

**Northwest TN Workforce Board**  
**Executive Committee**  
October 28, 2020 – 10:00 a.m.  
Zoom Meeting

Minutes

**Committee Members Attending:** Rita Alexander, Neely Ashby, Brad Hurley, Ben Marks, Ted Piazza, Mayor Gary Reasons, Jimmy Williamson, Mayor Chris Young

**Staff Members Attending:** Jennifer Bane, Lana Burchfiel, Gina Johnson, LeAnn Lundberg, Ginger Powell, Laura Speer

**Welcome and Call to Order:** Ted Piazza welcomed everyone and confirmed that a quorum was present.

**Review and Approval of Minutes:** Minutes for the July 29, 2020 Executive Meeting were reviewed.

- **MOTION:** Jimmy Williamson moved to approve the 7-29-20 Executive Committee minutes as presented and Brad Hurley seconded the motion. All were in favor and the motion carried.

**Facilities and Technology Update:** LeAnn Lundberg provided the following information:

- **ADA Survey Results Updates:** Dyersburg State Community College has volunteered to paint the lines at the AJC Dyersburg office. LeAnn is still trying to find someone to do the spaces in the back-parking lot for Obion County, which actually belongs to the bank.

**Performance & Program Oversight:** Laura Speer presented the following reports:

- **Quarterly Complaint Logs Update:** The logs have been submitted with no complaints.
- **Monitoring Status Report:** The attached report details the monitoring that has been completed. There have not been any issues.
  - **One-Stop Operator (OSO) & Career Service Provider (CSP) Monitoring Results:** We have completed OSO and CSP 6-month reviews, and both have passed. Overall CSP Dyersburg State Community College did meet the total enrollment goal, but not the youth goal, due partly to the decrease between April-June due to Covid. They have increased their enrollments this past quarter. The main issue with the OSO was regarding traffic. April through June we didn't really see anyone in the AJCs, and they are still trying to provide services by phone if possible, so our traffic is down. We are asking OSO for alternative ways to track outreach and services provided by phone since the state doesn't want us to use the VOS greeters unless they are actually there in person. Co-Enrollments between RESEA and Title I are also down since RESEA is just getting started back up since being suspended in April. The Data validation information is the same as last time since we haven't had another monitoring yet. Overall, we are very pleased with both of them. Brad Hurley inquired about updated signage for the AJCs to help with the promotion. Jennifer stated they had originally wanted the digital signs and we were waiting on funding, but we may need to go ahead and do regular signs on our own budget. She will check with the state. **Note: Incorrect enrollment numbers were originally included in the CSP monitoring handout. The corrected numbers are included in the handouts posted with the minutes.**
- **Local Performance-Estimated PY 20 Q1 Results:** Estimated results show we are exceeding all performance measures for the rolling four quarters. On the handout for just first quarter there are four areas that are below 90%, but we should be at or exceeding once everything is completed. Jennifer said we do have a median earnings goal for the youth program that is new this year. Wages are our hardest measure to meet since we have no control over that.

**Budget & Administration Update:**

- **Financial Status Report:** Gina Johnson presented the attached Financial Status Report as of September 30th. We have expended 22.32% of our program funds on participants and expended 66.84% of our total formula

program funds. We have met and exceeded the requirements for Out-of-School Youth and work experience expenditures, and are on track to meet obligation rates. Our minimum participant cost rate (MPCR) was below 40% this quarter due to not all of fall training costs being reflected on September reports, but we expect to meet 40% for the year, even though the rate has been waived this year. Ted asked about our administrative costs versus participant expenditures, which Jennifer Bane answered by going over the Budget Update handout.

- **Budget Update:** Jennifer Bane reviewed the attached report, showing where we are since July. Our participant expenses for formula funds, not including extra grants, was about 14% of our budget. We were below budget on our program operating costs at 19% and our on track with our administrative costs at 25%. Our operating costs were slightly below budget for Adult and Dislocated Worker at 21% of the budget and Youth was slightly over at 26% of the budget.

**Other:** Jennifer Bane presented the following:

- **Draft State Workforce Board Policies:** Four policies will be reviewed at the November 13<sup>th</sup> State Workforce Board meeting: Monitoring, Data Validation, Grievance & Complaint Resolution, and Pre-Apprenticeship. Once approved we will review our policies to make sure they are in compliance and match what they are requiring of us. Under the monitoring policy, we will be receiving a template for quarterly reporting, which will include additional information from what we are currently submitting. The data validation policy mostly outlines the current process but we did question the number of staff required to participate and what would be considered a high error rate. Smaller areas like ours may have difficulty meeting a large number of staff to send to annual training, and error rates may be high if sample sizes are small. The Grievance and Complaint resolution policy outlines processes for addressing complaints including those made by staff within the LWDA against other LWDA or contractor staff. The Pre-Apprenticeship policy is brand new and outlines the process for employers or others who have pre-apprenticeship programs to go through in order to have their program certified by the state staff as conforming with federal requirements. It appears to be optional. J Paul Jackson with Excel Boats has been added to the State Workforce Board, so we are excited to have someone representing Northwest TN back on the board.
- **Targets for Key Performance Indicators (KPIs):** The attached report details local results through September. State results became available after the handouts were sent and mostly matched our numbers with the exception of a few that they had higher, most likely due to running reports at a later time. Numbers were down between April and June but we have seen an increase in almost all programs between July and September. This was the same across the state. We are on track to meet the goal for Adult and Dislocated Worker enrollments, but the Youth goal still lags behind even with the 3<sup>rd</sup> quarter goal being exceeded. When Covid happened was when we would have typically enrolled a lot of youth for some work experience enrolled. Wagner Peyser enrollments are back up some but the total still lags behind the goal. RESEA was suspended so we did not see an increase this quarter. SNAP enrollments have been up, so their funds are getting tight. TAA co-enrollments are up to 23.4% from 1.7% at the beginning of the year, but the goal is 50%. Jobs for Veterans were low and SCSEP did not have any exits. We aren't quite where we want to be, but we did see a lot of improvement this quarter.

**Future Meeting Dates & Upcoming Events:**

- State Board Meeting: November 13<sup>th</sup> (YouTube)
- Next Board Meeting: November 17<sup>th</sup> (Zoom)
- Proposed 2021 Committee Meeting Dates: Wednesday, 10:00 am –
  - January 27<sup>th</sup>, April 28<sup>th</sup>, July 28<sup>th</sup>, October 27<sup>th</sup>
- 2021 Board Meeting Dates: Tuesday, 11:30 am / 12:00 pm –
  - February 23<sup>rd</sup>, May 19<sup>th</sup>, August 24<sup>th</sup>, November 16<sup>th</sup>

Respectfully submitted,

Lana Burchfiel, Public Information Specialist

**Northwest TN Workforce Board  
Executive Committee**

October 28, 2020 – 10:00 a.m.

Join Zoom Meeting:

<https://us02web.zoom.us/j/84281243258?pwd=eXA5WHJCSGY5M3R1SXRFRQ9QY3FNQT09>

Meeting ID: 842 8124 3258

Passcode: 070045

**Agenda**

- |   |                               |
|---|-------------------------------|
| Welcome and Call to Order   | Ted Piazza, Chair             |
| Review and Approval of Minutes of 7-29-20 Meeting <b>(Vote Required)</b>  |                               |
| Facilities and Technology Update  | LeAnn Lundberg                |
| <ul style="list-style-type: none"><li>• ADA Survey Results Updates</li></ul>  |                               |
| Performance & Program Oversight   | Laura Speer                   |
| <ul style="list-style-type: none"><li>• Quarterly Complaint Logs Update</li><li>• Monitoring Status Report<ul style="list-style-type: none"><li>○ One-Stop Operator &amp; Career Service Provider Monitoring</li></ul></li><li>• Local Performance – Estimated PY 20 Q1 Results</li></ul>   |                               |
| Budget & Administration Update  |                               |
| <ul style="list-style-type: none"><li>• Financial Status Report</li><li>• Budget Update</li></ul>   | Gina Johnson<br>Jennifer Bane |
| Other   | Jennifer Bane                 |
| <ul style="list-style-type: none"><li>• Draft State Workforce Board Policies<ul style="list-style-type: none"><li>○ Monitoring, Data Validation, Grievance &amp; Complaints, Pre-Apprenticeship</li></ul></li><li>• Targets for Key Performance Indicators (KPIs)</li></ul>   |                               |
| Future Meeting Dates & Upcoming Events  |                               |
| <ul style="list-style-type: none"><li>• State Board Meeting: November 13<sup>th</sup> (YouTube)</li><li>• Next Board Meeting: November 17<sup>th</sup> (Zoom)</li><li>• Proposed 2021 Committee Meeting Dates: Wednesday, 10:00 am –<ul style="list-style-type: none"><li>○ January 27<sup>th</sup></li><li>○ April 28<sup>th</sup></li><li>○ July 28<sup>th</sup></li><li>○ October 27<sup>th</sup></li></ul></li><li>• 2021 Board Meeting Dates: Tuesday, 11:30 am / 12:00 pm –<ul style="list-style-type: none"><li>○ February 23<sup>rd</sup>? (State Board pushed to 3/26)</li><li>○ May 19<sup>th</sup></li><li>○ August 24<sup>th</sup></li><li>○ November 16<sup>th</sup></li></ul></li></ul> |                               |

## Northwest TN Workforce Board

### Executive Committee

July 29, 2020 – 10:00 a.m.

Join Zoom Meeting:

<https://us02web.zoom.us/j/84076994716?pwd=NytpaWRKZWVGNYtoUHBSenVBMm1lZz09>

### Minutes

**Committee Members via zoom/phone:** Ted Piazza, Ben Marks, Jimmy Williamson, Rita Alexander, Neely Ashby, Mayor Chris Young, Mayor Gary Reasons

**Staff Members zoom/phone:** Jennifer Bane, Ginger Powell, Lana Burchfiel, Gina Johnson, LeAnn Lundberg

**Others via zoom/phone:** Kristie Bennett

**Welcome and Call to Order:** Ted Piazza welcomed everyone and confirmed that a quorum was present.

**Review and Approval of Minutes:** Minutes for the 4-29-20 Executive Meeting were reviewed.

- **MOTION:** Gary Reasons moved to approve the 4-29-20 Executive Committee minutes as presented and Jimmy Williamson seconded the motion. All were in favor and the motion carried.

**Facilities and Technology Update:** LeAnn Lundberg provided the following information:

- Crockett County American Job Center (AJC) ADA Survey Results: The report is included in the attached handouts. Additional van accessible parking is needed and LeAnn is working with the landlord on this.
- Certification of American Job Centers: Certification of the Dyer, Gibson, and Obion County AJCs, were due for renewal. The only main issues involve adding van accessible parking in Dyer and Obion counties, and LeAnn is working with the landlords on this. Jennifer Bane added that Dyer County has the correct signage but they need permanent signage. Obion County still needs updated signage. We are waiting on funding for this. Ted Piazza asked about the facility cleaning to reopen centers after COVID exposure. We had them all sprayed with disinfectant prior to reopening, and then on Monday the Dyersburg office was sprayed again and was reopened today. We are cleaning between customers, screening staff and customers, and if there is a positive case we will have disinfectant sprayed again before the site reopens.
  - **MOTION:** Gary Reasons moved to approve the certification of the Dyer Comprehensive, Gibson Affiliate, and Obion Affiliate AJC's as presented, and Jimmy Williamson seconded the motion. All were in favor and the motion carried.

**Performance & Program Oversight:** Jennifer Bane presented for Laura Speer the following reports:

- Quarterly Complaint Logs Update: The logs have been submitted with no complaints.
- Monitoring Status Report: The attached report details the monitoring that has been completed. There have not been any issues.
  - One-Stop Operator (OSO) & Career Service Provider (CSP) Monitoring Results: The OSO and CSP continue to be monitored monthly and there have not been any serious issues since the last 6-month review in March. We were already going to adjust the visit goals for the OSO contract due to some sites having reduced hours, and then we lost a whole quarter due to COVID, so the goals were adjusted for that as well. When we adjusted the goals, they were at about at least 80% of the goal for most offices except Lake County. We gave them some minor suggestions to work on as well. The CSP's youth continue to be down, but we are working with them on improvement.
- Local Performance: We should get official results in mid-August. The estimated PY 19 Q4 results, as shown in the attached handout, indicate we are meeting and exceeding our goals.

