile workforce units to reach rural communities, small towns, and areas with limited access to brick-and-mortar centers. Services will remain local; what changes is the efficiency and accountability of the system supporting them.

5-4-2026

Arkansas Department of Commerce  
Arkansas Workforce Connections  
P.O. Box 2981  
Little Rock, AR 72203

Dear Secretary McDonald and Workforce Connections Leadership,

On behalf of Forward Searcy and the Searcy Regional Economic Development Corporation, I am writing to express our strong support for Arkansas' effort to integrate and modernize the state's Workforce Development System through the proposed WIOA waiver requests.

A well-aligned, efficient workforce system is critical to the success of communities like Searcy and the broader Arkansas economy. As an organization focused on supporting existing businesses, attracting new investment, and strengthening our workforce pipeline, we see firsthand the importance of a system that is responsive, coordinated, and accessible.

The proposed transition to a more unified statewide framework represents a meaningful opportunity to improve outcomes for both employers and job seekers. Streamlining governance, reducing administrative duplication, and reinvesting savings into direct services will strengthen Arkansas' ability to compete for high-quality jobs and support long-term economic growth.

We are particularly encouraged by the potential to:

- Expand access to workforce participation through supportive services such as transportation and childcare
- Increase employer-driven training and work-based learning opportunities
- Deliver more consistent and effective services across all regions of the state

These improvements directly align with the needs of our local employers, many of whom continue to face workforce challenges in recruitment, training, and retention. A more coordinated system will enhance our ability to respond to those needs while creating stronger pathways for our residents to access meaningful employment.

We also appreciate the emphasis on maintaining strong local connections through regional collaboration and employer engagement. Preserving the local voice while improving system-wide efficiency is essential, and we believe this approach strikes that balance.

Searcy is committed to being an active partner in strengthening Arkansas' workforce system. We support this effort and encourage its advancement as a step toward a more competitive, responsive, and opportunity-driven economy for our state.

Thank you for your leadership and continued commitment to Arkansas' workforce and economic future.

Sincerely,

Darrell Welch  
CEO, Forward Searcy  
President, Searcy Regional Economic Development Corporation



May 6, 2026

Arkansas Workforce Connections - Arkansas Department of Commerce

RE: Letter of Support – Integrating Arkansas’ Workforce Development System

To Secretary McDonald and the Arkansas Workforce Development Board:

On behalf of Arkansas Northeastern College (ANC), I am writing to express our support for the State of Arkansas’ proposal to transition to a single statewide workforce planning area under the Workforce Innovation and Opportunity Act (WIOA).

As the President of an institution focused on technical training and workforce development in Mississippi County, I recognize the critical need to modernize our decade-old workforce system. The proposed model to streamline governance and redirect approximately \$6 million annually from duplicative overhead directly into training and supportive services is a necessary shift for our state. In a region like ours, where industries such as steel manufacturing require a constant pipeline of skilled talent, the ability to apply more funding toward actual occupational skills training rather than administrative costs will have a measurable impact.

We are particularly encouraged by the commitment to maintaining local service delivery while centralizing administrative functions. The plan to establish Regional Business Councils is an essential safeguard to ensure that community employers and leaders continue to provide real-time insight into local skill gaps.

Arkansas Northeastern College stands ready to partner with the state in this transformation. We believe this unified approach to governance, funding, and strategy will create a more efficient and responsive system for Arkansans.

Sincerely,

A handwritten signature in black ink, appearing to read "C. H. ...", is written over a light blue horizontal line.

President, Arkansas Northeastern College



May 6, 2026

Re: Letter of Support for the 2026–2027 WIOA Combined State Plan Modification

To Whom It May Concern,

On behalf of the City of Bryant, I am pleased to offer my strong support for the 2026–2027 Workforce Innovation and Opportunity Act (WIOA) Combined State Plan Modification.

A strong and adaptable workforce is essential to the continued growth and success of our community. The proposed plan modification reflects a thoughtful and strategic approach to workforce development by strengthening collaboration among education, workforce, and economic development partners. These efforts are critical to ensuring that Arkansas remains competitive while meeting the needs of both employers and job seekers.

The City of Bryant values initiatives that promote career pathways, expand access to skills training, and create opportunities for individuals facing barriers to employment. The emphasis on work-based learning, sector partnerships, and data-driven strategies will help align workforce programs with real-world industry needs, ultimately supporting local businesses and fostering sustainable economic development.

Additionally, this plan recognizes the importance of serving all populations, including those who have historically been underserved. By prioritizing equitable access to workforce services, the state is making meaningful progress toward building a more inclusive and resilient economy.

We are confident that the 2026–2027 WIOA Combined State Plan Modification will strengthen workforce outcomes across Arkansas and provide long-term benefits to communities like Bryant. The City of Bryant stands ready to support these efforts and collaborate with state and regional partners to advance workforce initiatives.

Thank you for your continued leadership and commitment to workforce development.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Treat", is written over a horizontal line.

Chris Treat  
Mayor, City of Bryant



April 7, 2026

**City of Hot Springs  
Office of the Mayor**

Arkansas Workforce Development Board  
Primary submission email: [WIOA@arkansas.gov](mailto:WIOA@arkansas.gov)

Post Office Box 700  
Hot Springs National Park,  
Arkansas 71902

Re: Public Comment on Proposed WIOA Governance Changes in Arkansas

To Whom It May Concern:

I am writing in my capacity as Mayor for the City of Hot Springs, Arkansas, to express concern regarding the State's proposed changes to local workforce governance under the Workforce Innovation and Opportunity Act. Based on publicly discussed materials and recent board actions, the State appears to be moving toward a more centralized structure that could reduce or absorb the role of local workforce development boards.

For communities like ours, this is not an abstract governance issue. Local workforce systems work best when decisions are informed by local employers, local elected officials, local training providers, and the actual needs of the people seeking work and training.

I respectfully ask the State to clearly identify what it is proposing, the legal mechanism it intends to use, and how these changes would affect local workforce development boards, chief elected officials, employer engagement, one-stop oversight, and service delivery in each region. I also ask that no implementation steps be taken until all required public comment, consultation, and federal review processes are fully completed.

Local voice is not an obstacle to workforce development. It is one of the reasons the system works at all. I urge the Arkansas Workforce Development Board and State leadership to preserve meaningful local governance and to avoid changes that would hollow out local authority in the name of centralization.

Thank you for the opportunity to submit this comment.

Sincerely,

  
Pat McCabe, Mayor  
City of Hot Springs

MAYOR  
JIMMY L. WITT  
P.O. BOX 360  
OFFICE 120 N. FRONT

CITY ATTORNEY  
KENNARD K. HELTON  
P.O. BOX 297  
OFFICE 108 QUAY STREET

CITY CLERK  
AMANDA SMITH  
P.O. BOX 360  
OFFICE 120 N. FRONT



P.O. BOX 360 • Dardanelle, AR 72834  
479-229-4500 • Fax: 479-229-4804

ALDERMAN WARD 1  
BOBBY CHILDRESS  
KURT SPEARS

ALDERMAN WARD 2  
JENNY BERRYHILL  
CRYSTAL MALLOY

ALDERMAN WARD 3  
RASHAD WOODS  
KENNETH DUVAL

April 6, 2026

Arkansas Workforce Development Board  
Primary submission email: [WIOA@arkansas.gov](mailto:WIOA@arkansas.gov)

Re: Public Comment on Proposed WIOA Governance Changes in Arkansas

To Whom It May Concern:

I am writing in my capacity as Mayor Jimmy Witt for Dardanelle, Arkansas, to express concern regarding the State's proposed changes to local workforce governance under the Workforce Innovation and Opportunity Act. Based on publicly discussed materials and recent board actions, the State appears to be moving toward a more centralized structure that could reduce or absorb the role of local workforce development boards.

For communities like ours, this is not an abstract governance issue. Local workforce systems work best when decisions are informed by local employers, local elected officials, local training providers, and the actual needs of the people seeking work and training.

I respectfully ask the State to clearly identify what it is proposing, the legal mechanism it intends to use, and how these changes would affect local workforce development boards, chief elected officials, employer engagement, one stop oversight, and service delivery in each region. I also ask that no implementation steps be taken until all required public comment, consultation, and federal review processes are fully completed.

Local voice is not an obstacle to workforce development. It is one of the reasons the system works at all. I urge the Arkansas Workforce Development Board and State leadership to preserve meaningful local governance and to avoid changes that would hollow out local authority in the name of centralization.

