

**Guidance for Program Year 2026 MOU
Negotiations Under WIOA**

**Draft for Feedback
November 2025**

Guidance for Program Year 2026 MOU Negotiations Under WIOA

Purpose of the PY 2026 MOU Guidance	This annual guidance is issued to support negotiations of memoranda of understanding (MOUs) between required partners under the federal Workforce Innovation and Opportunity Act (WIOA) of 2014. Per WIOA, the MOU must reflect each required program partner’s human and financial commitments to make their services accessible and to share in the cost of operating the local workforce delivery system. This includes required Infrastructure Funding Agreements to operate the physical comprehensive one-stop centers, affiliate centers and specialized centers within a local workforce area. This annual guidance applies to MOU negotiations that will occur between January 2026 and June 2026, resulting in an MOU that takes effect July 1, 2026 (Program Year 2026 / State Fiscal Year 2027). This annual guidance supplements—and does not change—the current, overarching, authoritative “Governor’s Guidelines to State and Local Program Partners Negotiating Costs and Services under WIOA.”
Guidance Specific to PY 2026 MOU Narratives	1. No changes for the MOU Template for Program Year 2026. The MOU Template remains the same as Program Year 2025. While the template is unchanged, local areas should begin with a new MOU Narrative template for PY 2026, as this marks the start of a new three-year cycle rather than revising prior versions. 2. MOU Narrative Assistance. Although the MOU Template was not updated this year, the following items are offered as reminders to assist in the completion of the MOU Narrative: a) Ensure that the requirements around the staffing plan are included for all partners in section 7 of the MOU: i. Describe if services will be provided via On-site, Direct linkage, Cross Training, or Contract provider. ii. How services will be made available in real time during regular business hours. iii. If direct linkage is the method of delivery, include how these services will be provided (e.g. – phone line, email, voicemail, Zoom/Skype, etc.).

	b) Ensure that the One-Stop Operator content is provided in section 10 of the MOU and that it aligns to the budget spreadsheet: iv. Name the procured one-stop operator and identify the one-stop operator model (single entity or consortium). v. Describe the payment provisions for the one-stop operator (term, frequency, and method). vi. Include the total cost of the one-stop operator, the partners contributing to that cost, and the method those partners are making their contributions (cash, non-cash, third-party in-kind). c) <i>Attachment H – Cover Page for MOU Submittal</i> should not be included with the MOU narrative for PY2026 because this is the start of a new, 3-year MOU. Cover pages are only required during amendment years.
	3. Appendix I - Required Checklist for Local Partner Service Delivery via Direct Linkage. Direct Linkage Checklists will not be required to be submitted as an attachment with the Program Year 2026 MOU Narrative. Local areas are still required to complete the checklist and submit to their MOU Negotiator. The checklist is available for download on the WIOA Implementation Portal and is listed as Appendix I - Required Checklist for Local Partner Service Delivery via Direct Linkage.
Guidance Specific to PY 2026 MOU Budgets	4. Budget Spreadsheet Assistance. The Budget Spreadsheet remains the same as Program Year 2025. The following items are offered to assist in the completion of the MOU budgets: a) One Stop Operator (OSO) contract start and end dates must be updated with the accurate dates. b) Payees must be listed in the Budget next to every row item where an amount is listed (column C). c) The One-Stop Operator model must be selected (“D-Shared Costs-Center 1” tab cell B76) in the Budget and match what is listed in section 10 (Procurement of One-Stop Operator) of the MOU Narrative. d) Details must be listed and match between the Budget and MOU related to which partners are making contributions to the OSO and if payments will be cash, non-cash, or in-kind.