### **Budget & Administration Update:**

- Financial Status Report: Gina Johnson presented the attached Financial Status Report as of June. Gina will issue a revised final report once closeouts of grants ending June 30<sup>th</sup> has been completed. We have expended 34.35% of our program funds on participant funds, and expended 74.29% of our total formula

program funds in total. We have met and exceeded the requirements for minimum participant cost rate (MPCR), Out-of-School Youth (OSY) expenditures, work experience expenditures, and obligation rates.

- Budget Update: Jennifer Bane reviewed the attached PY 2019 Budget Update and PY 20 Revised Budget. A large portion of our participant expenditures were shifted from formula funds to our statewide funds, increasing the amount of carrying over funds for the new program year. We ended the PY 19 under budget. The additional carryover funds increased our total budget for PY 20 by about \$136,000 giving us a total formula budget for the year of \$2.6 million. Our operations costs have been budgeted for roughly the same amount as last year leaving approximately \$788,00 to be utilized for participant costs. With additional rural funding, statewide funding, and the National Dislocated Worker Grant (DWG), our participant budget is about \$61,400 short of last year's budget. Our expenditures last year were about \$150,000 less than what was budgeted, so if expenditures stay about the same this year, we may not need any additional funding. Ted Piazza asked if we have received any guidance with respect to budget cuts or shortfall. Jennifer said the state has some reserves to help for participants, but not so much for staff and operations. We may see an impact from COVID-19 on next year's allocations, but this year's allocations have already been set. The DWG is a two-year grant and will also assist in offsetting budget shortfalls.

**Other:** Jennifer Bane presented the following:

- Youth Waivers: The attached youth waiver stating that 35-50% of PY 20 youth funding be spent on in-school youth (ISY) was reviewed. This will be a huge increase from the roughly 6% we currently spend on ISY, which will be really tough with the restrictive eligibility criteria and COVID-19 restrictions. Hopefully there will be no sanctions this year if the target is not met.
- Support Services Policy Changes: The proposed changes to the policy, as outlined in red in the attached document, will allow for additional assistance for secondary school students.
  - **MOTION: Jimmy Williamson moved to approve the Support Services Policy Changes as presented and Chris Young seconded the motion. All were in favor and the motion carried.**
- Targets for Key Performance Indicators (KPIs): The attached report details the results for the first and second quarter. We were pretty much down across the board this quarter, thanks mostly to COVID. This quarter's results are our numbers, but we have not seen the state's results yet. Our numbers were not the same as theirs last time. Our numbers included incumbent workers that we enroll as adults and statewide adults, but they were not included in the state's report. April-June is not usually a large enrollment period anyway. We are still struggling with youth enrollments, and we have started to try to post specific jobs instead of trying to simply recruit for a program. We are working on getting closer to a 50% co-enrollment of TAA participants. A lot of the current TAA participants are making too much to be co-enrolled. We did not have a RAMP class starting for this quarter. COVID delayed the Gibson and Obion County classes that we anticipated beginning this quarter. Mobile AJC and Adult Education re-entry participants served are also not included in the numbers, which will make it difficult for us to reach our re-entry goal. The only enrollments we had here were from the RAMP and two from WP. We are also still waiting on Jackson State's numbers for Adult Education.
- AJC Services Update: We are trying to follow some new guidelines that Connie Stewart shared from TBR and only close due to a positive test, or a probable positive due to a person exhibiting symptoms and having been exposed. This should help staff stay safe, but not require closing the AJCs as often.

**Future Meeting Dates & Upcoming Events:** The following upcoming meetings were reviewed by Jennifer Bane:

- Next Board Meeting: August 25th at 11:30 am by Zoom.
- State Board Meeting: August 28th on YouTube. Local and Regional Plan presentations will be recorded ahead of time and posted online. Areas will respond to any questions during the meeting.
- Regional Planning Council Meeting: September 22nd, 10:00 am by webinar.
- Remaining 2020 Executive Committee Meeting Date: October 28th, 10:00 am

Respectfully submitted,

Lana Burchfiel, Public Information Specialist

Northwest TN Workforce Board MONITORING STATUS REPORT

| Subcontractor  | Purpose of Subcontract                        | Scheduled  | Date of Review (s)                       | Corrective Action Needed | Letter Mailed: |
|--|---|------------|--|--------------------------|----------------|
| 2007-2107-OJT-61-1350626<br>Amteck, LLC 1106<br>East Court Street Dyersburg,<br>TN 38024 Stephanie<br>Ballard, Administrative Assistant<br>(731) 286-2772<br>sba;;ard@amteck.com             | On-the-Job Training: 07-<br>27-20 to 07-02-21 | Scheduled: | Phone Interview: 09-<br>10-20<br>Fiscal: | Programmatic:            | Letter Mailed: |
| 2008-2107-OJT-45-5067121 Twin<br>Oaks Technology, LLC 1046<br>Broadway Street Martin, TN<br>38237 Nicole Kincaid, COO<br>(731) 281-1212<br>nicole.kincade@twinoakstech.com                   | On-the-Job Training: 08-<br>19-20 to 07-01-21 | Scheduled: | Phone Interview: 09-<br>10-20<br>Fiscal: | Programmatic:            | Letter Mailed: |
| 2008-2101-OJT-62-1727136<br>CableSouth Media III dba Swyft Connect,<br>LLC 1056 Jones Blvd.<br>P.O. Box 620<br>Milan, TN 38358<br>Brian Forrest<br>bforrest@cablesouth.com (731)<br>693-8593 | On-the-Job Training:<br>08-31-20 to 01-01-21  | Scheduled: | Phone Interview:<br>09-28-20<br>Fiscal:  | Programmatic:            | Letter Mailed: |
| 2007-2105-OJT-85-0837531 Allied<br>Memory Foad, LLC dba HLJ Foam Product,<br>LLC 3014 Kefauver Drive<br>Milan, TN 38358<br>(731) 686-0821<br>hchicas@memoryfoam.com<br>Hector Chicas         | On-the-Job Training: 07-<br>17-20 to 05-12-21 | Scheduled: | Phone Interview: 08-<br>20-20<br>Fiscal: | Programmatic:            | Letter Mailed: |
| 2006-2106-OJT-82-5179383 West<br>TN Healthcare Dyersburg Beverly<br>Ray, Manager HR 400 East Tickle<br>Street Dyersburg, TN 38024<br>(731) 288-3608<br>beverly.ray@wth.org                   | On-the-Job Training: 06-<br>26-20 to 06-26-21 | Scheduled: | Phone Interview: 09-<br>09-20 Fiscal:    | Programmatic:            | Letter Mailed: |

|  |   |                                 |  |  |                           |
|--|---|---------------------------------|--|--|---------------------------|
| 2005-2008-OJT-47-3701669<br>Austin Mealer's Restaurant Equipment<br>Services P.O.<br>Box 872 Dyersburg, TN<br>38024 Attn: Jessica Sanders,<br>Director of Operations<br>(731) 445-4380<br>jessica@austonmealer.com | On-the-Job Training: 05-<br>29-20 to 08-30-20           | Scheduled: 07-14-2020           | Phone Interview:<br>07-14-2020<br>Fiscal: 09-11-2020 | Programmatic:                                      | Letter Mailed: 09-14-2020 |
| 2003-2103-OJT-62-1140109<br>Maverick, Inc. Cassie<br>Davis 623 Perkins<br>Street Union City, TN<br>38261 (731) 885-6444<br>Cassie.davis@coxoil.com   | On-the-Job Training: 03-<br>16-20 to 03-01-21           | Scheduled: 05-11-20             | Phone Interview:<br>05-11-20<br>Fiscal: 08-19-2020   | Programmatic:                                      | Letter Mailed: 08-20-2020 |
| 2003-2101-OJT-84-4597398<br>Alliance Staffing Group, LLC 107 S.<br>Courthouse Square Suite 209 Trenton, TN<br>38382 Mr. David Webb or<br>Lisa Patterson (731) 316-9284<br>l.patterson@alliancestaffing.com         | On-the-Job Training: 03-<br>12-20 to 02-24-21           | Scheduled:                      | Phone Interview: 09-<br>15-20<br>Fiscal:             | Programmatic:                                      | Letter Mailed:            |
| <b>RFP CONTRACTS THROUGH</b>   |   |                                 |  |  |                           |
| 1909-2009-OSO-62-0923487-SHARE Mid-<br>Cumberland Human Resource Agency<br>1101 Kermit Drive,<br>Suite 300 Nashville, TN 37217<br>jhamrick@mchra.com<br>(615) 850-3907   | One-Stop Operator<br>Services: 09-16-19 to 09-<br>30-20 | Expires: 09-30-2020             | Fiscal:  | Invoices Checked Monthly<br>per Executive Director | Letter Mailed:            |
| 1910-2009-CSP-62-0800930-MULTI<br>Dyersburg State Community College<br>1510 Lake Road Dyersburg, TN<br>38024 Dr. Karen Bowyer,<br>President  | Career and Business<br>Services                         | Dates: 10-01-19 to 06-<br>30-20 | Fiscal:  | Invoices Checked Monthly<br>per Executive Director | Letter Mailed:            |
| <b>INCUMBENT WORKER TRAINING THROUGH JUNE 30, 2020</b>   |   |                                 |  |  |                           |

|   |                  |  |                    |             |                           |
|---|------------------|--|--------------------|-------------|---------------------------|
| 2002-2005-IWT-82-16679-CB Granges<br>America, Inc 400 Bills Brook<br>Drive Huntingdon, TN<br>38344 731) 986-2746<br>jennifer.starks@granges.com   | Incumbent Worker | Expires: 06-30-2020  | Fiscal: 07-27-2020 | \$5,180.00  | Letter Mailed: 07-28-2020 |
| 2002-2005-IWT-25-1515179-CB<br>AADG Inc. dba CeCo Doors Ian<br>Cochran, HRIS manager 9159<br>Telecom Drive Milan, TN<br>38358 (731) 686-8345<br>ian.cochran@assaabloy.com                 | Incumbent Worker | Expires: 06-30-2020<br>Reduce Budget: \$9,080<br>Reduce # Trained: 2 | Fiscal: 07-06-2020 | \$9,080.00  | Letter Mailed: 07-07-2020 |
| 2002-2005-IWT-45-5356855-CB<br>Southern Chiropractic and Acupuncture 159<br>Court Square huntingdon,<br>TN 38344 (731) 535-3205<br>dr.kristamcgrady@gmail.com                             | Incumbent Worker | Expires: 06-30-2020<br>Modification                                  | Fiscal: 06-29-2020 | \$12,569.45 | Letter Mailed: 07-01-2020 |
| 2002-2005-IWT-62-1727136-CB<br>CableSouth Construction, LLC Cristy<br>Workman 1056 Jones<br>Blvd. Milan, TN 38358<br>(731) 612-9171<br>cworkman@mymedia3.com                              | Incumbent Worker | Expires: 06-30-2020<br>Modification                                  | Fiscal: 06-29-2020 | \$13,650.00 | Letter Mailed: 07-01-2020 |
| 2002-2005-IWT-26--1531586-CB Dana<br>Sealing Products, LLC 100<br>Plumley Drive Paris, TN<br>38242 Andrea Gooch,<br>HR Manager (731) 231-1540<br>andrea.gooch@dana.com                    | Incumbent Worker | Expires: 06-30-2020  | Fiscal: 07-23-2020 | \$23,611.61 | Letter Mailed: 07-24-2020 |
| 2002-2005-IWT-54-1138147-CB<br>American Woodmark Corporation Attn:<br>Eddie Rogers, NREMT 1 American<br>Woodmark Corporation Humboldt, TN<br>38343 (731) 824-5540<br>erogers@woodmark.com | Incumbent Worker | Expires: 05-31-2020  | Fiscal:            | \$0.00      | Cancelled Training        |