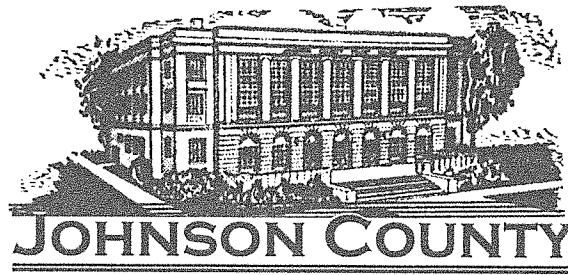
Thank you for the opportunity to submit this comment.

Sincerely,

Jimmy Witt  
Mayor  
Dardanelle, Arkansas

Justices of the Peace

Mike Jacobs      John Payne  
Paula Ober        Katie Howard  
Van Alan Hill     Kris Muldoon  
Bethany Bean     Larry Jones  
Mike Estes        Robert Petersen  
                         Bryan Cooper



HERMAN H. HOUSTON  
Johnson County Judge  
P.O. Box 278  
Clarksville, Arkansas 72830  
(479) 754-2175  
FAX (479) 754-6098

May 6, 2026

Arkansas Workforce Development Board

Email: [WIOA@arkansas.gov](mailto:WIOA@arkansas.gov)

Re: Regarding Public Comment on Proposed WIOA Waiver Requests, Statewide Workforce Governance Changes, and the Effect on Johnson County, Arkansas

To Whom It May Concern:

I am writing in my capacity as County Judge for Johnson County, Arkansas, to provide formal public comment on the proposed WIOA Combined State Plan modification and related waiver requests. I understand the State is seeking to redesign the way workforce services are governed, funded, and delivered across Arkansas. I also understand from the State's own public materials that this is not a limited administrative adjustment. The proposal would all the Arkansas Workforce Development Board to act as the local board, move Arkansas toward a single statewide planning structure, retain local-area funds at the state level, begin local workforce board closeout activities after federal approval, and rely more heavily on affiliate sites, mobile units, partner locations, virtual services, and statewide information systems in place of the current local governance model.

I appreciate the desire to improve service delivery and place more resources into training, work-based learning, supportive services, and direct help for employers and jobseekers. Johnson County has no interest in preserving paperwork for paperwork's sake. However, the State's proposal appears to reach far beyond efficiency. It would remove or weaken the local board structure that gives chief elected officials, employers, education partners, service providers, and community representatives a formal role in decisions that affect our own communities. Consultation after a state-level decision has already been made is not the same as local governance.

Johnson County should not be judged by statewide averages or served through a system designed primarily around urban access, high-speed internet, and centralized decision-making. Johnson County is a rural spread across roughly 661 square miles, with communities separated by distance, terrain, transportation barriers, and uneven access to broadband. Public data shows that only about three-quarters of Johnson County

households have a broadband internet subscription, and nearly one in five residents live below the poverty line. A workforce model that assumes residents can simply move through a virtual portal, reach a state call center, travel to a distant access point, or wait for occasional mobile service will not serve many of my constituents well.

For some residents, the barrier to employment is not a lack of interest in work. It is lack of transportation, limited childcare, limited digital access, low literacy, English language barriers, disability-related access needs, financial instability, or the simple fact that rural families often cannot afford to lose workday trying to navigate a distant or unfamiliar system. Those barriers are best understood by the people who live and work in the county. They are not solved by replacing judgment with a statewide information system, especially when the people most in need of service may be the least able to use that system without personal help.

Johnson County's labor market is also local in a very real sense. Clarksville and the surrounding area are shaped by poultry processing, manufacturing, distribution, health care, education, retail, agriculture, and transportation. Employers and institutions such as Tyson Foods, Walmart, Johnson Regional Medical Center, the Clarksville School District, Lamar School District, West Side School District, and other local businesses do not have identical needs to employers in every other part of the state. Our county also sits in the Arkansas River Valley, with access to Interstate 40, U.S. Highway 64, Union Pacific rail, and the Arkansas River system. Those assets create opportunities, but they also require training and service strategies that fit the workers and employers who are here.

A state-run model may promise consistency, but consistency is not the same as responsiveness. Johnson County needs workforce services that can respond quickly when a local employer needs applicants, when a manufacturer needs a skill upgrade, when a dislocated worker needs retraining, when an adult education provider identifies a student ready for a career pathway, or when a rural resident needs help with transportation, work clothes, testing, credentials, or enrollment. Local workforce boards and chief elected officials help make that possible because they understand the county, know the employers, know the partner network, and know where state-level assumptions do not match local conditions.

I am especially concerned that the State's draft describes a waiver that would allow the State Board to function as the local board under WIOA section 107(b) and 20 CFR 679.310(T). That is a substantial governance change. The State's materials also say that funds would continue to be calculated under a local-area methodology but retained at the state-level priorities, rather than distributed through the present local structure. In practical terms, Johnson County would be asked to accept the loss of local authority while

trusting that state-level priorities, state-level staffing, state-level technology, and regional business councils will adequately replace the present local governance role.

That approach raises serious legal and procedural concerns. WIOA was built around state and local partnership, not state control alone. Local workforce development boards have defined functions, chief elected officials have defined responsibilities, and local areas have statutory and regulatory protections. Federal waiver authority is not unlimited. Requirements concerning the establishment and functions of local areas and local boards have long been treated as protected from waiver. Arkansas law also continues to recognize local workforce development boards and assigns duties to them. If the State believes it can move around those state and federal limits, it should explain the exact legal route in writing before any final state board vote, federal submission, or implementation step.

The State's draft also states that program directors and legal staff are drafting potential legislation to address state laws that may limit the Governor's authority to designate a single statewide planning area with the State Board fulfilling local board roles, or that may otherwise create barriers to implementing the requested waiver. That sequence is troubling. If current Arkansas law creates barriers to the proposal, then those barriers should be addressed through the General Assembly before the State asks federal officials to approve a structure that may not yet be authorized under state law. Federal approval should not be used as a lever to pressure state-law changes after the fact.

I am also concerned that neither I nor many of my chief elected official colleagues in the West Central Arkansas Planning and Development District region have received the kind of direct briefing that should precede a change of this size. County judges, mayors, and other local elected officials should not be expected to discover the practical effect of a statewide governance redesign through a public-comment posting alone. Before the State moves forward, Johnson County and the other counties and municipalities affected by this proposal should receive a clear briefing on what local authority would remain, what local staff would remain, what local access points would remain, what funding would be controlled locally, what liabilities would remain with chief elected officials, and what remedies would exist if rural service delivery fails.

I request that Cody Waits and the appropriate State leadership pause any forward movement on the waiver package, state plan modification, local board closeout activity, or implementation planning until chief elected officials and affected local leaders have been properly briefed and given a meaningful opportunity to respond to the actual proposal. That briefing should include the exact waiver test, the State's legal memorandum, any proposed legislation, the effect on local board powers and duties, the effect on chief elected official authority, the effect on one-stop access in each local area, the effect on local staff and

contractors, the effect on employer engagement, and the effect on rural counties like Johnson County that cannot rely on virtual access as a substitute for local service.

I further request that the State provide a Johnson County-specific impact analysis before any decisive action is taken. That analysis should address how jobseekers without reliable internet service will receive help, how residents without transportation will access services, how older workers and low-literacy workers will navigate the system, how employers will receive timely local assistance, how training needs in poultry processing, manufacturing, distribution, health care, education, agriculture, and retail will be identified, and how the State will measure whether Johnson County residents are receiving better service rather than merely being folded into a larger statewide process.

Local voice is not an obstacle to workforce development. In rural counties, local voice is often the safeguard that keeps a program from becoming distant, procedural, and inaccessible to the people it was supposed to serve. Johnson County needs reform that strengthens service, not reform that removes the local people who understand where the service gaps are. A statewide information system can support local work, but it cannot replace local judgement, local relationships, and direct accountability to the people who live here.

For these reasons, I oppose any waiver, state plan modification, or implementation action that would eliminate, absorb, or materially weaken local workforce development board authority without full compliance with federal law, Arkansas law, public-comment requirements, consultation requirements, and meaningful chief elected official engagement. I urge the Arkansas Workforce Development Board and State leadership to preserve local governance, pause implementation, disclose the exact legal mechanism being used, and brief Johnson County and its regional partners before taking further action.

Thank you for the opportunity to provide this public comment.

Sincerely,

A handwritten signature in cursive script that reads "Herman H. Houston". The signature is written in black ink and is positioned above the typed name.

