

Policy Area: Governance and Administrative Standards	
Title: Provision of Career Services	Number: GAS-PCS-25-V1
Effective Date: January 02, 2026 Review by Date: January 02, 2027	Approved by: <i>Scott Adkins</i>
Revision Date(s):	Approval Date: 2026-01-08

PURPOSE

The purpose of this policy is to establish clear guidance for the provision, oversight, and authorization of the Workforce Innovation and Opportunity Act (WIOA) Title I career services within each Local Workforce Development Area. It ensures compliance with federal and state requirements and outlines the process for Local Workforce Development Boards (LWDBs) to obtain authorization from the Governor, through the State Workforce Development Board (SWDB), to directly provide career services when necessary and appropriate.

It is the policy of the State of West Virginia that all LWDBs ensure WIOA career services are delivered through the one-stop delivery system in accordance with WIOA and related state guidance.

This policy supersedes all prior guidance related to the provision of career services, including WIOA Guidance Notice 01-17.

REFERENCES

- Workforce Innovation and Opportunity Act, Sec. 107, Sec. 108, Sec. 134
- 20 CFR Parts 678, 679, and 680

BACKGROUND

Career services under WIOA are designed to support individuals in achieving sustainable employment, career advancement, and self-sufficiency through an integrated system of workforce, education, and support services. LWDBs are responsible for ensuring that all required WIOA career services—basic, individualized, and follow-up—are made available and accessible through the local one-stop delivery system, consistent with WIOA Sec. 134 and 20 CFR 678.

SCOPE

This policy applies to:

- LWDBs and their staff;
- The One-Stop Operator and all WIOA Title I service providers within each local area; and
- Any entity seeking or approved to directly provide WIOA career services.

Career services must be provided through the local one-stop delivery system. Services may be delivered by the one-stop operator or competitively procured providers. Direct provision by the LWDB may occur only with the approval of the Chief Elected Official (CEO) and the Governor, in accordance with WIOA Sec. 107 and 20 CFR 679.

DEFINITIONS

- **Calendar Year (CY):** The 12-month period from January 1 through December 31. Quarters are defined as Q1 (Jan–Mar), Q2 (Apr–Jun), Q3 (Jul–Sep), and Q4 (Oct–Dec). *Used to align LWDB authorization timelines with the SWDB meeting schedule.*
- **Career Services:** Services described under WIOA Sec. 134 and 20 CFR 678, including basic, individualized, and follow-up services.
- **Direct Provision:** Delivery of WIOA career services by LWDB staff rather than through contracted providers or the one-stop operator.
- **Internal Controls:** Documented policies, procedures, and systems implemented to ensure the integrity, transparency, and accountability of all financial and programmatic operations, including segregation of duties, review, and approval processes.
- **Program Year (PY):** The twelve-month period beginning July 1 and ending June 30, used for federal reporting and planning under WIOA.
- **Standard Operating Procedure (SOP):** A written internal procedure developed and maintained by the LWDB to ensure consistent implementation of this policy.
- **WIOA State Plan:** 4-year strategic framework that outlines the Governor's vision for the state's workforce system and governs the administration of federal funds.
 - **Full Planning Cycle:** A complete strategic overhaul. Establishes a new 4-year vision, economic analysis, and operational goals.
 - **2-Year Modification:** A mandatory update to the 4-year plan. Adjusts strategies based on performance data, economic shifts, or legislative changes.

ROLES & RESPONSIBILITIES

- **Local Workforce Development Board (LWDB)**

Each LWDB seeking authorization to directly provide basic and/or individualized career services and follow-up services must:

- **Develop and maintain a documented approach** (e.g., Standard Operating Procedure) Outlining how the LWDB will ensure compliance with the state's requirements and the established submission timeline.
- **Define internal timelines** that start at a minimum in Q3 to guarantee the submission of all required documentation to WorkForce West Virginia (WFWV) by the October 31st deadline.
 - LWDB internal timelines **must** incorporate a defined contingency or grace period to ensure the October 31 submission deadline is met, as **the State will not extend its timelines** due to timing constraints between scheduled SWDB meetings and the local areas' need to receive determinations prior to the start of their strategic planning activities.