|   |                  |  |                    |             |                           |
|---|------------------|--|--------------------|-------------|---------------------------|
| 2002-2005-IWT-62-0123520-CB<br>Carroll Bank and Trust Attn:<br>Bonnie Autry, Human Resource 19510<br>Main Street Huntingdon, TN<br>38344 (731) 986-4401<br>bautry@carrollbank.com                                     | Incumbent Worker | Expires: 06-30-2020<br><b>Workers Comp: 05-05-2021</b> | Fiscal: 06-30-2020 | \$4,718.50  | Letter Mailed: 07-01-2020 |
| 2002-2005-IWT-62-0537961-CB Ford<br>Construction, Inc. Lisa<br>Keeling, HR Manager 1311<br>East Court Street Dyersburg, TN<br>38024 (731)285-5185<br>lisa.keeling@fordcc.com  | Incumbent Worker | Expires: 06-30-2020                                    | Fiscal: 08-12-2020 | \$4,575.00  | Letter Mailed: 08-17-2020 |
| 2002-2005-IWT-64-035780-CB<br>Choctaw Transportation Company Amy M.<br>Cresswell, Risk Manager P.O. Box 585<br>Dyersburg, TN 38024<br>amy.cresswell@fordcc.com<br>(731) 286-1528                                      | Incumbent Worker | Expires: 06-30-2020                                    | Fiscal:            | \$0.00      | Cancelled Training        |
| 2003-2005-IWT-46-4657373-CB<br>Eurotranciatura USA, LLC 2700<br>West Wood Street Paris, TN<br>38242 Attn: Kay Wood<br>HR Manager<br>kay.wood@us.eurogroup.it<br>(731) 644--8113                                       | Incumbent Worker | <b>Expires: 06-30-2020</b>                             | Fiscal: 07-24-2020 | \$12,525.00 | Letter Mailed: 07-27-2020 |
| 2003-2005-IWT-47-3701669-CB Austin<br>Mealer's Restaurant Equipment Services<br>P.O. Box 872<br>Dyersburg, TN 38024<br>Attn: Jessica Sanders, Director of<br>Operations (731)<br>445-4380<br>jessica@austonmealer.com | Incumbent Worker | Expires: 06-30-2020                                    | Fiscal:            | \$0.00      | Cancelled Training        |
| 2003-2005-IWT-39-0402810-CB<br>Kohler Company<br>Jeff Bennett<br>2000 North<br>5th Street Union<br>City, TN 38261 (731) 885-<br>1200<br>jeff.bennett@kohler.com   | Incumbent Worker | Expires: 06-30-2020                                    | Fiscal: 07-23-2020 | \$14,750.00 | Letter Mailed: 07-24-2020 |

|   |                  |                     |                    |             |                           |
|---|------------------|---------------------|--------------------|-------------|---------------------------|
| 2003-2005-IWT-62-1696855-CB Brad<br>Rusom Motor Company dba Carstar<br>Russum's Collision LaDona<br>Russum 2340 Upper<br>Finley Road Dyersburg, TN<br>38024 (731) 882-1971<br>russomsdyersburg@carstarusa.com | Incumbent Worker | Expires: 06-30-2020 | Fiscal: 07-27-2020 | \$2,981.00  | Letter Mailed: 08-17-2020 |
| 2003-2005-IWT-62-1814311-CB Colonial<br>Diversified Polymer Products 2055 Forrest<br>Street Dyersburg, TN 38024<br>(731) 287-3636<br>LaDon Byars, President, CEO  | Incumbent Worker | Expires: 05-31-2020 | Fiscal: 07-27-2020 | \$18,500.00 | Letter Mailed: 08-06-2020 |
| 2003-2005-IWT-62-0819507-CB Cox<br>Oil Co., Inc.<br>623 Perkins Street<br>Union City, TN 38261<br>731.885.6444<br>Cassie Hickey<br>cassie.hickey@coxoil.com   | Incumbent Worker | Expires: 06-30-2020 | Fiscal: 07-06-2020 | \$2,140.09  | Letter Mailed: 07-07-2020 |
| 2003-2005-IWT-62-11401109-CB<br>Maverick, Inc.<br>623 Perkins Street<br>Union City, TN 38261<br>731.885.6444<br>Cassie Hickey<br>cassie.hickey@coxoil.com   | Incumbent Worker | Expires: 06-30-2020 | Fiscal:            | \$590.00    | Letter Mailed: 07-07-2020 |
| 2003-2005-IWT-88-0335067-CB<br>Firestone Industrial Products Attn:<br>Angela Smith, HR Manager 1901 Sylvan<br>Road Dyersburg, TN<br>38024 (731) 882-3521<br>arsmith@fsip.com                                  | Incumbent Worker | Expires: 06-30-2020 | Fiscal: 07-16-2020 | \$8,010.87  | Letter Mailed: 07-24-2020 |
| 2003-2005-IWT-56-0754148-CB Tyson<br>Joe Taylor,<br>Continuous Improvement Manager<br>2000 Biffle Road<br>Newbern, TN 38059<br>(731) 627-4000<br>Joe.taylor@tyson.com   | Incumbent Worker | Expires: 06-30-2020 | Fiscal: 08-06-2020 | \$20,812.85 | Letter Mailed: 08-11-2020 |

|   |                  |                     |                    |             |                           |
|---|------------------|---------------------|--------------------|-------------|---------------------------|
| 2005-2006-IWT-62-1528894-CB<br>Advantage Manufacturing Corp. Attn:<br>David Hardin 9204<br>Highway 412 P.O. Box<br>128 Friendship, TN<br>38034 dhardin@crockett.net<br>(731) 414-3738     | Incumbent Worker | Expires: 06-30-2020 | Fiscal: 06-29-2020 | \$15,242.00 | Letter Mailed: 07-08-2020 |
| 2006-2006-IWT-62-020110-CB First<br>Citizens National Bank One First<br>Citizen Place 200 West Court<br>Street Dyersburg, TN<br>38024 (731) 287-4354<br>jhanlon@firstcnb.com              | Incumbent Worker | Expires: 06-30-2020 | Fiscal: 07-23-2020 | \$25,000.00 | Letter Mailed: 07-24-2020 |
| 2006-2006-IWT-67-1749417-CB<br>Tennessee Tractor, LLC 16<br>South Bell Street Alamo, TN<br>38001<br>Jsteele@tennesseetractor.com (731)<br>696-5598  | Incumbent Worker | Expires: 06-30-2020 | Fiscal:            | \$0.00      | Cancelled Training        |
| 2006-2006-IWT-22-1626865-CB<br>Frazier Industrial Company Attn:<br>Renee Murray 3000 Burks<br>Place Dyersburg, TN<br>38024 RMurray@frazier.com<br>(731) 389-9318                          | Incumbent Worker | Expires: 06-30-2020 | Fiscal: 07-28-2020 | \$6,425.00  | Letter Mailed: 08-17-2020 |
| 2006-2006-IWT-27-3780139-CB<br>Cavalier Pharmacy, LLC. Attn:<br>Derek Holyfield 8 North<br>Cavalier Drive Suite A Alamo, TN<br>38001 (731) 696-4000<br>tdholified@yahoo.com               | Incumbent Worker | Expires: 06-30-2020 | Fiscal: 07-29-2020 | \$12,100.00 | Letter Mailed: 08-17-2020 |
| 2006-2006-IWT-77-0650040-CB Dyer<br>Station Pharmacy, LLC. 137 South<br>Main Street Dyer, TN 38330<br>Attn: Derek Holyfield, Managing<br>Member<br>tdholified@yahoo.com<br>(731) 692-3578 | Incumbent Worker | Expires: 06-30-2020 | Fiscal: 07-28-2020 | \$14,000.00 | Letter Mailed: 08-07-2020 |

|   |                  |                     |                    |             |                           |
|---|------------------|---------------------|--------------------|-------------|---------------------------|
| 2006-2006-IWT-47-4589822-CB<br>Develey Mustard and Condiment<br>Attn: Lana Hammons                      1845<br>Mustard Lane                      Dyersburg,<br>TN 38024  | Incumbent Worker | Expires: 06-30-2020 | Fiscal: 07-27-2020 | \$5,430.00  | Letter Mailed: 08-17-2020 |
| 206-2006-IWT-62-0851889-CB      Carey<br>Counseling Center, Inc.      Attn: Michelle<br>Eaton, Business Mgr      408 Virginia Street<br>Paris, TN 38242<br>(731) 642-1010 | Incumbent Worker | Expires: 06-30-2020 | Fiscal: 07-10-2020 | \$10,050.00 | Letter Mailed: 07-13-2020 |



October 20, 2020

Ms. Jane Hamrick, Executive Director  
Mid-Cumberland Human Resource Agency  
1101 Kermit Drive, Suite 300  
Nashville, TN 37217

Dear Ms. Hamrick:

The Northwest Tennessee Workforce Board completed a six-month monitoring review of contract number 1909-2009-OSO-62-09-0923487-SHARE. The purpose of the review was to verify the following:

- Compliance with the Roles of the One-Stop Operator
- Timeliness of invoices submission
- Adequacy of documentation
- Proper completion of invoices
- Compliance within budget limits
- Performance Goals

We are pleased to report all areas of review were in accordance with the contract with the exception of the following items needing improvement in order to meet the Performance Goals:

1. Promoting the AJCs and maintaining a log of outreach activities conducted. Key Performance Indicator and Title I Youth enrollments goals are not being met, indicating a need for additional outreach.
2. Coordinating referrals and co-enrollments between partner programs to include a minimum of 10% of RESEA participants referred to the Title I program. At this time, 7% have been referred.
3. Coordinating referrals and co-enrollments to ensure Title I enrollment goals are met. Youth enrollment goals were not met.
4. Ensuring Data Validation requirements are met. As of the January 2020 Data Validation review: 6.5% of elements failed for Adults, 7.5% for Dislocated Workers, and 1.6% for Youth.

Additionally, average monthly traffic count goals are not being met. However, the Northwest Tennessee Workforce Board recognizes this has been negatively impacted by COVID-19 and that virtual rather than in-person services have been prioritized. Northwest Tennessee Workforce Board staff will review current goals and determine if adjustments are needed.

We look forward to continue our relationship during this contract. If you have, any questions please feel free to contact me.

Sincerely

Laura Speer  
Director of Performance & Compliance

Cc: Jennifer Bane, Derrick Quinn, Erica Nance, Jennifer Eppley

Documents attached: Fiscal Requests and Corrections, Performance Evaluation

**One-Stop Operator (OSO) Performance Evaluation**

**April - September 2020**

The following performance goals, as listed in the OSO contract, are utilized to evaluate performance of the OSO provider.