Herman H. Houston  
Johnson County Judge  
Johnson County, Arkansas



May 14, 2026

Arkansas Workforce Development Board

**City of Hot Springs**  
**City Manager's Office**  
**Bill Burrough, City Manager**  
*133 Convention Blvd.*  
*Hot Springs, AR 71901*

Re: Proposed WIOA Waiver Requests and Local Workforce Governance Changes Affecting Hot Springs

To Whom It May Concern:

I am submitting this comment as City Manager for the City of Hot Springs, Arkansas, and I oppose approval or implementation of the proposed WIOA waiver package unless the State can first show how local service access, employer response, funding, accountability, and in-person support will be preserved for Hot Springs and Garland County. My concern is practical and operational. The City of Hot Springs is responsible for public services that residents and visitors experience directly. When a system changes on paper, local government often deals with the real effect. A workforce governance change of this size should not move forward on general assurances, especially if the result is a more distant decision-making structure with fewer clear points of local accountability.

The City of Hot Springs is not opposed to modernization, better coordination, or responsible use of public funds. The City must manage those same priorities every day. However, efficiency does not mean much to a resident who cannot get transportation to an appointment, cannot upload documents, cannot understand an online process, or cannot reach the person who can solve the problem. A workforce model that looks efficient at the state level may become less effective at the local level if it reduces practical access to help.

The State's public materials identify seven waiver requests. Waiver #1 would allow the State Board to act like the Local Board. Waiver #2 would allow funds to be reallocated across local workforce areas. Waiver #3 would allow a network of affiliate sites in lieu of comprehensive centers. Waiver #4 would allow flexibility in training dollars and supportive services. Waiver #5 would allow the State Plan to act as the Regional Plan. Waiver #6 would allow flexibility in State Board composition. Waiver #7 would allow youth program element flexibility. The operational concern is not limited to one waiver. The concern is that the combined package could centralize planning, board functions, funding flexibility, service design, and youth programming without a clear local implementation plan.

Hot Springs has a mixed local economy and a mixed service population. Our residents and employers are tied to tourism, hospitality, restaurants, lodging, health care, retirement-related services, gaming and racing, construction, retail, education, public service, small business, utilities, transportation, streets, parks, airport development, and visitor services. Those sectors do not all respond to one statewide

workforce strategy in the same way. They require local attention, local employer relationships, and the ability to connect training and support to the conditions that exist in this city.

The City's own operating priorities show why local context must remain visible. The 2026 budget message identifies a balanced city budget, major infrastructure obligations, continued work on housing strategy, continued development of the Community Resource Center and its programs, airport terminal planning, transportation needs, parks and recreation planning, streets, utilities, public safety, and other essential services. Those priorities intersect with workforce development. Housing stability affects whether a person can keep a job. Transportation affects whether a person can reach work or training. Public projects and utility work affect demand for skilled labor. Tourism and visitor services affect seasonal hiring and entry-level pathways. Public safety and public works require a dependable local talent pipeline.

Recent City materials also show direct local workforce activity. The Hot Springs Community Resource Center Litter Abatement Program hired five unhoused individuals from the community to work, build resumes, prepare for employment, and move toward stability. The city also participated in Draft Day with more than sixty businesses and fourteen surrounding schools, reaching more than twelve hundred students. These examples show why workforce development must remain connected to local partners, local employers, local schools, and local service efforts. They also show why a process built mainly around state-level systems, virtual access, and affiliate sites may miss the people who need help the most.

I am particularly concerned about implementation. If local board authority is weakened, if a comprehensive service model is replaced by affiliate sites, if funds can be moved away from the local area, or if planning is absorbed into a statewide plan, then Hot Springs needs to know who remains responsible when a resident cannot access services or an employer cannot get a response. Local governments are often expected to answer for service gaps even when they do not control the system that created them.

Before any waiver is approved or implemented, the State should provide affected local officials and partners with the final waiver language, the legal analysis supporting the requested waiver, the proposed implementation schedule, the funding and reallocation plan, the staff and service transition plan, the in-person service plan, and a clear description of what local authority will remain after the change. The State has stated that it is seeking a waiver for the Arkansas Workforce Development Board to act as the local board under a single statewide planning area model. What remains unclear is how that waiver will interact with any redesignation process, local board closeout, State Board restructuring, regional business councils, local fund retention or redistribution, proposed state legislation, and the statutory role of local elected officials. Hot Springs should not be asked to rely on general assurances when the State's own materials describe a substantial governance and service-delivery transition.

The State should also answer several practical questions before moving forward. What workforce presence will remain in Hot Springs? How will residents without reliable transportation or digital access receive help? What role will local employers have before decisions are made? How will tourism, hospitality, health care, construction, transportation, youth career exposure, and small business needs be reflected in service planning? How will the city, Garland County, local schools, National Park College, local nonprofits, and chambers remain active partners rather than after-the-fact advisors?


This is not a partisan objection. It is a service delivery objection. The concern is whether a system can be implemented cleanly, whether accountability is clear, whether residents can reach help, whether employers can reach staff, and whether the plan protects the local partnerships that already exist. The State may believe it can improve the system, but it should not ask local communities to accept a major governance change without a complete explanation of how the change will work in practice.

For these reasons, I respectfully request that Cody Waits, the Arkansas Workforce Development Board, and the appropriate State officials pause further waiver submission, local board closeout activity, transition planning, or implementation steps affecting local workforce governance until Hot Springs, Garland County, and the other affected chief elected officials and local partners have received a full briefing and a meaningful opportunity to respond on the record.

Workforce reform should improve service in Hot Springs. It should not move authority away from the local relationships that make service possible. I urge the State to preserve meaningful local governance, disclose the legal and operational path, and protect local access before taking any further steps toward a statewide model.

Thank you for the opportunity to submit this comment.

Sincerely,

A handwritten signature in blue ink that reads "Bill Burrough". The signature is fluid and cursive.

Bill Burrough  
City Manager  
City of Hot Springs

cc: AWDB@arkansas.gov; ADWS.Info@arkansas.gov; hugh.mcdonald@arkansas.gov;  
commerce@arkansas.gov; charisse.childers@arkansas.gov; cody.waits@arkansas.gov



STATE OF ARKANSAS

# House of Representatives

## REPRESENTATIVE

Les Warren

Assistant Speaker Pro Tempore

P. O. Box 22900

Hot Springs, Arkansas 71903

501-520-8201 Cell

les.warren@arkansashouse.org

DISTRICT: 84

Counties:

Part Garland

## COMMITTEES:

Revenue and Taxation

Insurance and Commerce

Chairperson,

Joint Committee on Public Retirement and

Social Security Programs

2nd Alternate,

Legislative Joint Auditing Committee

Joint Budget

April 9, 2026

Secretary Hugh McDonald  
Arkansas Department of Commerce  
One Commerce Way, Suite 601  
Little Rock, AR 72201

Dear Secretary McDonald:

I am writing to express concern about the State's intention to change the structure of Arkansas's local Workforce Development Boards. The State appears to be moving toward a more centralized model. In this model, local board functions would be reduced, absorbed, or displaced at the state level.

Any proposal that would weaken or absorb those local functions raises serious questions. At a minimum, it would appear to increase the distance between workforce planning and the communities those services are supposed to support. It also raises concerns about whether employer engagement, one-stop oversight, local plan development, fiscal accountability, and responsiveness to regional labor market conditions can be preserved under a consolidated structure.

Local Workforce Development Boards were established under section 107 of the Workforce Innovation and Opportunity Act. In Arkansas, they continued through Act 907 of 2015. These boards were created to reflect local labor markets and meet local employer needs. They involve local elected officials and consider the practical realities of service delivery in each workforce area.

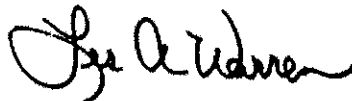
Before any change moves forward, I respectfully request clear written answers to the following.

1. What exactly is being proposed with respect to local Workforce Development Boards, local Workforce Development areas, and one-stop oversight responsibilities?
2. What legal authority allows the State to change, reduce, absorb, or replace functions currently assigned to local Workforce Development Boards under federal and state law?
3. How will the department preserve local governance, employer engagement, and local elected official input if core board functions are shifted to the State?
4. What analysis has been conducted regarding the operational, fiscal, and service delivery impacts this change would have on local areas?
5. What opportunity local elected officials, business leaders, Chambers of Commerce, and Community Stakeholders have to review and comment on the full scope of the proposal before any final action is taken?

This issue is significant not only as a governance question, but as a practical question of service to Arkansas communities. Any effort to centralize those functions should be approached with caution, full transparency, and a meaningful opportunity for public review.

Thank you for your attention to this issue. I would appreciate a written response at your earliest opportunity.