Example:

Process Start: July 1st (aligning with the start of Q3).

Internal Completion Deadline: September 30th, allowing a 90-day window for drafting, internal review, and ensuring a timely submission to WFWV.

Contingency/Emergency Period: A four-week buffer, through October 30th, reserved to resolve unforeseen issues or delays, guaranteeing submission by the final State deadline.

- **Assign responsibility** for oversight, documentation, and submission to designated LWDB staff to ensure accountability and completion.
- **Prepare and submit** all required documentation, as outlined in the Request for Authorization form, including the justification, service description, evidence of capacity, performance data, testimonials, and the signed CEO approval letter.
- **Retain all supporting materials and correspondence** related to the request for state and federal compliance review.

- **WorkForce West Virginia (WFWV)**

The State Workforce Agency is responsible for:

- **Providing technical assistance** to LWDBs regarding policy interpretation, documentation requirements, and submission procedures.
- **Receiving and reviewing** all LWDB submissions for completeness and compliance prior to presentation to the SWDB.

- **Maintaining records** of all submissions, determinations, and communications related to LWDB career service authorization requests.
- **Notifying LWDBs and CEOs** in writing of the SWDB's determination following the board vote.
- **State Workforce Development Board (SWDB)**
The SWDB, under the authority of the Governor, is responsible for:
 - **Reviewing all LWDB requests** and supporting documentation to determine whether the LWDB meets the criteria under WIOA Sec107 and 20 CFR 679.
 - **Evaluating justification and supporting evidence** to ensure the LWDB demonstrates capacity, effectiveness, and the necessity for direct provision of career services.
 - **Issuing a formal determination** approving or denying the LWDB's request to directly provide career services.
 - **Documenting and recording** all determinations and maintaining them as part of the official record.
 - **Communicating decisions** to the SWA and the requesting LWDB to ensure timely inclusion in the LWDB's local strategic plan, as required under WIOA Section 108.
 - **Ensuring transparency and compliance** with all state and federal requirements related to the direct provision of services by a LWDB.

TYPES OF CAREER SERVICES

- **Basic Career Services** (*Per WIOA Sec 134 and 20 CFR 678*)

Basic career services must be made available to all participants and include, at a minimum:

- **Eligibility Determinations:** Assess whether individuals are eligible for Adult, Dislocated Worker, or Youth programs.
- **Outreach, Intake, and Orientation:** Provide access to information and services available through the one-stop delivery system, including TANF application assistance.
- **Initial Assessment:** Evaluate skill levels (literacy, numeracy, English proficiency), aptitudes, abilities, and supportive service needs.
- **Labor Exchange Services:** Offer job search, placement assistance, and career counseling, including guidance on in-demand industries and nontraditional employment.
- **Employer Services:** Provide recruitment and other business services, including referrals to specialized programs.
- **Referrals and Coordination:** Connect individuals to programs and services within the one-stop system and other workforce development programs.
- **Labor Market Information:** Supply local, regional, and national labor market data, including job vacancies, skill requirements, and career pathways.

- **Program Performance and Cost Information:** Share performance data and costs for eligible providers of education, training, and workforce services.
- **Supportive Services Information:** Provide guidance and referrals for supportive services such as childcare, medical assistance, SNAP, TANF, transportation, and other benefits.
- **Unemployment Insurance Assistance:** Provide meaningful assistance in filing claims, either on-site or via phone/technology, using trained staff.
- **Financial Aid Guidance:** Assist with eligibility for training or education programs not provided under WIOA.