**(1) Compliance with the Scope of Work and Roles of the One-Stop Operator Provider**

| <b>Component/Benchmark</b>   | <b>Pass / Fail / Needs Improvement</b> | <b>Improvements Needed</b>  |
|--|--|---|
| Maintain a presence in the Comprehensive Centers two days per week each and rotating visits to the Affiliate / Specialized Centers one day per week.   | Pass                                   |   |
| Compile and submit monthly reports to the NWTNWB in regards to progress towards identified objectives such as partner coordination, traffic counts, referrals, co-enrollments, jobseekers and employers served, customer satisfaction results, and results of quality reviews conducted. | Pass                                   |   |
| Gather and submit various VOS reports monthly as requested such as Traffic Counts, Visit Reasons, Registrations, Enrollments, Co-Enrollments, Referrals, Job Orders, Placements, etc.  | Pass                                   |   |
| Gather partner reports and data, including success stories, at minimum of quarterly, for development of a Quarterly Dashboard and Annual Report.   | Pass                                   |   |
| Promote the AJCs and maintain a log of outreach activities conducted.  | Needs Improvement                      | Key Performance Indicator and Title I Youth enrollments goals are not being met, indicating a need for additional outreach. |
| Maintain complaint logs for each AJC, reporting complaints immediately and submitting logs quarterly to the NWTNWB in accordance with state guidelines.  | Pass                                   |   |
| Maintain professional office atmosphere, professional staff appearance, conduct and service to customers, and customer flow/meaningful access across all AJCs.   | Pass                                   |   |
| Maintain building maintenance logs, report issues to the appropriate landlord and / or Director of Facilities & Computer Services as needed, and submit logs monthly to track any facilities issues.   | Pass                                   |   |

|   |      |  |
|---|------|--|
| Maintain understanding of the Memorandum of Understanding (MOU), including the Infrastructure Funding Agreement (IFA) and report staffing or office usages changes which affect the MOU/IFA to the NWTNWB upon notification of changes.   | Pass |  |
| Maintain current listing of partner programs, staff, and contact information to ensure direct linkage and ease of referrals.  | Pass |  |
| Conduct monthly quality reviews of partner programs with a minimum sample size of 10 customers (e.g. selecting a sample of Evaluation of Service Need Forms to follow the customer through the AJC system and ensure appropriate referrals and / or services were provided, selecting a sample of enrolled participants in various programs to ensure participant needs are being met, tracking referrals to identify if co-enrollment resulted, etc.). | Pass |  |
| Verify VOS Vouchers are attributed to the appropriate grant through the monthly reconciliation process.   | Pass |  |
| Arrange and / or conduct trainings quarterly, at a minimum, and other periodic meetings for all AJC staff to ensure continuous improvement.   | Pass |  |
| Request access to VOS for new staff, including partner staff, from the Director of Facilities & Computer Services and submit immediate notification to the NWTNWB of staffing changes resulting in the need for access to be terminated.  | Pass |  |

**(2) Compliance with all Federal, State, and Local legislation, policies, and regulations in regards to the role of the One-Stop Operator and One-Stop Delivery and Design**

| <b>Component/Benchmark</b>  | <b>Pass / Fail / Needs Improvement</b> | <b>Improvements Needed</b>  |
|---|--|---|
| Workforce Innovation and Opportunity Act and related Federal Regulations and Guidance | Pass                                   |   |
| Data Validation requirements  | Needs improvement                      | Adults – 6.5% of elements failed<br>Dislocated Workers – 7.5% of elements failed<br>Youth – 1.6% of elements failed |
| Performance Accountability Review   | Pass                                   |   |

|   |      |  |
|---|------|--|
| requirements  |      |  |
| Tennessee Department of Labor and Workforce Development Policies and Guidance | Pass |  |
| Northwest Tennessee Workforce Board Policies and Guidance                     | Pass |  |

### (3) American Job Center Customer Visits

| Component/Benchmark   | Pass / Fail / Needs Improvement | Improvements Needed                       |
|---|---------------------------------|---|
| The contractor is responsible for maintaining average traffic flow as shown below. Targets were adjusted due to COVID-19 and re-designation of several AJCs to part-time centers. | Fail                            | Individual visit goals are not being met. |

#### Individual Visit Monthly Average Goal

| 2020-2021         | Camden | Alamo | Humboldt | Paris | Tiptonville | Union City | Dresden | Affiliate Subtotal | Dyersburg | Huntingdon | Comprehensive Subtotal | Total AJC |
|-------------------|--------|-------|----------|-------|-------------|------------|---------|--------------------|-----------|------------|------------------------|-----------|
| Sept. 2020 Actual | 17     | 3     | 60       | 67    | 4           | 30         | 35      | 72                 | 37        | 9          | 15                     | 87        |
| Revised Goal      | 72     | 46    | 282      | 255   | 22          | 251        | 211     | 1,139              | 561       | 386        | 947                    | 2,086     |
| Difference        | -88    | -57   | -94      | -170  | -38         | -84        | -142    | -673               | -188      | -129       | -317                   | -990      |
| % of Goal Met     | 23%    | 7%    | 21%      | 26%   | 18%         | 12%        | 17%     | 6%                 | 7%        | 2%         | 2%                     | 4%        |

Due to COVID-19, Northwest Tennessee Workforce Board staff will review current goals and determine if adjustments are needed.

### (4) Local Performance Measures

| Component/Benchmark  | Pass / Fail / Needs Improvement | Improvements Needed  |
|--|---------------------------------|--|
| The contractor is responsible for partner coordination to meet the local performance measures as outline below.                          | Needs Improvement               | Overall Title I enrollment goals were met, but the Youth enrollment goal was not met as shown below.   |
| Referrals and Co-Enrollments between partner programs to include a minimum of 10% of RESEA participants referred to the Title I program. | Fail                            | Of the 218 individuals completing a first scheduled RESEA appointment as of March 2020 (prior to the suspension of RESEA due to COVID-19), only 16, or 7%, were referred to Title I. |

| Enrollments in Training<br>(Classroom, OJT and Work Experience)<br>October 2019 – September 2020 | Projected Enrollments for Funding (Oct. 19 – Sept. 20) | Enrolled (Oct. 19 – Sept. 20) | Percentage of Contract Goal |
|--|--|-------------------------------|-----------------------------|
| Adult  | 280  | 361                           | 129%                        |
| Dislocated   | 39   | 43                            | 110%                        |
| Youth  | 92   | 66                            | 72%                         |
| Total  | 411  | 470                           | 114%                        |



## (5) Federal Performance Measures

| Component/Benchmark   | Pass / Fail / Needs Improvement | Improvements Needed |
|---|---------------------------------|---------------------|
| The contractor is responsible for partner coordination to meet the local performance measures as outline below. | Pass                            |                     |

### Adult Measures

|  | Goals   | Results |
|--|---------|---------|
| Employment Rate 2 <sup>nd</sup> Quarter After Exit | 86%     | 87.2%   |
| Employment Rate 4 <sup>th</sup> Quarter After Exit | 85%     | 85.3%   |
| Median Earnings 2 <sup>nd</sup> Quarter After Exit | \$6,500 | \$6,759 |
| Credential Attainment Within 4 Quarters After Exit | 59%     | 89.7%   |

### Dislocated Worker Measures:

|  |         |         |
|--|---------|---------|
| Employment Rate 2 <sup>nd</sup> Quarter After Exit | 84%     | 86.4%   |
| Employment Rate 4 <sup>th</sup> Quarter After Exit | 84%     | 85.1%   |
| Median Earnings 2 <sup>nd</sup> Quarter After Exit | \$6,842 | \$7,450 |
| Credential Attainment Within 4 Quarters After Exit | 69%     | 93.0%   |

### Youth Measures:

|  |                            |       |
|--|----------------------------|-------|
| Employment Rate 2 <sup>nd</sup> Quarter After Exit | 79%                        | 84.4% |
| Employment Rate 4 <sup>th</sup> Quarter After Exit | 75%                        | 79.5% |
| Median Earnings 2 <sup>nd</sup> Quarter After Exit | TBD (waived first 2 years) | n/a   |
| Credential Attainment Within 4 Quarters After Exit | 70%                        | 88.9% |

*Note: Program Year (PY) 19 goals were met. Official performance results through September 2020 are still pending. Estimated results indicate all measures continue to be met.*

### Employer Measures:

Employer Penetration Rate (percentage of employers using services in the State): TBD

Repeat Business Customer Rate (percentage of employers who receive core services more than once in the last three recording periods): TBD

### Other State Required Measures:

Facilitate enrollments and services with the Title I Provider to meet the following:

75% expenditure rate on out-of-school youth: **82.93%**

20% expenditure rate on Youth Work Experience: **35.5%**

40% expenditure rate on direct participant cost (may be increased to 50% by the TN Dept. of Labor & Workforce Development): **35.61%**

- Note: The participant cost rate for PY 19 exceeded the goal at 44.28%. If the current balance as of 10/20/20 of \$81,308.57 in participant occupational skills training and supportive service vouchers for July to September 2020 had been paid prior to September fiscal reports, the participant cost rate would have been 50.96%.



October 20, 2020

Dyersburg State Community College  
Attn: Dr. Karen Bowyer  
1510 Lake Road  
Dyersburg, TN 38024 Dear Dr.

Bowyer:

The Northwest Tennessee Workforce Board has completed a Performance review for the Career Service Provider, contract number 1909-2009-CSP-62-0800930-MULTI.

The purpose of the performance review (fiscal and programmatic) was to verify the following:

- Compliance with the Roles of Title I Provider
- New Enrollments in accordance with the number submitted
- Exits meeting the performance measures
- Enrollment and expenditure levels

The purpose of the fiscal monitoring review was to verify the following:

- Timeliness of invoice submission
- Adequacy of documentation
- Proper completion of invoice
- Compliance with budget limits

The purpose of the programmatic monitoring was to review:

- Adequacy of documentation
- Proper completion of paperwork and entry into State System, VOS
- Compliance of state and local policies
- Goals

Please see the attached report for the performance review. Due to the process we have for the monitoring of fiscal and programmatic reviews there are no findings, observations or corrective actions at this time.

Thank you for your cooperation. We look forward to continuing to work with Dyersburg State Community College in the future.

Sincerely,

Laura Speer  
Director of Performance & Compliance

Cc: Jennifer Bane Derrick Quinn Connie Stewart

# Career Services Provider Performance October 2020

The purpose of the performance review (fiscal and programmatic) was to verify the following:

- Compliance with the Roles of Title I Provider
- New Enrollments in accordance with the number submitted
- Exits Meeting the performance measures
- Enrollment and Expenditure levels

## Compliance with the Roles of the Title I Provider

There were Monthly reports completed for the last 6 months. A 20% sample of participant (ITA & OJT) applications were reviewed after the 10<sup>th</sup> of the following month for eligibility/data validation/training documents. The OJT applications not included in the 20% sample were reviewed for eligibility/data validation only. All reports were shared with the CSP Quality Advisor and Executive Director of Workforce Services.

Due to the process we have for the monitoring of fiscal and programmatic reviews, any findings, observations or corrective actions have already been addressed. Please find below the results of the monthly monitoring review:

| Summary:   | April | May | June | July | August | September | Totals | %      |
|--|-------|-----|------|------|--------|-----------|--------|--------|
| Number of Participants Reviewed:                               | 6     | 6   | 15   | 22   | 28     | 24        | 101    |        |
| Number / Percentage of Participants with Findings:             | 1     | 3   | 4    | 9    | 12     | 5         | 34     | 33.66% |
| 1. Eligibility Findings:                                       | 1     | 7   | 0    | 2    | 10     | 6         | 26     | 22.77% |
| 2. Data Validation Findings:                                   | 0     | 0   | 2    | 4    | 0      | 2         | 8      | 6.93%  |
| 3. Data Entry Findings:  | 0     | 0   | 1    | 1    | 4      | 0         | 6      | 4.95%  |
| 4. Case Management Findings:                                   | 0     | 1   | 2    | 1    | 0      | 1         | 5      | 4.95%  |
| Number / Percentage of Participants with Observations:         | 6     | 6   | 10   | 14   | 3      | 17        | 56     | 42.57% |
| Number / Percentage of Participants with No Monitoring Issues: | 5     | 0   | 5    | 7    | 5      | 7         | 29     | 12.87% |

\*\* Of the 26 Eligibility Findings, there were 0 of these, which would cause money to have to be returned.