Sincerely,



Les Warren  
State Representative  
District 84

LW/vs

April 29, 2026

Arkansas Workforce Development Board  
via email: [wioa.comments@arkansas.gov](mailto:wioa.comments@arkansas.gov)

Re: Public Comment on Proposed WIOA Governance Changes in Arkansas

To Whom It May Concern:

I am writing in my capacity as County Judge for Saline County, Arkansas, to express concern regarding the State's proposed changes to local workforce governance under the Workforce Innovation and Opportunity Act. Based on publicly discussed materials and recent board actions, the State appears to be moving toward a more centralized structure that could reduce or absorb the role of local workforce development boards.

For communities like ours, this is not an abstract governance issue. Local workforce systems work best when decisions are informed by local employers, local elected officials, local training providers, and the actual needs of the people seeking work and training. A statewide structure may sound more efficient on paper, but it risks creating more distance between policy decisions and the communities those decisions affect.

Our local area has its own labor market conditions, transportation realities, employer demands, and service delivery challenges. What works in one part of Arkansas may not work in another. That is exactly why local boards are critical to the areas they serve. They provide structure for local planning, one-stop oversight, employer engagement, and alignment with community conditions that cannot be fully understood from a centralized vantage point.

I am particularly concerned that this proposal could weaken the role of local elected officials and reduce the voice of local business and community leadership in workforce policy. WIOA was built around meaningful local participation. Any proposal that materially changes that framework should be approached with full transparency, full consultation, and a clear explanation of legal authority and local impact.

I respectfully ask the State to clearly identify what it is proposing, the legal mechanism it intends to use, and how these changes would affect local workforce development boards, chief elected officials, employer engagement, one-stop oversight, and service delivery in each region. I also ask that no implementation steps be taken until all required public comment, consultation, and federal review processes are fully completed.

Arkansas Workforce Development Board

April 29, 2026

Page 2

I further urge the State to weigh the practical effect on communities like Saline County. In our area, workforce decisions affect major employers in education, healthcare, and manufacturing, as well as the ability of residents to access jobs across Benton, Bryant, and more rural parts of Saline County where transportation can be a barrier. They also directly impact the success of our regional Comprehensive Economic Development Strategy, which is built on locally driven priorities, employer engagement, and coordination across Central Arkansas. A governance structure that weakens local input risks undermining those efforts and the regional alignment they depend on.

This concern is not hypothetical for our community. In 2023, the State closed the Workforce Center in Benton, requiring job seekers in Saline County to travel outside the county to access Arkansas Workforce services. That change has already created additional barriers for residents, particularly those with limited transportation options. At the same time, our local workforce system benefits from direct input by business leaders such as David Chreene of Pafford Medical Services and Justin McCauley of McCauley Services, who serve on the local workforce development board. Their involvement ensures workforce services remain aligned with real employer needs, and that kind of local insight is critical to building an effective system.

Local voice is not an obstacle to workforce development. It is one of the reasons the system works at all. I urge the Arkansas Workforce Development Board and State leadership to preserve meaningful local governance and to avoid changes that would hollow out local authority in the name of centralization.

Thank you for the opportunity to submit this comment.

Sincerely,

Matt Brumley

cc: [awdb@arkansas.gov](mailto:awdb@arkansas.gov)  
[policy@arkansas.gov](mailto:policy@arkansas.gov)  
[charisse.childers@arkansas.gov](mailto:charisse.childers@arkansas.gov)  
[commerce.communications@arkansas.gov](mailto:commerce.communications@arkansas.gov)

4/8/2026

Arkansas Workforce Development Board  
Primary submission email: [WIOA@arkansas.gov](mailto:WIOA@arkansas.gov)

Re: Public Comment on Proposed WIOA Governance Changes in Arkansas

To Whom It May Concern:

I am writing as the CEO of Clearway Credit Union in Malvern and as a local employer to express concern regarding the State's proposed changes to local workforce governance under the Workforce Innovation and Opportunity Act. From an employer perspective, the strength of WIOA is that it keeps workforce strategy close to the regional labor market. A shift toward a more centralized structure that reduces the role of local workforce development boards risks weakening employer engagement and slowing the feedback loop between local hiring needs and training decisions.

In Hot Spring County, employers rely on practical partnerships that connect jobseekers to credentials, work-based learning, and supportive services that improve retention. Those partnerships are built locally—through relationships with training providers, economic development, and industry leaders—and they are most effective when local boards can set priorities based on real-time conditions (open roles, wage pressures, seasonal demand, and emerging skill gaps).

Before moving forward, I respectfully request that the State provide a detailed, written proposal that explains: (1) the governance model being considered and the legal authority for the change; (2) how employer representation and decision rights will be maintained at the regional level; (3) how performance accountability will work (metrics, targets, and corrective action); and (4) how one-stop operations and service levels will be maintained or improved in each area. I also ask that no implementation steps be taken until required public comment, consultation with affected local partners, and federal review are fully completed.

Local governance is not a barrier to results—it is a core control that keeps workforce investments aligned to regional demand and accountable to employers and taxpayers. I urge the Arkansas Workforce Development Board and State leadership to preserve meaningful local authority and a strong employer voice, and to prioritize any reforms that demonstrably improve time-to-employment, credential attainment, and retention outcomes rather than concentrating decision-making further from the labor market it is intended to serve.

Thank you for the opportunity to submit this comment.

Sincerely,

Tammy Passafiume  
CEO, Clearway Credit Union  
Malvern, Hot Spring County, Arkansas



May 15, 2026

Arkansas Workforce Development Board

**City of Hot Springs  
Office of the Mayor**

Re: Proposed WIOA Waiver Requests and Local Workforce Governance Changes

Post Office Box 700  
Hot Springs National Park,  
Arkansas 71902

To Whom It May Concern:

I am submitting this comment as Mayor of Hot Springs, Arkansas, and I oppose approval or implementation of the proposed WIOA waiver and related local workforce governance changes unless the State can first show clear legal authority, complete the required consultation with affected local officials, and protect meaningful local governance for Hot Springs residents and employers. The State has stated that it is seeking a waiver for the Arkansas Workforce Development Board to act as the local board under a single statewide planning area model. My concern is not whether Arkansas may try to improve the workforce system. My concern is whether a change of this size can be made lawfully without weakening the local voice that Congress and Arkansas law built into the system.

This is not a partisan comment. Workforce development should not be handled as a partisan issue. Mayors, county judges, city directors, employers, educators, and service partners may come from different political backgrounds, but local access to training, employment, transportation solutions, employer support, and one-stop services is a practical community concern. When a resident cannot get help completing paperwork, when an employer cannot find workers, when a young person needs a credential, or when a parent needs support to move into work, that problem reaches local leaders first regardless of party.

Hot Springs cannot be fairly understood through a statewide assumption alone. Our city is a regional employment, tourism, health care, education, and service center. We depend on hospitality, lodging, food service, health care, retirement-related services, public services, construction, manufacturing, transportation, education, small business, and the many employers connected to Oaklawn, National Park College, our hospitals, downtown, the Convention Center, Lake Hamilton, and Hot Springs National Park. Some employers need seasonal workers. Some need credentialed health care staff. Some need dependable entry-level employees. Some need workers who can pass background checks, complete training, get transportation, or stay attached to work through unstable schedules. Those needs are local and practical, not abstract.

The people most affected by workforce decisions are often the least able to overcome distance, delay, and confusing systems. Hot Springs has residents who face transportation barriers, limited income, disability, age-related limits, unstable housing, child care needs, and difficulty navigating online systems. Even when a resident has internet access, that does not mean the person can complete intake forms,

upload documents, manage passwords, understand eligibility, or resolve a problem without help. For many residents, local workforce access is the difference between getting help and giving up.

That is why local governance should not be treated as administrative clutter. Local boards, local elected officials, local employers, and local service partners are closest to the person looking for work and the employer trying to hire. If the State centralizes authority while relying more heavily on affiliate sites, virtual access, mobile access, statewide staff, regional business councils, or state-level decision making, then the State needs to explain exactly how Hot Springs residents and employers will keep a real voice in service design, funding priorities, one-stop oversight, employer engagement, and problem solving.

The State's public materials raise more than one issue. They do not describe only a narrow waiver. They point toward State Board substitution for local boards, a single statewide planning area, local board closeout activity, statewide service delivery, staff transition, State Board restructuring, funding flexibility, and state legislation. The State's own plan also states that Arkansas program directors and legal staff are drafting potential legislation to amend state laws that may limit the Governor's authority to designate a single statewide planning area with the State Board fulfilling the roles of local boards. That acknowledgment is important because it shows the State itself recognizes legal barriers that must be addressed before local authority is reduced in practice.