- **Individualized Career Services** (*Per WIOA Sec 134 and 20 CFR 678*)
Individualized career services must be offered when necessary to help an individual obtain or retain employment. These include:
 - **Comprehensive Assessments:** In-depth evaluation of skills, employment barriers, and service needs using diagnostic tools and interviews.
 - **Individual Employment Plan (IEP):** Identify employment goals, objectives, and service strategies, including information about eligible training providers.
 - **Counseling Services:** Individual and group counseling, career planning, and guidance.
 - **Pre-vocational Services:** Short-term training for job readiness, including communication, interviewing, punctuality, and professional skills.
 - **Work Experiences:** Internships, work-based learning, and career-linked experiences.
 - **Workforce Preparation Activities:** Training to enhance employment readiness.
 - **Financial Literacy Services:** As described in WIOA Sec. 129.
 - **Out-of-Area Job Search and Relocation Assistance**
 - **English Language and Integrated Education & Training Programs**
- **Follow-up Services** (*Per WIOA Sec. 134 and 20 CFR 678*)
Follow-up services must be provided as appropriate for up to 12 months after placement in unsubsidized employment and may include:
 - Counseling regarding the workplace and job retention strategies
 - Additional guidance or referrals to supportive services

Policies on follow-up services:
Adult and Dislocated Worker Follow-up
Youth Follow-up

AUTHORIZATION TO PROVIDE CAREER SERVICES

Pursuant to **WIOA Sec. 107** and **20 CFR 679**, a Local Workforce Development Board may serve as a provider of career services only with the express agreement of the Chief Elected Official (CEO) and the Governor. In West Virginia, the Governor's State Workforce Development Board is the body responsible for reviewing these requests and rendering a final determination of approval or denial.

- **Step 1: Planning Alignment and Timeline**

Under WIOA Sec. 108, Local Workforce Development Boards must outline their service delivery strategy—including any intent to provide career services directly—within their four-year Local Strategic Plan and subsequent two-year modifications. Authorization is temporary and must be renewed every two years to align with these planning cycles.

The following timeline applies to all LWDBs seeking direct service authorization:

- **Initiation Requirement:**

- LWDBs must initiate the request process during **Quarter 3** (July–September) of the calendar year (**CY**) preceding the next plan or modification cycle.

- **Submission Deadline:**

- All required documentation must be submitted to WFWV no later than **October 31** of that calendar year. This deadline ensures sufficient time for state-level review and placement on the agenda for the fourth-quarter (**Q4**) meeting of the SWDB.

- **Illustrative Example (Two-Year Modification Cycle):**

- For a Local Strategic Plan covering the period ending June 30, 2028, the authorization process for the mid-cycle modification would follow this schedule:
 - **July–September 2025:** Initiate the authorization process.
 - **October 31, 2025:** Deadline to submit all documentation to WFWV.
 - **July 1, 2026:** Upon approval, authorization takes effect for the remainder of the plan period (July 01, 2026 – June 30, 2028)

- **Step 2: Submission of Request**

The LWDB must submit a **Request for Authorization to Provide Career Services (Attachment A)** form to WFWV.

- The request must include:

- Completed authorization request form.
- Supporting documentation as outlined in items 1-4 on the Authorization Request Form.

- Request and documentation **must** be submitted by October 31, to WFWV via:
 - **Email:** wioa@wv.gov
 - **or**
 - **Mailing Address:**

WorkForce West Virginia
c/o Workforce Development Director
1900 Kanawha Blvd E, Bldg 3, Suite 400
Charleston WV 25305
- **Step 3: WFWV Review and State Submission**

WFWV must serve as the primary reviewing body for all submissions. This review process must include:

 - **Compliance Audit:** Verification that the request meets all state requirements.
 - **Documentation Compilation:** Assembly of the final administrative record, including any supplemental information required by the SWDB.
- **Step 4: SWDB Review, Decision and Notification**
 - **Board Evaluation and Voting:**

The SWDB must conduct a formal review of the LWDB request during the Q4 meeting. The Board's decision to approve or deny must be predicated upon:

 - **Capacity:** The LWDB's demonstrated ability to effectively manage the requested services.
 - **Justification:** The necessity of the request as supported by the documentation.
 - **Legal Compliance:** Strict adherence to WIOA Sec. 107 and 20 CFR 679.
 - **Official Notification Process:**
 - **Certification:** Following the Board's decision, the SWDB Chair, Vice Chair, or Acting Chair must issue a signed WV SWDB Response Letter (Attachment B) to WFWV.
 - **Transmittal:** WFWV must serve as the official agent for disseminating the notice of approval or denial to the LWDB and the respective CEO.
 - **Sequencing and Compliance**

No LWDB must implement the direct provision of career services, nor include such services in their local four-year strategic plan, until a formal approval notice has been issued and received.