The low-to-moderate risk findings included:

- Incomplete and / or errors on paperwork
- Documents not uploaded to VOS
- Incomplete and / or errors on VOS keying
- Additional documentation needed

New Enrollments in accordance with the chart submitted in Attachment B of contract:

| Projected Enrollments             |                   |       |       |
|-----------------------------------|-------------------|-------|-------|
| Adult                             | Dislocated Worker | Youth | Total |
| 280                               | 39                | 92    | 411   |
| Enrolled 10/01/2019 to 09/30/2020 |                   |       |       |
| 361                               | 66                | 43    | 227   |
| % Complete of Contract            |                   |       |       |
| 129%                              | 110%              | 72%   | 114%  |

| Projected Enrollments             |                   |       |       |
|-----------------------------------|-------------------|-------|-------|
| Adult                             | Dislocated Worker | Youth | Total |
| 280                               | 39                | 92    | 411   |
| Enrolled 04/01/2020 to 09/30/2020 |                   |       |       |
| 161                               | 28                | 38    | 227   |
| % Complete of Contract            |                   |       |       |
| 58%                               | 72%               | 41%   | 55%   |

|   |
|---|
| TAA Co-Enrollment Goal = 50%                    |
| Actual amount = 23% (15 of 64 TAA participants) |
| As of 09/30/2020                                |

Exits to meet the performance measures as stated in Attachment B of contract:

Note: Official performance results through September 2020 are still pending. Estimated results indicate all measures continue to be met.

| PY19 Q4 WIOA Core Performance Measures    |            | 47145 Northwest Tennessee |           |
|---|------------|---------------------------|-----------|
| Adult Measures                            |            | Pass/Fail                 | PASS      |
|   | Negotiated | Actual                    | % of goal |
| Exiters                                   |            | 398                       |           |
| Participants Served                       |            | 596                       |           |
| EER 2nd Qtr. after Exit                   | 86.00%     | 87.20%                    | 101.40%   |
| EER 4th Qtr. after Exit                   | 85.00%     | 87.6%                     | 103.06%   |
| Median Earnings<br>2nd Quarter after exit | \$6,500.00 | \$ 6759                   | 103.98%   |
| Credential Attainment                     | 59.00%     | 89.70%                    | 152.03%   |
| Measurable Skills Gains                   | Baseline   | 73.10%                    |           |
| Dislocated Worker                         |            | Pass/Fail                 | PASS      |
|   | Negotiated | Actual                    | % of goal |
| Exiters                                   |            | 39                        |           |
| Participants Served                       |            | 74                        |           |
| EER 2nd Qtr. after Exit                   | 84.00%     | 86.40%                    | 102.86%   |
| EER 4th Qtr. after Exit                   | 84.00%     | 85.10%                    | 101.31%   |
| Median Earnings<br>2nd Quarter after exit | \$6,842.00 | \$7,450                   | 108.89%   |
| Credential Attainment                     | 69.00%     | 93.00%                    | 134.78%   |
| Measurable Skills Gains                   | Baseline   | 70.00%                    |           |
| Youth                                     |            | Pass/Fail                 | PASS      |
|   | Negotiated | Actual                    | % of goal |
| Exiters                                   |            | 109                       |           |
| Participants Served                       |            | 122                       |           |
| EER 2nd Qtr. after Exit                   | 79.00%     | 84.40%                    | 103.65%   |
| EER 4th Qtr. after Exit                   | 75.00%     | 79.50%                    | 104.61%   |
| Credential Attainment                     | 70.00%     | 88.90%                    | 123.47%   |
| Measurable Skills Gains                   | Baseline   | 68.40%                    |           |

**Enrollment and expenditure level to meet State required fiscal measures:**

- 75% expenditure rate on out-of-school youth: 82.93%
- 20% expenditure rate on Youth Work Experience: 35.5%
- 40% expenditure rate on direct participant cost (may be increased to 50% by the TN Dept. of Labor & Workforce Development): 35.61%
  - Note: The participant cost rate for PY19 exceed the goal of 44.28%. If the current balance as of 10/20/2020 of \$ 81,308.57 in participant occupational skills training and supportive service vouchers for July to September 2020 has been paid prior to September fiscal reports, the participant cost rate would have been 50.96%.

**Comments:**

Overall, the CSP is within the contract agreement, except Youth enrollment goals were not met. Total enrollments exceeded the contracted amount (114%), but Youth enrollments were only 72% of the contracted goals (66 enrolled toward goal of 92). Restrictive Youth eligibility criteria unfortunately result in many youth-aged individuals being enrolled in the Adult program rather than the Youth program. Furthermore, while the Youth Work Experience program typically sees a large number of enrollments in the summer months, the COVID-19 pandemic has had a negative impact on the number of Work Experience participants enrolled. Despite this, Youth enrollments for the second half of the contract year (38) exceeded those for the first half of the year (28). Northwest Tennessee Workforce Board staff will continue to work with the contractor to increase enrollments, particularly of In-School Youth, and will seek guidance from the Tennessee Department of Labor and Workforce Development regarding adjustments to future Key Performance Indicator Enrollment Goals.

PY20 Q1 WIOA Core Performance Measures  
4 Rolling quarters

47145 Northwest Tennessee

| Adult Measures         | Pass/Fail   |             | Pass      |
|------------------------|-------------|-------------|-----------|
|                        | Negotiated  | Actual      | % of Goal |
| Exiters                | 0           | 398         |           |
| Participants Served    | 0           | 594         |           |
| EER 2nd Qtr after exit | 82%         | 87%         | 106.5%    |
| EER 4th Qtr after exit | 82%         | 88%         | 106.83%   |
| Med. Earnings          | \$ 6,650.00 | \$ 6,756.58 | 101.60%   |
| Cred. Attainment       | 63%         | 90%         | 142.38%   |
| MSG                    | 52%         | 73%         | 140.38%   |
| Dislocated Worker      | Pass/Fail   |             | Pass      |
|                        | Negotiated  | Actual      | % of Goal |
| Exiters                | 0           | 39          |           |
| Participants Served    | 0           | 74          |           |
| EER 2nd Qtr after exit | 82%         | 86.40%      | 105.37%   |
| EER 4th Qtr after exit | 82%         | 85.10%      | 103.78%   |
| Med. Earnings          | \$ 7,600.00 | \$ 7,450.06 | 98.03%    |
| Cred. Attainment       | 66%         | 93%         | 140.91%   |
| MSG                    | 48%         | 70%         | 145.83%   |
| Youth                  | Pass/Fail   |             | Pass      |
|                        | Negotiated  | Actual      | % of Goal |
| Exiters                | 0           | 109         |           |
| Participants Served    | 0           | 122         |           |
| EER 2nd Qtr after exit | 76%         | 82.40%      | 108.42%   |
| EER 4th Qtr after exit | 75%         | 79.5%       | 106.00%   |
| Med. Earnings          | \$ 3,300.00 | \$ 3,563.18 | 107.98%   |
| Cred. Attainment       | 69%         | 88.9%       | 128.84%   |
| MSG                    | 45%         | 68.4%       | 152.00%   |
|                        |             |             |           |

PY20 Q1 WIOA Core Performance Measures

47145 Northwest Tennessee

| Adult Measures         | Pass/Fail   |             | Pass      |
|------------------------|-------------|-------------|-----------|
|                        | Negotiated  | Actual      | % of Goal |
| Exiters                | 0           | 44          |           |
| Participants Served    | 0           | 337         |           |
| EER 2nd Qtr after exit | 82%         | 81.6%       | 99.5%     |
| EER 4th Qtr after exit | 82%         | 89.8%       | 109.51%   |
| Med. Earnings          | \$ 6,650.00 | \$ 7,544.00 | 113.44%   |
| Cred. Attainment       | 63%         | 86.0%       | 136.51%   |
| MSG                    | 52%         | 46.4%       | 89.23%    |
| Dislocated Worker      | Pass/Fail   |             | Pass      |
|                        | Negotiated  | Actual      | % of Goal |
| Exiters                | 0           | 7           |           |
| Participants Served    | 0           | 48          |           |
| EER 2nd Qtr after exit | 82%         | 84.60%      | 103.17%   |
| EER 4th Qtr after exit | 82%         | 86.70%      | 105.73%   |
| Med. Earnings          | \$ 7,600.00 | \$ 6,232.90 | 82.01%    |
| Cred. Attainment       | 66%         | 87.5%       | 132.58%   |
| MSG                    | 48%         | 37.1%       | 77.29%    |
| Youth                  | Pass/Fail   |             | Pass      |
|                        | Negotiated  | Actual      | % of Goal |
| Exiters                | 0           | 11          |           |
| Participants Served    | 0           | 47          |           |
| EER 2nd Qtr after exit | 76%         | 76.50%      | 100.66%   |
| EER 4th Qtr after exit | 75%         | 82.8%       | 110.40%   |
| Med. Earnings          | \$ 3,300.00 | \$ 5,056.26 | 153.22%   |
| Cred. Attainment       | 69%         | 100%        | 144.93%   |
| MSG                    | 45%         | 24%         | 53.33%    |
|                        |             |             |           |



| FINANCIAL STATUS REPORT FOR MONTH ENDING 9/30/2020 |                                 |                              |                                     |                                |                          |                                       |                                   |                                     |
|--|---------------------------------|------------------------------|-------------------------------------|--------------------------------|--------------------------|---------------------------------------|-----------------------------------|-------------------------------------|
|  | CONTRACT<br>BUDGET<br>9/30/2020 | CUM.<br>EXPENSE<br>9/30/2020 | CURRENT MO<br>ACCRUALS<br>9/30/2020 | TOTAL<br>EXP/ACCR<br>9/30/2020 | OBLIGATIONS<br>9/30/2020 | TOTAL EXP<br>ACCR & OBLG<br>9/30/2020 | DEOBLIGATED<br>FUNDS<br>9/30/2020 | UNOBLIGATED<br>BALANCE<br>9/30/2020 |
| AS OF DATE   |                                 |                              |                                     |                                |                          |                                       |                                   |                                     |
| FORMULA PROGRAM FUNDS                              |                                 |                              |                                     | invoiced not pd                | July-Jan 18 not pd       |                                       |                                   |                                     |
| ADULT OPERATIONS                                   | \$ 458,831.72                   | \$ 474,430.23                | \$ 2,716.97                         | \$ 477,147.20                  | \$ 23,651.02             | \$ 500,798.22                         | \$ -                              | \$ (41,966.50)                      |
| ADULT PARTICIPANT                                  | \$ 305,887.82                   | \$ 131,409.78                | \$ 27,176.35                        | \$ 158,586.13                  | \$ 48,431.51             | \$ 207,017.64                         | \$ -                              | \$ 98,870.18                        |
| ADULT TOTAL  | \$ 764,719.54                   | \$ 605,840.01                | \$ 29,893.32                        | \$ 635,733.33                  | \$ 72,082.53             | \$ 707,815.86                         | \$ -                              | \$ 56,903.68                        |
| PERCENTAGE PARTICIPANT                             | 40.00%                          | 21.69%                       | 90.91%                              | 24.95%                         | 67.19%                   | 29.25%                                | #DIV/0!                           |                                     |
| PERCENTAGE EXP/OBLG                                |                                 |                              |                                     |                                |                          | 93%                                   |                                   |                                     |
| DSLWK OPERATIONS                                   | \$ 393,323.47                   | \$ 423,155.75                | \$ 51,424.08                        | \$ 474,579.83                  | \$ 62,141.18             | \$ 536,721.01                         | \$ -                              | \$ (143,397.54)                     |
| DLSWK PARTICIPANT                                  | \$ 262,215.64                   | \$ 22,201.21                 | \$ -                                | \$ 22,201.21                   | \$ 15,463.68             | \$ 37,664.89                          | \$ -                              | \$ 224,550.75                       |
| DSLWK TOTAL  | \$ 655,539.11                   | \$ 445,356.96                | \$ 51,424.08                        | \$ 496,781.04                  | \$ 77,604.86             | \$ 574,385.90                         | \$ -                              | \$ 81,153.21                        |
| PERCENTAGE PARTICIPANT                             | 40.00%                          | 4.99%                        | 0.00%                               | 4.47%                          | 19.93%                   | 6.56%                                 | #DIV/0!                           | 276.70%                             |
| PERCENTAGE EXP/OBLG                                |                                 |                              |                                     |                                |                          | 88%                                   |                                   |                                     |
| YOUTH OPERATIONS                                   | \$ 641,785.22                   | \$ 432,446.87                | \$ 19,613.68                        | \$ 452,060.55                  | \$ 31,202.17             | \$ 483,262.72                         | \$ -                              | \$ 158,522.50                       |
| YOUTH PARTICIPANT                                  | \$ 641,785.22                   | \$ 192,456.51                | \$ 30,150.27                        | \$ 222,606.78                  | \$ 62,227.61             | \$ 284,834.39                         | \$ -                              | \$ 356,950.83                       |
| YOUTH TOTAL  | \$ 1,283,570.44                 | \$ 624,903.38                | \$ 49,763.95                        | \$ 674,667.33                  | \$ 93,429.78             | \$ 768,097.11                         | \$ -                              | \$ 515,473.33                       |
| PERCENTAGE PARTICIPANT                             | 50.00%                          | 30.80%                       | 60.59%                              | 33.00%                         | 66.60%                   | 37.08%                                | #DIV/0!                           | 69.25%                              |
| PERCENTAGE EXP/OBLG                                |                                 |                              |                                     |                                |                          | 60%                                   |                                   |                                     |