Arkansas did not come into WIOA as a blank slate or as a single statewide local area. Arkansas had ten local workforce investment areas under WIA before WIOA was written and signed into law, and the State's 2012 through 2016 WIA State Integrated Workforce Plan identified those ten areas as the existing local workforce structure. WIOA section 106(b)(2), codified at 29 U.S.C. 3121(b)(2), carried forward existing WIA local areas through the initial designation process when performance and fiscal integrity standards were met. The special single-state local area provision in WIOA section 106(d), codified at 29 U.S.C. 3121(d), and 20 C.F.R. 679.270 applies only to a state that was already a single state local area under WIA as of July 1, 2013. Arkansas does not appear to fit that legacy path. If the State now intends to move from ten local areas and local boards to a statewide structure, it should identify the lawful mechanism for doing so and should not treat the waiver process as a substitute for the designation, redesignation, consultation, public comment, and appeal protections built into WIOA.

The federal issue should be addressed directly. WIOA allows states to request waivers in some circumstances, and Arkansas may ask for one. But waiver authority is not unlimited. WIOA section 189(i)(3)(A), codified at 29 U.S.C. 3249(i)(3)(A), excludes from waiver the establishment and functions of local areas and local boards. WIOA section 190(a)(1), codified at 29 U.S.C. 3250(a)(1), uses the same limitation in the workforce flexibility plan context. WIOA section 107(a), codified at 29 U.S.C. 3122(a), states that there shall be a local workforce development board in each local area, and WIOA section 107(c), codified at 29 U.S.C. 3122(c), assigns local board appointment to the chief elected official. Those provisions are part of the structure Congress created.

The Department of Labor's own published waiver guidance recognizes that limit. TEGL 8-18 lists the establishment and functions of local areas and local workforce development boards among the subjects outside the Secretary's waiver authority. TEGL 05-25 may identify a waiver concept that would allow a state board to act as a local board, but guidance cannot override the statute. The question is not simply

whether Arkansas can submit Waiver Number 1. It can. The question is whether the Department of Labor can lawfully approve a waiver that effectively absorbs, supplants, or winds down local boards and local board functions that federal law places outside waiver authority.

Arkansas law creates a separate and equally serious issue. Arkansas Code section 15-4-3709 provides for a local workforce development board in each local workforce development area and gives chief elected officials appointment authority. Arkansas Code section 15-4-3710 requires the Governor to certify one local workforce development board for each local workforce development area every two years. Arkansas Code section 15-4-3711 assigns local board functions and states that the chief elected official shall serve as the local grant recipient and shall be liable for misuse of local grant funds unless an agreement is reached with the Governor for the Governor to act as local grant recipient and bear liability. A waiver request should not be used to bypass those state-law responsibilities before the General Assembly has acted and before affected local officials understand what authority, liability, funding, and oversight remain local.

Because the State has already identified a waiver as its chosen path, affected local officials should not be left guessing about how that waiver will operate. Before any local authority is reduced in practice, the State should provide the final waiver language, the legal analysis supporting the request, the proposed implementation schedule, the funding and reallocation plan, the staff and service transition plan, the in-person service plan, and a clear description of what local authority will remain after the change. That explanation should address federal waiver limits, Arkansas statutes governing local boards and chief elected officials, the State's proposed legislation, local board closeout, State Board restructuring, regional business councils, local fund retention or redistribution, and accountability when a resident or employer cannot get timely help.

Public comment should not be treated as a formality after the decision has already been made. As Mayor of Hot Springs, I have a responsibility to speak for the residents, employers, workers, and families who depend on local access to workforce services. Before implementation begins, municipal elected officials, the City Board, the City Manager, Garland County officials, other chief elected officials, employers, education partners, and service providers should receive a full briefing on the proposed change.

I do not support a process that removes decision authority from the communities closest to the work while asking those same communities to live with the consequences. In our form of government, laws are made through the elected legislative process, carried out by the executive branch, and subject to review by the judiciary. A waiver process should not be used to accomplish by administrative action what should be addressed openly through lawful authority, public debate, and proper legislative action. Hot Springs should not be asked to trade local accountability for a statewide structure that places decision making farther from the residents and employers affected by those decisions.

For these reasons, I respectfully request that Cody Waits and the Arkansas Workforce Development Board pause any further implementation, transition, local board closeout, or final action affecting local workforce governance until Hot Springs and the other affected local officials in the West Central Arkansas Planning and Development District have been fully briefed and given a meaningful opportunity

to respond on the record. That request should not be read as resistance to reform. It is a request for lawful process, local accountability, and fair treatment of communities that rely on workforce services every day.

Local voice is not an obstacle to workforce development. It is one of the reasons the system can respond to real community needs. I urge the State to preserve meaningful local governance and to avoid any restructuring that would leave Hot Springs residents, employers, and elected officials with less direct access to the decisions that affect our local workforce.

Thank you for the opportunity to submit this comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Pat McCabe', is written over the typed name.

Pat McCabe  
Mayor  
City of Hot Springs, Arkansas

<b>EMPLOYMENT AND TRAINING ADMINISTRATION</b> <b>ADVISORY SYSTEM</b> <b>U.S. DEPARTMENT OF LABOR</b> <b>Washington, D.C. 20210</b>	<b>CLASSIFICATION</b> WIOA/Wagner-Peyser
	<b>CORRESPONDENCE SYMBOL</b> OWI
	<b>DATE</b> April 28, 2026

**ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 10-25**

**TO:** STATE WORKFORCE AGENCIES  
ALL STATE WORKFORCE LIAISONS

**FROM:** HENRY MACK, ED.D. /s/  
Assistant Secretary

**SUBJECT:** Workforce Innovation and Opportunity Act Adult, Dislocated Worker, and Youth Activities Program Allotments for Program Year 2026; Program Year Allotments for the Wagner-Peyser Act Employment Service Program; and Program Year 2026 Allotments of Workforce Information Grants to States and Outlying Areas

1. **Purpose.** To provide information to states and outlying areas on Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, and Youth Activities program allotments for Program Year (PY) 2026; PY 2026 allotments for the Wagner-Peyser Act Employment Service (ES) Program, as required by section 6(b)(5) of the Wagner-Peyser Act, as amended; and the allotments of Workforce Information Grants to states for PY 2026.
2. **Action Requested.** States and outlying areas must follow the requirements in this guidance to obtain the federal funds needed to manage their programs.
3. **Summary and Background.**
  - a. Summary - This document provides grantees with guidance and information including:
    - How to obtain the federal funds covered by this Training and Employment Guidance Letter (TEGL) and financial reporting requirements;
    - The potential for reallocation of PY 2026 funds based on unobligated balances of PY 2025 funds in excess of 20 percent of their allotment at the end of PY 2025 (6/30/26);
    - Requirements when calculating sub-state allocations to local areas;
    - Funds set aside for evaluations, program integrity, and other department transfers;
    - Salary caps at the Executive Level II;
    - Waivers of the competition requirement for outlying areas; and
    - Authority for outlying areas to submit an application for a single consolidated grant for Adult, Dislocated Worker, and Youth funds.
  - b. Background - On February 3, 2026, the Consolidated Appropriations Act, 2026 was enacted and from this point forward, referred to as “the Act”.

<b>RESCISSIONS</b> None	<b>EXPIRATION DATE</b> Continuing
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The Act allows the Secretary of Labor (Secretary) to set aside up to 0.5 percent of each discretionary appropriation for activities related to program integrity and up to 0.75 percent of most operating funds for evaluations. Additionally, section 102 allows for up to 1 percent of discretionary funds in the Act to be transferred between programs, projects, or activities. For 2026, as authorized by the Act, the Department has set aside \$645,000 of the Training and Employment Services (TES) and \$155,000 of the State Unemployment Insurance and Employment Services Operations (SUIESO) appropriations impacted in this TEGL for these activities. Employment and Training Administration (ETA) reserved these funds from the WIOA Adult, Youth, Dislocated Worker, and Wagner-Peyser Act ES program budgets. Any funds not utilized for these reserve activities will be provided to the states.