INTERNAL CONTROLS AND FIREWALLS

The LWDB must maintain written policies specifying internal controls and firewalls to safeguard the integrity of career service delivery.

RECORD RETENTION

All records must be maintained and retained for a minimum of three (3) years, unless a longer period is required due to audit, review, investigation, or legal action. In such cases, records must be retained until all matters are fully resolved and official notice is given that normal retention periods may resume.

Version Control

Version #	Effective Date	Description of Changes	Author/Editor	Approval Date
1.0	December 04, 2025	<i>Updated provision on career services to align with the new system, sunset WIOA Guidance Notice 01-17, and establish LWDB authorization process for direct provision of career services.</i>	WorkForce Unit	2026-01-08

Request for Authorization to Provide Career Services

Date:

Local Workforce Development Board:

Contact Person/Title:

Phone:

E-mail Address:

Mailing Address:

Please select the type of services for which Governor's approval is being requested (check all that apply):

Basic Career Services **Individualized Career Services** **Follow-Up Services**

1. What factors influenced the LWDB's decision to request approval to directly provide basic and/or individualized career services?
 - *Explain why the LWDB determined that participants would be better served through direct provision rather than through a competitive procurement process.*
2. Describe the basic and/or individualized career services the LWDB plans to provide.
 - *Include details about the LWDB's prior experience delivering these services and how long it has been providing them.*
3. Provide evidence that the LWDB is qualified to directly provide basic, individualized, and/or follow-up career services.
 - *Include any local testimonials, performance data, or other documentation that demonstrate the LWDB's effectiveness and efficiency in delivering these services. Attach supporting materials as appropriate.*
4. Attach a signed and dated letter from the local Chief Elected Official confirming review and approval of this request, based on the information provided in items 1–3 above.

Submit the completed request by email or mail to the following address:

Email: wioa@wv.gov

Mail: WorkForce West Virginia
% Workforce Development Director
1900 Kanawha Blvd. E, Bldg. 3, Suite 400
Charleston, WV 25305

[Date]
[To: Name/Title]
[Organization Name]
[Address]

Dear [Name],

The Workforce Innovation and Opportunity Act (WIOA) mandates the delivery of career services (both basic and individualized) and follow-up support through a One-Stop delivery system, allowing for flexibility in service provision among different entities.

In accordance with WIOA Section 107(g)(2), *“A local board may provide career services described in section 134(c)(2) through a one-stop delivery system, or be designated or certified as a one-stop operator, only with the agreement of the chief elected official in the local area and the Governor.”*

Per WIOA Section 108(b)(4), each Local Plan must include “a description of the strategies and services that will be used in the local area.” Therefore, the approved service delivery strategy must be incorporated into your Local Plan. Waivers are valid only for the duration of the Local Plan period for which they are approved, *with a maximum validity of two years*. Any subsequent requests for waiver renewal must be submitted and approved prior to the development and submission of the next Local Plan.

The request from **[Local Workforce Development Board Name]** to directly provide WIOA Career Services has been reviewed. Based on the information provided, the West Virginia State Workforce Development Board has determined that the waiver **[is/is not]** approved for **[Entity Name]** to directly provide WIOA Career Services from **[Start Date]** through **[End Date]**.

If you have any questions or require additional information, please contact **[Director’s Name, Title]** at **[Email Address]** or **[Phone Number]**.

Sincerely,

[Name]
WV State Workforce Development Board
[Chair, Vice Chair, or Acting Chair]

WIOA Section 107(g)(2), 108(b)(4)

20CFR 679.410(b)

WFWV Provision of Career Services : GAS-PCS-25-V1