#### FORMULA PERCENTAGES

|                            |                 |                 |               |                 |               |                 |         |                 |
|----------------------------|-----------------|-----------------|---------------|-----------------|---------------|-----------------|---------|-----------------|
|                            |                 |                 |               | \$ 1,966,221.80 |               |                 |         | \$ 724,342.30   |
|                            |                 |                 |               | \$ 159,040.10   |               |                 |         | \$ 70,812.08    |
| TOTAL FORMULA OPERATIONS   | \$ 1,493,940.41 | \$ 1,330,032.85 | \$ 73,754.73  | \$ 1,403,787.58 | \$ 116,994.37 | \$ 1,520,781.95 | \$ -    | \$ (26,841.54)  |
| TOTAL FORMULA PARTICIPANT  | \$ 1,209,888.68 | \$ 346,067.50   | \$ 57,326.62  | \$ 403,394.12   | \$ 126,122.80 | \$ 529,516.92   | \$ -    | \$ 680,371.76   |
| TOTAL ALL FORMULA          | \$ 2,703,829.09 | \$ 1,676,100.35 | \$ 131,081.35 | \$ 1,807,181.70 | \$ 243,117.17 | \$ 2,050,298.87 | \$ -    | \$ 653,530.22   |
| PERCENTAGE PARTICIPANT     | 44.75%          | 20.65%          | 43.73%        | 22.32%          | 51.88%        | 25.83%          | #DIV/0! | 104.11%         |
| PERCENTAGE EXPENDED /OBL   |                 |                 |               | 66.84%          |               | 75.83%          | 0.00%   |                 |
| YOUTH OUT OF SCHOOL        | \$ 1,215,103.75 | \$ 565,000.68   | \$ 41,199.96  | \$ 606,200.64   | \$ 67,243.65  | \$ 673,444.29   |         | \$ 541,659.46   |
| PERCENTAGE OUT SCHOOL      | 94.67%          | 90.41%          | 82.79%        | 89.85%          | 71.97%        | 87.68%          |         |                 |
| YOUTH WORK EXPERIENCE      | \$ 256,714.09   | \$ 247,642.04   | \$ 26,408.96  | \$ 274,051.00   | \$ 31,813.58  | \$ 305,864.58   |         | \$ (49,150.49)  |
| PERCENTAGE WORK EXP        | 20.00%          | 39.63%          | 53.07%        | 40.62%          | 34.05%        | 39.82%          |         |                 |
| OTHER FUNDS                |                 |                 |               |                 |               |                 |         |                 |
|                            |                 |                 |               | \$ -            |               | \$ -            | \$ -    | \$ -            |
| National DW Grant          | \$ 224,180.00   | \$ -            | \$ 9,062.00   | \$ 9,062.00     | \$ 116,008.38 | \$ 125,070.38   |         | \$ 99,109.62    |
| STATEWIDE / NATA           | \$ 893,952.36   | \$ 184,023.00   | \$ 4,387.60   | \$ 188,410.60   | \$ 147,701.52 | \$ 336,112.12   | \$ -    | \$ 557,840.24   |
| RESEA                      | \$ 232,165.00   | \$ 170,861.69   | \$ 6,907.32   | \$ 177,769.01   | \$ 61,304.11  | \$ 239,073.12   | \$ -    | \$ (6,908.12)   |
| TOTAL OTHER FUNDS          | \$ 1,573,572.36 | \$ 373,041.43   | \$ 60,967.62  | \$ 434,009.05   | \$ 444,713.97 | \$ 878,723.02   | \$ -    | \$ 694,849.34   |
| TOTAL PROG FORMULA/OTHER   | \$ 4,277,401.45 | \$ 2,049,141.78 | \$ 192,048.97 | \$ 2,241,190.75 | \$ 687,831.14 | \$ 2,929,021.89 | \$ -    | \$ 1,348,379.56 |
| ADMINISTRATION             | \$ 393,325.02   | \$ 200,842.88   | \$ 472.32     | \$ 201,315.20   | \$ 1,227.25   | \$ 202,542.45   | \$ -    | \$ 190,782.57   |
| TOTAL ALL FUNDS            | \$ 4,670,726.47 | \$ 2,249,984.66 | \$ 192,521.29 | \$ 2,442,505.95 | \$ 689,058.39 | \$ 3,131,564.34 | \$ -    | \$ 1,539,162.13 |
|                            | \$ -            | \$ -            | \$ -          | \$ -            | \$ -          | \$ -            | \$ -    | \$ -            |
| PARTICIPANT % ALL FUNDS    |                 |                 |               |                 |               |                 |         |                 |
| TOTAL FORMULA OPERATIONS   | \$ 1,493,940.41 | \$ 1,330,032.85 | \$ 73,754.73  | \$ 1,403,787.58 | \$ 116,994.37 | \$ 1,520,781.95 | \$ -    | \$ (26,841.54)  |
| TOTAL FORMULA PARTICIPANT  | \$ 1,209,888.68 | \$ 346,067.50   | \$ 57,326.62  | \$ 403,394.12   | \$ 126,122.80 | \$ 529,516.92   | \$ -    | \$ 680,371.76   |
| CONS. BUSINESS-IWT         | \$ 85,664.63    | \$ -            | \$ -          | \$ -            |               | \$ -            |         |                 |
| CONS. BUSINESS-OJT / RA    | \$ 73,177.93    | \$ -            | \$ 1,778.00   | \$ 1,778.00     | \$ 116,008.38 | \$ 117,786.38   | \$ -    | \$ 99,109.62    |
| STATEWIDE / NATA           | \$ 893,952.36   | \$ 184,023.00   | \$ 4,387.60   | \$ 188,410.60   | \$ 147,701.52 | \$ 336,112.12   | \$ -    | \$ 557,840.24   |
| TOTAL FORMULA-CB-RR-RAMP   | \$ 3,979,899.01 | \$ 1,878,280.09 | \$ 177,857.65 | \$ 2,056,137.74 | \$ 626,527.03 | \$ 2,682,664.77 | \$ -    | \$ 1,355,287.68 |
| TOTAL PARTICIPANT- CB - RR | \$ 2,400,293.97 | \$ 548,247.24   | \$ 104,102.92 | \$ 652,350.16   | \$ 509,532.66 | \$ 1,161,882.82 | \$ -    | \$ 1,382,129.22 |
| PERCENTAGE PARTICIPANT     | 60%             | 29%             | 59%           | 32%             | 81%           | 43%             | #DIV/0! | 102%            |

\*Prior Year Accruals Not Excluded

**Northwest PY 2020 Budget - Revised Oct. 2020**  
**vs. YTD Expenditures as of 9/30/20**

|   | Budget                 | July - Sept. 2020      | Percentage of Budget |
|---|------------------------|------------------------|----------------------|
| <b>Participant Budget (34% prg)*</b>      | <b>\$ 707,159.52</b>   | <b>\$ 100,609.21</b>   | <b>14%</b>           |
| <i>*Formula funds only</i>                |                        |                        |                      |
| <b>Operating Budget (66% prg)</b>         | <b>\$ 1,522,993.73</b> | <b>\$ 380,748.43</b>   | <b>25%</b>           |
| IFA Expenses (including OSO)              | \$ 164,244.14          | \$ 29,474.14           | 18%                  |
| Career Service Provider                   | \$ 806,282.00          | \$ 197,001.01          | 24%                  |
| Board / Fiscal Agent Expenses             | \$ 807,874.26          | \$ 114,491.39          | 14%                  |
| <b>Total Operating Expenses</b>           | <b>\$ 1,778,400.40</b> | <b>\$ 340,966.54</b>   | <b>19%</b>           |
| <i>Remaining Balance</i>                  | <i>\$ (255,406.67)</i> | <i>\$ 39,781.89</i>    | <i>6%</i>            |
| <b>RESEA Program Operating Budget</b>     | <b>\$ 83,555.96</b>    | <b>\$ 29,159.97</b>    | <b>35%</b>           |
| <i>(7/1/20 - 12/31/20)</i>                |                        |                        |                      |
| <b>Administrative Budget</b>              | <b>\$ 247,953.38</b>   | <b>\$ 60,928.40</b>    | <b>25%</b>           |
| <b>Adult &amp; DW Part. &amp; Program</b> | <b>\$ 1,460,653.26</b> | <b>\$ 282,585.14</b>   | <b>19%</b>           |
| <b>Youth Part. &amp; Program</b>          | <b>\$ 776,953.28</b>   | <b>\$ 158,990.61</b>   | <b>20%</b>           |
| <b>Total Part. &amp; Program</b>          | <b>\$ 2,237,606.54</b> | <b>\$ 441,575.75</b>   | <b>20%</b>           |
| <i>Remaining Balance</i>                  | <i>\$ -</i>            | <i>\$ 1,796,030.79</i> | <i>80%</i>           |
| <b>Adult &amp; DW Program Only</b>        | <b>\$ 1,104,360.33</b> | <b>\$ 232,135.60</b>   | <b>21%</b>           |
| <b>Youth Program Only</b>                 | <b>\$ 426,086.69</b>   | <b>\$ 108,830.94</b>   | <b>26%</b>           |
| <b>Total Program</b>                      | <b>\$ 1,530,447.02</b> | <b>\$ 340,966.54</b>   | <b>22%</b>           |
| <i>Remaining Balance</i>                  | <i>\$ -</i>            | <i>\$ 1,189,480.48</i> | <i>78%</i>           |

## **Workforce Services Policy – Monitoring**

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### **Executive Summary**

#### **1. What is the general purpose of this policy?**

To maintain a compliant and effective workforce system, continuous monitoring must be conducted. Federal regulations require each State to create a monitoring system that provides annual, on-site monitoring to determine the compliance of Local Workforce Development Boards (LWDBs)<sup>1</sup>. In addition to ensuring compliance of the workforce system, monitoring must work to determine the effectiveness of the system and develop ways to improve or share best practices. Monitoring conducted by the State Workforce Development Board (SWDB) and LWDBs will help meet federal requirements but will ultimately serve as continuous improvement for the workforce system.

#### **2. What are the notable guidelines conveyed within this policy?**

- Establishes the requirement for quarterly monitoring submissions by the LWDBs to include an update on regional and local plans.
- Details the use of quarterly monitoring submissions and monitoring efforts to include corrective action and technical assistance.
- Establishes annual program monitoring along with the already established annual financial monitoring.

#### **3. What must the Local Workforce Development Board do to meet the requirements of this policy?**

- Submit quarterly monitoring reports to Workforce Services
- Conduct Data Validation quarterly and annually
- Comply with annual monitoring efforts
- Correct findings found through monitoring
- Participate in technical assistance if monitoring reports any findings
- Create a local monitoring policy

#### **4. How does this policy affect the workforce system?**

This policy establishes the monitoring expectations and requirements that will be conducted by the Workforce Services Division and its subrecipients. This will allow for consistency, accountability and compliance with federal awards.