The Act makes PY 2026 Youth Activities funds available for obligation on April 1, 2026, and funds the WIOA Adult and Dislocated Worker programs in two separate appropriations. The first appropriations for the Adult and Dislocated Worker programs become available for obligation on July 1, 2026; this portion is commonly referred to as “base” funds. The second appropriations for the Adult and Dislocated Worker programs become available for obligation on October 1, 2026; this portion is commonly referred to as “advance” funds because they are provided in the appropriations act passed during the fiscal year immediately before the fiscal year when the funds are available. For example, funds for PY 2026 that will be made available on October 1, 2026, were appropriated during FY 2026, but not made available until FY 2027, and are called the FY 2027 “advance” funds. See Attachment A for details.

The Act also includes the specification that the Secretary may reserve no more than 10 percent of the Dislocated Worker National Reserve funds to provide technical assistance and carry out additional activities related to the transition to WIOA. Additionally, salary caps are imposed under the Act. The funds provided to grantees in the allotments discussed in this TEGL must not be used by a recipient or sub-recipient to pay the salary and bonuses of an individual, either as direct costs or indirect costs, at a rate in excess of Executive Level II. The rates of basic pay for the Executive Schedule are found at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>. States also may establish lower salary caps. See [TEGL 10-24](#), *Salary and Bonus Limitation Imposed by Appropriations Language*.

WIOA allotments for states are based on formula provisions contained in WIOA (see Attachment B for WIOA and Wagner-Peyser Act formula descriptions). The Act waives the competition requirement regarding funding to outlying areas (i.e., American Samoa, Guam, Commonwealth of the Northern Mariana Islands, the Republic of Palau, and the United States Virgin Islands). For PY 2026, outlying area grant amounts are based on the administrative formula determined by the Secretary that was used under the Workforce Investment Act.

Additionally, the Act allows outlying areas to submit a single application according to the requirements established by the Secretary for a consolidated grant for Adult, Youth, and Dislocated Worker funds. Subject to approval of the grant application and other reporting

requirements of the Secretary, the Act allows outlying areas receiving a consolidated grant to use those funds interchangeably between Adult, Youth, and Dislocated Worker programs or activities. Outlying areas must follow steps identified in Appendix VII if they want to consolidate those funds into a single grant. However, if outlying areas are not consolidating the Adult, Dislocated Worker, and Youth funds they must follow steps identified in Appendix VI.

WIOA specifically includes Palau as an outlying area, except during any period for which the Secretary of Labor and the Secretary of Education determine that a Compact of Free Association is in effect and contains provisions for training and education assistance prohibiting the assistance provided under WIOA. No such determinations prohibiting assistance have been made (WIOA sec. 3(45)(B)), and therefore the Republic of Palau may obtain allotments.

In addition to this TEGL, ETA will publish the allotments and descriptions of the allotment formulas in the [Federal Register](#). In this Federal Register notice, ETA will invite comments on the allotment formula for outlying areas.

- 4. WIOA PY 2026 Allotments.** Please see Appendices I through VII for guidance and Attachments A through L for formula descriptions and allotment tables.

Under WIOA sec. 128(a), Governors shall reserve not more than 15 percent of the WIOA Adult, Dislocated Worker, and Youth allotments for statewide activities. In addition to the required statewide activities described in WIOA sec. 134(a)(2), Governors may use statewide activities funds for a wide range of allowable statewide employment and training activities described in WIOA sec. 134(a)(3) – a list which is illustrative not limited. Attachment L provides a table listing the estimated Governor’s reserve maximums for each state.

- 5. Inquiries.** Questions regarding these allotments may be directed to the appropriate Regional Office. Information on allotments and planning requirements may also be found on the ETA website at <https://www.dol.gov/agencies/eta>.

- 6. References.**

- Consolidated Appropriations Act, 2026 (Pub.L. 119-75);
- Full-Year Continuing Appropriations and Extensions Act, 2025 (Pub.L. 119-4);
- Balanced Budget and Emergency Deficit Control Act of 1985, as amended (Title II of Pub. L. 99-177);
- Bipartisan Budget Act of 2018 (Pub. L. 115-123);
- Budget Control Act of 2011 (Pub. L. 112-25);
- Data for Persons Defined as Disadvantaged Youth and Adults (2016-2020) <https://www.dol.gov/agencies/eta/budget/formula/disadvantagedyouthadults>;
- Workforce Innovation and Opportunity Act (Pub. L. 113-128);
- Wagner-Peyser Act, as amended (29 U.S.C. 49 et seq.);
- TEGL 10-24, *Salary and Bonus Limitation Imposed by Appropriations Language*, published January 17, 2025 <https://www.dol.gov/agencies/eta/advisories/tegl-10-24>;

- TEGL No.16-22, *Revised ETA-9130 Financial Report Instructions and Additional Guidance*; published May 12, 2023 <https://www.dol.gov/agencies/eta/advisories/tegl-16-22>;
- TEGL No. 01-23, *Updated Disadvantaged Youth and Adult Data for use in Program Year (PY) 2023 and future Workforce Innovation and Opportunity Act (WIOA) Youth and Adult Within-State Allocation Formulas*, published July 31, 2023 <https://www.dol.gov/agencies/eta/advisories/tegl-01-23>; and
- *Local Area Unemployment Statistics (LAUS) Technical Memorandum No. S-25-17 Program Year 2026 Areas of Substantial Unemployment under the Workforce Innovation and Opportunity Act*, dated July 28, 2025.

## 7. **Attachments.**

- Appendix I – WIOA Youth Allotment Activities
- Appendix II – WIOA Adult Allotment Activities
- Appendix III – WIOA Dislocated Worker Allotment Activities
- Appendix IV – Wagner-Peyser Act ES Allotment Activities
- Appendix V – Workforce Information Grants Allotment Activities
- Appendix VI – Submission Requirements and Reporting
- Appendix VII – Submission Requirements and Financial Reporting for Outlying Areas WIOA Title I Grant Consolidation
- Attachment A – Program Year 2026 Funding
- Attachment B – WIOA and Wagner-Peyser Statutory Formula Descriptions for State Allotments
- Attachment C – WIOA Statutory and Discretionary Formulas for Sub State Allocations
- Attachment D – WIOA Youth Activities State Allotments, PY 2026 vs PY 2025
- Attachment E – WIOA Adult Activities State Allotments, PY 2026 vs PY 2025
- Attachment F – WIOA Adult Activities PY 2026 State Allotments, July 1, and October 1 Funding
- Attachment G – WIOA Dislocated Worker Activities State Allotments, PY 2026 vs PY 2025
- Attachment H – WIOA Dislocated Worker Activities PY 2026 State Allotments, July 1, and October 1 Funding
- Attachment I – Employment Service (Wagner-Peyser) Allotments, PY 2026 vs PY 2025
- Attachment J – Workforce Information Grants to States Allotments, PY 2026 vs PY 2025
- Attachment K – WIOA Youth, Adult, and Dislocated Worker Outlying Areas Funding, PY 2026
- Attachment L – Estimated Governor's Reserve Maximums

U.S. Department of Labor  
Employment and Training Administration  
WIOA Youth Activities State Allotments  
Comparison of PY 2026 Allotments vs PY 2025 Allotments