	e) For each partner, the first column of the Variance Table must use the total of all cash contributions from the all centers tab in the Budget.
Best Practices	5. Best practice with clear documentation of contributions. Local areas should ensure that all in-kind and non-cash contributions are fully negotiated, documented, and that their values are agreed upon by all partners. This helps ensure transparency and provides a clear record in the event of an audit, making it easy to demonstrate how amounts were determined and allocated. Example: Reporting One-Stop Operator Contributions appropriately in rows 89-91 in the “D-Shared Costs Center 1” tab of the Budget Spreadsheet rather than including all service delivery contributions in rows 84-86 of the same tab in the Budget Spreadsheet. Best practice for submitting MOU Narrative. Local areas are encouraged to provide all partners drafts of the MOU Narrative as a Microsoft Word document with the track changes feature enabled throughout the negotiation process. This will help expedite fiscal and legal reviews in state agencies.
PY 2026 MOU Timeline Guidance	6. Final MOU Submittal Due Date is May 29. Local workforce board chairs and CEOs must submit a signed MOU and one-stop operating budget by May 29, 2026. This timeline helps required partners comply with signature requirements by the Illinois Office of the Comptroller.
PY 2026 MOU Signature Guidance	7. Requirements for using electronic signatures and other Signature Guidance. Although the requirements have not changed since Program Year 2025, the State repeats the requirements for using electronic signatures as a reminder. The Illinois Office of the Comptroller has modified its procedures to allow for the submission of contract and grant obligation related documents containing electronic signatures as defined by the Electronic Commerce Security Act (5 ILCS 175). The WIOA Interagency Technical Assistance Team, which reviews and approves MOUs, recommends that local workforce areas and required program partners continue to provide physical ink

signatures in PY 2026. The submission of physical ink signatures ensures that processes and payments will not be delayed.

Requirements for using electronic signatures:

- a) Complete and submit a new SCO-470 Contract Signature Authorization Form, which has been updated to include an electronic signature sample on the Specimen Signature (field #5).
 - i. The Agency Head approval signature on the Contract Signature Authorization Form (line 8), must be in wet ink, regardless of the type of signature supplied on the specimen signature line (line 5).
- b) Check the box next to “Specimen signature is electronic.”
- c) Designees must also submit a new Contract Signature authorization Form to use for the documents.
 - i. The electronic designee signature must incorporate signatures of both the Agency Head and the authorized designee.

The Illinois Comptroller’s Office does not require a specific electronic signature format. The selection and format of electronic signatures is the agency’s decision but must comply with the requirements of the Electronic Commerce Security Act.

By submitting an agency-approved Contract Signature Authorization Form, the agency is certifying that it has adequate processes and written procedures governing its use of electronic signatures, ensuring compliance with the Act.

This guidance is effective on April 1, 2021, for documents executed on or after April 1, 2021, provided the agency’s new Contract Authorization Form is on file with the Illinois Comptroller’s Office.

The Comptroller’s Office encourages agencies to utilize electronic submission for contracts, grants, and obligations-related documents signed electronically. Prior to electronic submission of documents, agencies must sign a Memorandum of Understanding with Illinois Office of the Comptroller and submit test documents to the Comptroller’s Office to verify that the documents submitted are in an acceptable format. Electronic document requirements include the following:

	d) Optical character recognition (OCR). e) Maximum file size of 25 MB. f) 200 dpi minimum. MOU Signature pages must spell out any acronyms when they are used on the Title or Organization lines. The comptroller's office will not accept MOU Signature pages that have acronyms listed. Dates must be included anytime there is a signature and must be from 2026.	
Summary Timeline for PY 2026 MOU Submittals	December 31, 2025	Deadline to submit the "Pre-Program Year Planning Form" to outline work plans for PY 2026 negotiations.
	January 2026	PY 2026 MOU negotiations begin.
	April 15, 2026	Deadline to submit the "Report of Outcomes" and a draft one-stop operator budget as a status report to the WIOA Interagency TA Team.
	May 29, 2026	Deadline to submit final, agreed-upon MOUs.
	July 1, 2026	PY 2026 MOUs take effect.
Effective date	This guidance is effective as of the date of issuance. This guidance will be updated as needed.	
Contact Information	Any questions about this PY 2026 MOU Guidance should be directed to the WIOA Interagency Technical Assistance (TA) Team or the primary contact for each required program partner. Questions may be emailed to wioaplan@illinoisworknet.com .	
Attachments	In conjunction with this PY 2026 MOU Guidance, the following documents are available for download on the WIOA Implementation Portal and the WIOA ePolicy Manual and specific to PY 2026. 1. Appendix 1b – Signature Pages for Submittal of MOUs and One-Stop Operating Budgets 2. Attachment H – Cover Page for MOU Submittal (not required for PY2026) 3. Appendix J – MOU Template (unchanged from PY2024) 4. Appendix K – One-Stop Operating Budget Spreadsheet (unchanged from PY 2024) All other forms issued as part of the Governor's Guidelines – Revision 4 remain unchanged, active and available for download.	