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<sup>1</sup> 20 CFR 683.410



STATE OF TENNESSEE  
**State Workforce Development Board**  
220 French Landing Drive, 4A  
Nashville, TN 37243-1002  
(615) 741-0409

**Workforce Services Policy- Monitoring**

**Effective Date:** November 13, 2020

**Duration:** September 30, 2022

**Purpose:**

To maintain a compliant and effective workforce system, continuous monitoring must be conducted. Federal regulations require each State to create a monitoring system that provides annual, on-site monitoring to determine the compliance of Local Workforce Development Boards (LWDBs)<sup>2</sup>. In addition to ensuring compliance of the workforce system, monitoring must work to determine the effectiveness of the system and develop ways to improve or share best practices. Monitoring conducted by the State Workforce Development Board (SWDB) and LWDBs will help meet federal requirements but will ultimately serve as continuous improvement for the workforce system.

**Scope:**

Office of the Governor, Tennessee Department of Labor and Workforce Development (TDLWD); Division of Workforce Services (WFS); Tennessee Department of Economic and Community Development (ECD); Tennessee Department of Education (TNED); Tennessee Department of Human Services (DHS); State Workforce Development Board (SWDB); Title I – Adult, Dislocated Worker, and Youth Programs, Title II – Adult Education and Family Literacy Act Program(AE); Title III – Wagner-Peyser Act Program (WP); Title IV – Vocational Rehabilitation Program (VR); Regional Planning Council (RPC); Local Workforce Development Boards (LWDB); Local Workforce Development Areas (LWDA); American Job Center (AJC); One-Stop Operator (OSO); Workforce System Sub-Recipients (Sub-Recipients); Workforce System Partners (Partners)

**I. Establishment of Monitoring:**

Every State is responsible for the monitoring and oversight of program performance and fiscal management<sup>3</sup>. In order to ensure this requirement is met, the State must develop a monitoring system. This system must:

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<sup>2</sup> 20 CFR 683.410

<sup>3</sup> 2 CFR Part 200

- Provide annual on-site monitoring of local area compliance with 2 *CFR Part 200*<sup>4</sup>
- Ensure established policies meet objectives of WIOA<sup>5</sup>
- Determine if sub-recipients demonstrate substantial compliance<sup>6</sup>
- Determine if a local plan is disapproved for failure to make progress in addressing deficiencies<sup>7</sup>
- Ensure compliance with *WIOA Sec. 188*<sup>8</sup>

The monitoring system established through this policy will involve the following:

- Title I- Adult, Dislocated Worker, and Youth
- Title III- Wagner-Peyser
- Trade Adjustment Assistance (TAA)
- Jobs for Veterans State Grants (JVSG)
- Senior Community Service Employment Program (SCSEP)
- Apprenticeship Program Grants
- National Dislocated Worker Grants (NDWG)
- H1-B Job Training Programs
- National Farmworker Jobs Program (NFJP)
- Reemployment Services and Eligibility Assessment (RESEA) Program
- Supplemental Nutrition Assistance Program- Employment & Training (SNAP E&T)
- Work Opportunity Tax Credit (WOTC)
- Eligible Training Provider List (ETPL)
- Business Services
- Fiscal Management
- Indian and Native American (INA) Program<sup>9</sup>
- Job Corps<sup>10</sup>
- Youthbuild<sup>11</sup>
- Reentry Employment Opportunities (REO)<sup>12</sup>

## II. Responsibilities for Monitoring

### a. Quarterly Monitoring

To maintain an effective and compliant workforce system, the Tennessee Department of Labor (TDLWD) Workforce Services (WFS) Division staff and subrecipients must conduct monitoring on a quarterly basis at a minimum. The frequency of quarterly monitoring will allow WFS and sub-recipients to identify potential compliance issues, track progress on initiatives, and alter strategies. The quarterly monitoring that must take place will include the following items:

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<sup>4</sup> 20 CFR 683.410 (b)(2)(i)

<sup>5</sup> 20 CFR 683.410 (b)(2)(ii)

<sup>6</sup> 20 CFR 683.410 (b)(2)(iii)

<sup>7</sup> 20 CFR 683.410 (b)(2)(iv)

<sup>8</sup> 20 CFR 683.410 (b)(2)(v)

<sup>9</sup> Not currently overseeing this program

<sup>10</sup> Not currently overseeing this program

<sup>11</sup> Not currently overseeing this program

<sup>12</sup> Not currently overseeing this program

i. **Data Validation**

Data validation will be conducted quarterly by both WFS program staff and LWDB staff. Specific instructions on the process and responsibilities is established in the *WFS Policy- Data Validation*.

ii. **Submission of Quarterly Monitoring Reports**

The LWDBs must conduct monitoring and submit a quarterly report that outlines the results of their monitoring. This report must be submitted by the 30<sup>th</sup> calendar day following the end of each quarter. The report must be submitted by email to [Workforce.Board@tn.gov](mailto:Workforce.Board@tn.gov). The report must be structured based on guidance provided by WFS. The elements included in the report are below:

1. LWDB Governance Requirements
2. Complaints regarding Equal Opportunity violations
3. Fiscal Analysis
4. Current Key Performance Indicator (KPI) Data
5. Business Engagement
6. Copies of New/Amended LWDB policies
7. Best Practices, New Initiatives, and Challenges
8. Update on Regional and Local Plan

iii. **Review of Quarterly Monitoring**

The first business day following the submission of quarterly monitoring reports will begin the quarterly monitoring review period. The submitted reports will be compiled and reviewed to ensure compliance, track progress, identify concerns and locate best practices. The review will be conducted by Program Integrity (PI) staff in consultation with WFS subject matter experts. A report for each LWDA and planning region will be compiled and submitted to the WFS Assistant Commissioner by the last business day of each quarter. The results of the quarterly reviews will be shared with the WFS subject matter experts and the Strategic Improvement (SI) unit to either address concerns or to establish the need for technical assistance.

b. **Annual Responsibilities**

The State must conduct fiscal<sup>13</sup> monitoring and data validation<sup>14</sup> on an annual basis. Along with the required monitoring that must take place, WFS will be conducting annual reviews for programs and the workforce system to ensure compliance and effectiveness. Below are the required monitoring efforts that will be conducted annually.

i. **Data Validation**

Data validation will be conducted annually by both WFS program staff and LWDB staff. Specific instructions on the process and responsibilities is established in the *WFS Policy- Data Validation*.

ii. **On-site Fiscal Reviews**

The requirement to conduct an annual review on fiscal management and reporting is carried out by the Program Accountability Review (PAR) unit. PAR will provide the on-site monitoring for fiscal management for each LWDB that is awarded federal

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<sup>13</sup> 2 CFR Part 200

<sup>14</sup> TEGL 23-19

funding for WIOA Title I funding. Along with monitoring the LWDBs, PAR will monitor other sub-recipients based on the established contracts by WFS. These reviews of other sub-recipients will be conducted once every three years unless otherwise stated by the specific grant. The total number of grants for review, the specific instructions on what to review, along with a tentative schedule will be provided to PAR on October 1<sup>st</sup> each year.

**iii. Program and System Reviews**

Outside of case file reviews and fiscal monitoring, the WFS staff will conduct annual monitoring for each LWDB and sub-recipient on the programmatic requirement and system effectiveness. This monitoring will be conducted by utilizing the established WFS Monitoring tool along with applicable program guidance or tools. The timeline for conducting this monitoring will be established by October 1<sup>st</sup> each year. The following process will be observed to conduct this monitoring:

- A notification of monitoring will be submitted to the LWDB 30 business days prior to the monitoring being conducted. The notification will include a timeline and request for documentation needed to conduct monitoring.
- An entrance conference will take place on the first day of monitoring. The entrance conference will take place either in-person or by video technology. The entrance conference will outline the expectations and process that will take place during the monitoring review.
- Most of the monitoring will be conducted via desktop reviews and/or other virtual reviews. However, WFS staff will reserve time with the sub-recipient to conduct staff interviews to determine programs are operated within compliance and is operating effectively.
- After a review is conducted, an exit conference will be scheduled with the sub-recipient to present the results. Any findings or observations will be presented and discussed during this time.
- Within 30 business days of the exit conference, an official report will be provided to the sub-recipient that contains all findings and observations discussed during the exit conference. After this report is submitted, the sub-recipient must follow the established corrective action process.

**III. Collection of Monitoring Records**

The physical act of monitoring will be conducted by a range of staff from the LWDBs to WFS. However, all monitoring that is conducted will be submitted to the Program Integrity (PI) unit. This PI unit will collect all monitoring results conducted and maintain for a minimum of five (5) years.

**IV. Technical Assistance**

The results of monitoring will indicate the efficiencies or deficiencies of a sub-recipient. The information obtained from collecting and analyzing all monitoring results will influence the need for technical assistance. At the beginning of each quarter, technical assistance will be scheduled by the Strategic Improvement (SI) unit, in consultation with WFS subject matter experts, with the applicable sub-recipient(s) to address any deficiencies or share best practices discovered through monitoring.

The sub-recipients identified for technical assistance due to any deficiencies or findings found during monitoring must attend the scheduled times assigned to them.

#### **V. Corrective Action**

Monitoring conducted through annual reviews of fiscal and program requirements will participate in a corrective action process if the reviews result in a finding(s). After the monitoring review is conducted, an exit conference will be scheduled with the sub-recipient to discuss any findings or observations. An official written report will follow the exit conference to list out the findings and/or observations. This report will provide instruction on how, where, and when to submit a corrective action plan. The written report will be sent to the sub-recipient within 30 business days from the exit conference. After the report is received by the sub-recipient, they will have 30 business days to submit that information to [Workforce.Board@tn.gov](mailto:Workforce.Board@tn.gov). Any communication regarding the submitted Corrective Action Plan will need to be responded to within 30 business days.

Quarterly monitoring of data validation, programmatic, and fiscal reviews will not follow the above established process, unless otherwise stated. Any findings or observations will warrant a follow-up and immediate correction. However, if the finding during the quarterly or additional monitoring is considered egregious or significant, the above process related to annual reviews will be followed.

#### **VI. Additional Monitoring**

The State Workforce Development Board and WFS staff reserve the right to conduct additional monitoring outside the established procedures in this policy. Additional monitoring will only take place when there is reason to suspect that there are non-compliant practices occurring by the sub-recipient. If additional monitoring is conducted, the sub-recipient will be notified in writing to identify the reason and timeline to be established.

#### **VII. Local Policy Requirements**

Each LWDB must create a monitoring policy that describes the monitoring process at the local level. This policy must contain the following elements:

- The roles and functions of LWDBs, LWDB staff, and fiscal agents in their oversight or monitoring processes;
- Who, by title, is responsible for the monitoring of each program activity;
- The types of reports which will be prepared as a result of such monitoring;
- The scope and frequency of monitoring efforts for each program activity;
- The methods which will be used to monitor program activities;
- Who, by title, is responsible for ensuring corrective actions are taken when problems are found;
- The timeframe, in terms of calendar days or weeks, for completion of corrective actions;
- Guidelines for follow-through monitoring, when necessary, to determine if corrective action has been completed; and
- An appeal process for disagreements

#### **Attachments:**

Attachment A: **[Attachment Title]**

#### **References:**

**2 CFR Part 200; 20 CFR 683.400-420; 2 CFR part 2900; WIOA Sec. 188; TEGL 23-19;**



**Contact:**

For any questions related to this policy, please contact the Program Integrity Unit at [Workforce.Board@tn.gov](mailto:Workforce.Board@tn.gov).

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Tim Berry, State Workforce Development Board Chair

## **Workforce Services Policy – Data Validation**

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### **Executive Summary**

**1. What is the general purpose of this policy?**

To establish the framework, expectations and requirements for the data validation process. This will include specific details for each program on how its data will be validated.