State	PY 2025	PY 2026	Difference	% Difference
<b>Total</b>	<b>\$936,974,800</b>	<b>\$946,979,800</b>	<b>\$10,005,000</b>	<b>1.07%</b>
Alabama	8,374,633	9,191,727	817,094	9.76%
Alaska	3,076,467	2,798,386	(278,081)	-9.04%
Arizona	20,629,527	19,267,846	(1,361,681)	-6.60%
Arkansas	6,199,664	6,212,277	12,613	0.20%
California	168,549,346	156,286,824	(12,262,522)	-7.28%
Colorado	11,038,571	14,503,373	3,464,802	31.39%
Connecticut	10,129,143	9,213,572	(915,571)	-9.04%
Delaware	3,149,146	2,864,495	(284,651)	-9.04%
District of Columbia	4,047,766	3,797,571	(250,195)	-6.18%
Florida	36,051,150	42,561,138	6,509,988	18.06%
Georgia	15,575,092	16,599,321	1,024,229	6.58%
Hawaii	3,024,364	2,750,992	(273,372)	-9.04%
Idaho	3,053,834	3,966,623	912,789	29.89%
Illinois	51,532,517	46,874,502	(4,658,015)	-9.04%
Indiana	16,020,894	18,151,132	2,130,238	13.30%
Iowa	4,733,939	5,938,091	1,204,152	25.44%
Kansas	4,171,693	5,481,110	1,309,417	31.39%
Kentucky	16,711,538	17,779,204	1,067,666	6.39%
Louisiana	13,943,764	15,079,497	1,135,733	8.15%
Maine	2,301,532	2,414,374	112,842	4.90%
Maryland	14,496,158	13,185,853	(1,310,305)	-9.04%
Massachusetts	16,905,672	22,212,048	5,306,376	31.39%
Michigan	30,600,102	39,722,382	9,122,280	29.81%
Minnesota	7,719,711	8,746,210	1,026,499	13.30%
Mississippi	7,694,466	6,998,965	(695,501)	-9.04%
Missouri	11,547,823	14,428,367	2,880,544	24.94%
Montana	2,301,532	2,326,108	24,576	1.07%
Nebraska	2,777,724	3,373,156	595,432	21.44%
Nevada	13,780,336	13,198,383	(581,953)	-4.22%
New Hampshire	2,301,532	2,326,108	24,576	1.07%
New Jersey	30,882,177	28,090,743	(2,791,434)	-9.04%
New Mexico	6,966,908	6,337,170	(629,738)	-9.04%
New York	64,583,434	58,745,749	(5,837,685)	-9.04%
North Carolina	24,203,148	23,260,666	(942,482)	-3.89%
North Dakota	2,301,532	2,326,108	24,576	1.07%
Ohio	35,253,325	41,069,654	5,816,329	16.50%
Oklahoma	7,230,619	6,577,045	(653,574)	-9.04%
Oregon	11,043,514	12,638,428	1,594,914	14.44%
Pennsylvania	38,706,078	35,207,443	(3,498,635)	-9.04%
Puerto Rico	17,337,360	15,770,239	(1,567,121)	-9.04%
Rhode Island	2,920,789	3,837,570	916,781	31.39%
South Carolina	10,115,862	13,291,043	3,175,181	31.39%
South Dakota	2,301,532	2,326,108	24,576	1.07%
Tennessee	13,145,214	14,757,608	1,612,394	12.27%
Texas	86,093,073	83,028,726	(3,064,347)	-3.56%
Utah	4,194,972	5,005,182	810,210	19.31%
Vermont	2,301,532	2,326,108	24,576	1.07%
Virginia	11,703,814	12,893,863	1,190,049	10.17%
Washington	20,361,373	18,520,912	(1,840,461)	-9.04%
West Virginia	5,282,714	4,805,210	(477,504)	-9.04%
Wisconsin	8,942,740	9,051,847	109,107	1.22%
Wyoming	2,301,532	2,326,108	24,576	1.07%
<b>State Total</b>	<b>920,612,878</b>	<b>930,443,165</b>	<b>9,830,287</b>	<b>1.07%</b>
American Samoa	337,424	341,148	3,724	1.10%
Guam	926,014	936,235	10,221	1.10%
Northern Marianas	432,422	437,194	4,772	1.10%
Palau	75,000	75,000	0	0.00%
Virgin Islands	536,440	542,361	5,921	1.10%
<b>Outlying Areas Total</b>	<b>2,307,300</b>	<b>2,331,938</b>	<b>24,638</b>	<b>1.07%</b>
<b>Native Americans</b>	<b>14,054,622</b>	<b>14,204,697</b>	<b>150,075</b>	<b>1.07%</b>

U.S. Department of Labor  
Employment and Training Administration  
WIOA Adult Activities State Allotments  
Comparison of PY 2026 Allotments vs PY 2025 Allotments

State	PY 2025	PY 2026	Difference	% Difference
<b>Total</b>	<b>\$883,351,000</b>	<b>\$875,480,000</b>	<b>(\$7,871,000)</b>	<b>-0.89%</b>
Alabama	8,187,967	8,898,722	710,755	8.68%
Alaska	2,911,706	2,597,185	(314,521)	-10.80%
Arizona	19,520,972	17,859,619	(1,661,353)	-8.51%
Arkansas	6,024,321	5,958,432	(65,889)	-1.09%
California	163,337,664	149,671,359	(13,666,305)	-8.37%
Colorado	10,150,973	13,078,681	2,927,708	28.84%
Connecticut	9,185,592	8,193,370	(992,222)	-10.80%
Delaware	3,056,641	2,726,465	(330,176)	-10.80%
District of Columbia	3,683,180	3,390,908	(292,272)	-7.94%
Florida	38,614,664	44,375,942	5,761,278	14.92%
Georgia	14,980,465	15,745,416	764,951	5.11%
Hawaii	3,082,097	2,749,171	(332,926)	-10.80%
Idaho	2,863,713	3,480,799	617,086	21.55%
Illinois	49,165,427	43,854,610	(5,310,817)	-10.80%
Indiana	14,202,901	15,974,117	1,771,216	12.47%
Iowa	3,306,963	4,260,746	953,783	28.84%
Kansas	3,128,980	4,031,429	902,449	28.84%
Kentucky	16,299,905	17,096,663	796,758	4.89%
Louisiana	13,800,624	14,700,737	900,113	6.52%
Maine	2,202,857	2,183,228	(19,629)	-0.89%
Maryland	14,098,161	12,575,287	(1,522,874)	-10.80%
Massachusetts	14,619,763	18,836,344	4,216,581	28.84%
Michigan	28,712,786	36,760,047	8,047,261	28.03%
Minnesota	6,580,946	6,964,044	383,098	5.82%
Mississippi	7,432,434	6,629,587	(802,847)	-10.80%
Missouri	10,789,714	13,345,683	2,555,969	23.69%
Montana	2,202,857	2,183,228	(19,629)	-0.89%
Nebraska	2,202,857	2,492,306	289,449	13.14%
Nevada	13,619,140	12,904,060	(715,080)	-5.25%
New Hampshire	2,202,857	2,183,228	(19,629)	-0.89%
New Jersey	30,376,429	27,095,187	(3,281,242)	-10.80%
New Mexico	6,764,694	6,185,280	(579,414)	-8.57%
New York	63,421,041	56,570,341	(6,850,700)	-10.80%
North Carolina	23,188,433	21,936,734	(1,251,699)	-5.40%
North Dakota	2,202,857	2,183,228	(19,629)	-0.89%
Ohio	32,932,150	37,932,499	5,000,349	15.18%
Oklahoma	6,680,103	5,958,523	(721,580)	-10.80%
Oregon	10,839,402	12,022,152	1,182,750	10.91%
Pennsylvania	36,311,530	32,389,182	(3,922,348)	-10.80%
Puerto Rico	18,141,119	16,181,527	(1,959,592)	-10.80%
Rhode Island	2,476,330	3,190,544	714,214	28.84%
South Carolina	9,817,775	12,649,383	2,831,608	28.84%
South Dakota	2,202,857	2,183,228	(19,629)	-0.89%
Tennessee	12,988,349	14,358,588	1,370,239	10.55%
Texas	81,731,170	77,453,240	(4,277,930)	-5.23%
Utah	3,108,341	3,795,012	686,671	22.09%
Vermont	2,202,857	2,183,228	(19,629)	-0.89%
Virginia	11,024,882	11,508,422	483,540	4.39%
Washington	19,669,803	17,545,084	(2,124,719)	-10.80%
West Virginia	5,239,482	4,673,517	(565,965)	-10.80%
Wisconsin	7,451,034	7,411,760	(39,274)	-0.53%
Wyoming	2,202,857	2,183,228	(19,629)	-0.89%
<b>State Total</b>	<b>881,142,622</b>	<b>873,291,300</b>	<b>(7,851,322)</b>	<b>-0.89%</b>
American Samoa	322,472	319,497	(2,975)	-0.92%
Guam	884,979	876,816	(8,163)	-0.92%
Northern Marianas	413,259	409,448	(3,811)	-0.92%
Palau	75,000	75,000	0	0.00%
Virgin Islands	512,668	507,939	(4,729)	-0.92%
<b>Outlying Areas Total</b>	<b>2,208,378</b>	<b>2,188,700</b>	<b>(19,678)</b>	<b>-0.89%</b>

U.S. Department of Labor  
Employment and Training Administration  
**WIOA Dislocated Worker Activities State Allotments**  
Comparison of PY 2026 Allotments vs PY 2025 Allotments

State	PY 2025	PY 2026	Difference	% Difference
<b>Total</b>	<b>\$1,393,378,000</b>	<b>\$1,396,161,000</b>	<b>\$2,783,000</b>	<b>0.20%</b>
Alabama	11,101,897	10,017,589	(1,084,308)	-9.77%
Alaska	5,287,961	4,771,493	(516,468)	-9.77%
Arizona	25,479,655	22,991,090	(2,488,565)	-9.77%
Arkansas	4,069,250	4,083,588	14,338	0.35%
California	206,023,191	259,233,111	53,209,920	25.83%
Colorado	12,679,156	11,440,799	(1,238,357)	-9.77%
Connecticut	10,623,875	9,586,255	(1,037,620)	-9.77%
Delaware	2,264,995	2,043,776	(221,219)	-9.77%
District of Columbia	10,879,820	9,817,202	(1,062,618)	-9.77%
Florida	37,289,765	33,647,722	(3,642,043)	-9.77%
Georgia	24,037,678	21,689,949	(2,347,729)	-9.77%
Hawaii	2,280,320	2,057,604	(222,716)	-9.77%
Idaho	2,349,731	2,573,679	223,948	9.53%
Illinois	76,440,615	68,974,760	(7,465,855)	-9.77%
Indiana	11,115,373	10,029,749	(1,085,624)	-9.77%
Iowa	4,826,678	4,750,456	(76,222)	-1.58%
Kansas	4,826,014	4,354,664	(471,350)	-9.77%
Kentucky	10,534,326	13,730,098	3,195,772	30.34%
Louisiana	13,178,385	11,891,269	(1,287,116)	-9.77%
Maine	1,824,548	1,646,347	(178,201)	-9.77%
Maryland	13,481,234	12,164,540	(1,316,694)	-9.77%
Massachusetts	17,871,146	17,787,057	(84,089)	-0.47%
Michigan	24,967,752	32,542,155	7,574,403	30.34%
Minnesota	7,689,386	7,644,784	(44,602)	-0.58%
Mississippi	10,724,038	9,676,635	(1,047,403)	-9.77%
Missouri	8,822,149	7,960,501	(861,648)	-9.77%
Montana	1,291,832	1,165,660	(126,172)	-9.77%
Nebraska	1,644,357	2,143,201	498,844	30.34%
Nevada	23,245,585	20,975,219	(2,270,366)	-9.77%
New Hampshire	1,720,155	1,837,029	116,874	6.79%
New Jersey	41,952,869	37,855,387	(4,097,482)	-9.77%
New Mexico	16,054,292	14,486,290	(1,568,002)	-9.77%
New York	91,554,591	82,612,574	(8,942,017)	-9.77%
North Carolina	18,938,010	17,088,359	(1,849,651)	-9.77%
North Dakota	962,974	868,922	(94,052)	-9.77%
Ohio	24,507,861	31,942,748	7,434,887	30.34%
Oklahoma	5,021,271	4,890,953	(130,318)	-2.60%
Oregon	8,470,128	11,039,689	2,569,561	30.34%
Pennsylvania	47,026,868	42,433,815	(4,593,053)	-9.77%
Puerto Rico	97,524,351	87,999,275	(9,525,076)	-9.77%
Rhode Island	2,807,738	2,735,625	(72,113)	-2.57%
South Carolina	9,468,429	8,543,660	(924,769)	-9.77%
South Dakota	1,043,331	941,430	(101,901)	-9.77%
Tennessee	11,648,202	10,510,537	(1,137,665)	-9.77%
Texas	67,392,496	60,810,359	(6,582,137)	-9.77%
Utah	3,775,941	4,422,155	646,214	17.11%
Vermont	806,543	727,769	(78,774)	-9.77%
Virginia	11,528,671	12,992,936	1,464,265	12.70%
Washington	25,672,738	23,165,315	(2,507,423)	-9.77%
West Virginia	8,118,689	7,325,747	(792,942)	-9.77%
Wisconsin	8,853,181	7,988,502	(864,679)	-9.77%
Wyoming	818,959	738,972	(79,987)	-9.77%
<b>State Total</b>	<b>1,092,519,000</b>	<b>1,095,349,000</b>	<b>2,830,000</b>	<b>0.26%</b>
American Samoa	508,660	509,514	854	0.17%
Guam	1,395,946	1,398,292	2,346	0.17%
Northern Marianas	651,865	652,962	1,097	0.17%
Palau	118,303	119,605	1,302	1.10%
Virgin Islands	808,671	810,030	1,359	0.17%
<b>Outlying Areas Total</b>	<b>3,483,445</b>	<b>3,490,403</b>	<b>6,958</b>	<b>0.20%</b>
<b>National Reserve</b>	<b>297,375,555</b>	<b>297,321,597</b>	<b>(53,958)</b>	<b>-0.02%</b>

U.S. Department of Labor  
Employment and Training Administration  
Employment Service (Wagner-Peyser)  
PY 2026 vs PY 2025 Allotments

State	PY 2025	PY 2026	Difference	% Difference
<b>Total</b>	<b>\$667,786,000</b>	<b>\$674,897,000</b>	<b>\$7,111,000</b>	<b>1.06%</b>
Alabama	7,958,015	7,997,315	39,300	0.49%
Alaska	7,259,152	7,336,452	77,300	1.06%
Arizona	14,020,076	14,116,534	96,458	0.69%
<b>Arkansas</b>	<b>4,951,896</b>	<b>5,114,831</b>	<b>162,935</b>	<b>3.29%</b>
California	79,957,873	80,539,150	581,277	0.73%
Colorado	12,129,654	12,205,912	76,258	0.63%
Connecticut	7,276,222	7,274,594	(1,628)	-0.02%
Delaware	1,983,351	1,986,162	2,811	0.14%
<b>District of Columbia</b>	<b>1,886,677</b>	<b>1,902,588</b>	<b>15,911</b>	<b>0.84%</b>
Florida	38,374,546	40,093,942	1,719,396	4.48%
Georgia	19,051,765	19,121,367	69,602	0.37%
Hawaii	2,649,944	2,612,505	(37,439)	-1.41%
Idaho	6,048,166	5,962,717	(85,449)	-1.41%
Illinois	26,237,816	26,194,174	(43,642)	-0.17%
Indiana	12,697,063	12,699,401	2,338	0.02%
Iowa	5,953,674	6,048,937	95,263	1.60%
Kansas	5,270,052	5,516,119	246,067	4.67%
Kentucky	8,155,470	8,207,755	52,285	0.64%
Louisiana	8,180,903	8,152,216	(28,687)	-0.35%
Maine	3,596,787	3,635,088	38,301	1.06%
Maryland	11,946,103	11,921,523	(24,580)	-0.21%
Massachusetts	14,256,605	15,045,542	788,937	5.53%
Michigan	19,347,254	19,990,873	643,619	3.33%
Minnesota	10,724,779	11,102,842	378,063	3.53%
Mississippi	4,889,039	4,871,528	(17,511)	-0.36%
Missouri	11,236,561	11,428,433	191,872	1.71%
Montana	4,942,591	4,995,223	52,632	1.06%
Nebraska	4,232,224	4,172,430	(59,794)	-1.41%
Nevada	6,837,109	6,869,366	32,257	0.47%
New Hampshire	2,548,108	2,583,095	34,987	1.37%
New Jersey	18,907,345	19,098,199	190,854	1.01%
New Mexico	5,546,459	5,605,521	59,062	1.06%
New York	38,705,830	38,561,423	(144,407)	-0.37%
North Carolina	19,167,523	19,227,358	59,835	0.31%
North Dakota	5,033,038	5,086,633	53,595	1.06%
Ohio	22,277,650	22,674,878	397,228	1.78%
Oklahoma	6,958,574	6,992,128	33,554	0.48%
Oregon	8,374,612	8,612,312	237,700	2.84%
Pennsylvania	24,979,701	24,932,697	(47,004)	-0.19%
Puerto Rico	5,611,115	5,542,591	(68,524)	-1.22%
Rhode Island	2,254,255	2,267,618	13,363	0.59%
South Carolina	9,356,205	9,584,392	228,187	2.44%
South Dakota	4,651,684	4,701,218	49,534	1.06%
Tennessee	12,282,147	12,348,295	66,148	0.54%
Texas	57,857,868	58,296,340	438,472	0.76%
Utah	6,209,916	6,310,448	100,532	1.62%
Vermont	2,179,113	2,202,318	23,205	1.06%
Virginia	15,685,643	15,824,651	139,008	0.89%
Washington	15,608,727	15,662,754	54,027	0.35%
West Virginia	5,324,312	5,381,009	56,697	1.06%
Wisconsin	10,977,975	10,993,005	15,030	0.14%
Wyoming	3,609,003	3,647,434	38,431	1.06%
<b>State Total</b>	<b>666,158,170</b>	<b>673,251,836</b>	<b>7,093,666</b>	<b>1.06%</b>
Guam	312,473	315,800	3,327	1.06%
Virgin Islands	1,315,357	1,329,364	14,007	1.06%
<b>Outlying Areas Total</b>	<b>1,627,830</b>	<b>1,645,164</b>	<b>17,334</b>	<b>1.06%</b>