**2. What are the notable guidelines conveyed within this policy?**

- Establishment of the local and State requirements for quarterly and annual data validation
- Establish the random sampling methodology
- Identify how records will be documented and maintained

**3. What must the Local Workforce Development Board do to meet the requirements of this policy?**

- Conduct data validation on a quarterly and annual basis
- Participate in annual training
- Respond timely to any corrective action needs

**4. How does this policy affect the workforce system?**

This policy establishes a framework on how each program will validate its data. The requirements and framework established in this policy will help ensure that all federal and State reporting will have integrity in its data.



STATE OF TENNESSEE  
**State Workforce Development Board**

220 French Landing Drive  
Nashville, TN 37243-1002  
(615) 741-0409

**Workforce Services Policy- Data Validation**

**Effective Date:** November 13, 2020

**Duration:** September 30, 2022

**Purpose:**

Data validation is a series of internal controls—or quality assurance techniques—to verify the accuracy, validity, and reliability of data. Data validation framework requires a consistent review across programs to ensure that all data consistently and accurately reflect the performance of each grant recipient. Data validation procedures:

- Verify that the performance data reported by grant recipients to the United States Department of Labor (USDOL) are valid, accurate, reliable, and comparable across programs;
- Identify anomalies in the data and resolve issues that may cause inaccurate reporting;
- Outline source documentation required for common data elements; and
- Improve program performance accountability through the results of data validation efforts.

**Scope:**

Office of the Governor, Tennessee Department of Labor and Workforce Development (TDLWD); Division of Workforce Services (WFS); Tennessee Department of Economic and Community Development (ECD); Tennessee Department of Education (TNED); Tennessee Department of Human Services (DHS); State Workforce Development Board (SWDB); Title I – Adult, Dislocated Worker, and Youth Programs, Title II – Adult Education and Family Literacy Act Program(AE); Title III – Wagner-Peyser Act Program (WP); Title IV – Vocational Rehabilitation Program (VR); Regional Planning Council (RPC); Local Workforce Development Boards (LWDB); Local Workforce Development Areas (LWDA); American Job Center (AJC); One-Stop Operator (OSO); Workforce System Sub-Recipients (Sub-Recipients); Workforce System Partners (Partners)

**I. Applicable Programs for Data Validation:**

The purpose of data validation is to validate the data of programs. All USDOL programs must be validated annually. Along with those required programs, the Tennessee Department of Labor and Workforce Development (TDLWD) will require additional programs operated by the Workforce Services (WFS) Division to undergo data validation. These programs include:

- Title I- Adult, Dislocated Worker, and Youth

- Title II- Adult Education and Family Literacy Act (AEFLA)
- Title III- Wagner-Peyser
- Trade Adjustment Assistance (TAA)
- Jobs for Veterans State Grants (JVSG)
- Senior Community Service Employment Program (SCSEP)
- Apprenticeship Program Grants
- National Dislocated Worker Grants (NDWG)
- H1-B Job Training Programs
- National Farmworker Jobs Program (NFJP)
- Reemployment Services and Eligibility Assessment (RESEA) Program
- Supplemental Nutrition Assistance Program- Employment & Training (SNAP E&T)
- Indian and Native American (INA) Program<sup>1</sup>
- Job Corps<sup>2</sup>
- Reentry Employment Opportunities (REO)<sup>3</sup>

## **II. Frequency of Data Validation:**

Data validation will be conducted by both the Workforce Services Division staff (WFS staff) and by each Local Workforce Development Board (LWDB). The frequency will be on a quarterly basis, culminating in an annual review.

### **A. Quarterly Data Validation:**

Both WFS staff and the LWDB will be responsible to conduct data validation on the applicable programs listed in this policy. Below are the responsibilities for each party to be done each quarter.

#### **1. LWDB Quarterly Responsibilities:**

Each LWDB will be responsible to conduct quarterly review of each program for which they are a sub-recipient of program funds. The results of their data validation must be submitted quarterly to the State Workforce Development Board (SWDB) along with LWDB's quarterly monitoring report.

The specific steps on conducting the review of each program will be listed in the attachments as well as be provided during staff training. The LWDB must conduct the number of reviews based on the sample size established by WFS. Notification of sample size will be sent to the LWDBs through a 'Notice of Data Validation' (Attachment A).

During the validation process, any files that contain data errors will be expected to be corrected within 30 business days after the submission of their quarterly monitoring report.

#### **2. WFS Quarterly Responsibilities:**

WFS staff will be responsible to conduct quarterly reviews on all programs listed in this policy. The results of the data validation from each program will be sent to the Program Integrity unit thirty (30) calendar days after the end of each quarter.

The specific steps on conducting the review of each program will be listed in the attachments as well as be provided during the staff training. WFS staff must conduct a quality review of the

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<sup>1</sup> Currently not operating this program

<sup>2</sup> Currently not operating this program

<sup>3</sup> Currently not operating this program

samples submitted by each LWDB. This sample size will be a reduced sample based on the number of samples reviewed by the LWDB.

During the validation process, any files that contain data errors will be expected to be corrected within 30 business days after the submission of the quarterly monitoring, as long as it is not past the allowable editable period.

#### **B. Annual Data Validation:**

At the end of each program year after the submission of the certified annual report, annual data validation classes are scheduled. These classes will consist of various staff members from each LWDA to include service providers, one-stop operator managers, and LWDB staff. Each LWDB will be required to provide a minimum number of staff (established by WFS) to participate in these classes. These classes will serve as a method to train LWDB staff and their contractors on data validation, as well as conduct data validation. Each LWDA will be required to use the samples from an LWDA that is not their own to conduct data validation. Before the data validation takes place, each LWDB staff member will receive training on required performance reporting, as well as a review of applicable documentation for data validation along with a validation tool. The annual data validation process is a four (4) week period.

The submitted annual report will be utilized to pull samples for these classes based on the established sample size for each program. The samples are organized into ten record sets. Each record is sorted vertically within the DEV sample tool established by TDLWD Performance staff. It includes the data element number that corresponds to the PIRL, a listing of appropriate documents and a list of the applicable programs for each data element.

Staff members who are participating in the Data Element Validation are to check each file in VOS to ensure that the appropriate documentation is present to support program eligibility, enrollment and service provision. After validation, the data elements are evaluated to determine which elements had the highest incidence of error. Each LWDB receives a report from WFS performance staff to identify where the highest error rates are so they can perform an internal audit of their files and make necessary corrections.

### **III. Random Sampling Methodology:**

Random sampling for the annual data validation review is conducted by first determining the proportionate number of enrollments in each program to the total number of enrollments in each program across the state. If a given area is responsible for 10 percent of the total enrollments for the state, then 10 percent of that area's total enrollments are counted. This is done to determine each area's proportion of the total. When each area's proportion is determined those numbers are totaled and divided by nine, rounded up, to determine how many records will be sampled by each area.

To select the sample, Performance staff sort the PIRL first by area, next by program and third by active or exited status. The desired number of records are manually chosen in a nonsequential, random fashion from the sorted PIRL for each area. For areas with programs that do not have enough participants to meet the sample size, one hundred percent of their files for that program will be included in the sample. The remaining number of files are then pulled from the area that contributed the largest percentage of enrollments.

**IV. Staff Training for Data Validation:**

All staff that conducts data validation throughout the year must receive training on how they are to validate each program's data. This training will be conducted, at a minimum, one (1) time per year by WIR<sup>2</sup>ED staff and program leads. The training will be conducted in-person at the TDLWD Central Office, unless travel restrictions prevent staff from attending. Otherwise, training will be conducted in a virtual setting utilizing video conferencing technology.

**V. Annual Report Validation:**

The annual report must be validated before it is submitted to USDOL. The report is validated through two methods as described below.

**A. Quarterly and Annual Data Validation:**

The first method for validating the annual report is through the records of the validation that has taken place quarterly and annually by program and LWDB staff.

**B. Quarterly Performance Reports:**

Before the quarterly submission of performance reports, the reports are processed, and run through a process of checks including valid values edit checks and logical rules edit checks in WIPS. If any records come back that need to be corrected, those errors are identified and assigned to the appropriate program staff for correction. The responsible staff will then review and make corrections within five (5) calendar days. After errors are corrected, the file is then re-processed and submitted in WIPS.

**VI. Documentation Process:**

All data validation records that are conducted quarterly and annually is maintained on internal servers by WFS. All reports are submitted to the Program Integrity unit to compile and maintain the data validation efforts.

**VII. Corrective Action:**

The data validation process is aligned with the overall monitoring process for the Workforce Services Division. Any issues identified through data validation will follow the established corrective action process in the Workforce Services policy for monitoring.

**Attachments:**

Attachment A: **[Attachment Title]**

**References:**

*TEGL 23-19 and TEGL 7-18*

**Contact:**

For any questions related to this policy, please contact the Program Integrity Unit at [Workforce.Board@tn.gov](mailto:Workforce.Board@tn.gov).

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Tim Berry, State Workforce Development Board Chair

## Workforce Services Policy – Grievance and Complaint Resolution

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### Executive Summary

**1. What is the general purpose of this policy?**

This policy differentiates complaints as they relate to four (4) separate categories:

- Complaints alleging discrimination or denial of equal opportunity;
- Complaints alleging unjust denial of WIOA services;
- Complaints alleging hostile work environment against employers that are not related to WIOA-funded programs or training; and
- Complaints made by staff within the LWDA against other LWDA staff or a sub-recipient entity.

**2. What are the notable guidelines conveyed within this policy?**

This policy also defines the process to receive, process, and follow up on complaints within Migrant Seasonal Farm Worker (MSFW) and American Job Center (AJC) complaint logs.

**3. Have there been any changes since the last policy? If so, describe the modification(s).**

Yes, the previous policy did not address how complaints among American Job Center staff will be adjudicated. Furthermore, the policy provides guidance regarding where to direct complaints that do not allege discrimination or denial of equal employment.

**4. What must the Local Workforce Development Board do to meet the requirements of this policy?**

Local Workforce Development Boards are expected to follow the procedures listed within this policy.

**5. How does this policy affect the workforce system?**

This policy defines how complaints from WIOA participants—especially those alleging discrimination or denial of equal opportunity—will be addressed by the workforce system. This ensures that eligible individuals will have equal access to programs and services provided using federal funds.



STATE OF TENNESSEE  
**State Workforce Development Board**

220 French Landing Drive, 4A  
Nashville, TN 37243-1002  
(615) 741-0409

**Workforce Services Policy- Grievance and Complaint Resolution**

**Effective Date:** November 13, 2020

**Duration:** September 30, 2022

**Purpose:**

WIOA mandates that each State and Local Workforce Development Board (LWDB) receiving an allotment under the Workforce Innovation and Opportunity Act (WIOA) establish and maintain a procedure for WIOA-related grievances or complaints. Complaints, other than discrimination complaints, must originate at the local level.

This policy also differentiates complaints as they relate to four (4) separate categories:

- Complaints alleging discrimination or denial of equal opportunity;
- Complaints alleging unjust denial of WIOA services;
- Complaints alleging hostile work environment against employers that are not related to WIOA-funded programs or training; and
- Complaints made by staff within the LWDA against other LWDA staff or a sub-recipient entity.

This policy outlines the process, including required documentation, to address complaints at the state and local levels.

**Scope:**

Office of the Governor, Tennessee Department of Labor and Workforce Development (TDLWD); Division of Workforce Services (WFS); Tennessee Department of Economic and Community Development (ECD); Tennessee Department of Education (TDOE); Tennessee Department of Human Services (DHS); State Workforce Development Board (SWDB); Title I – Adult, Dislocated Worker, and Youth Programs, Title II – Adult Education and Family Literacy Act Program(AE); Title III – Wagner-Peyser Act Program (WP); Title IV – Vocational Rehabilitation Program (VR); Regional Planning Council (RPC); Local Workforce Development Boards (LWDB); Local Workforce Development Areas (LWDA); American Job Center (AJC); One-Stop Operator (Operator); Workforce System Sub-Recipients (Sub-Recipients); Workforce System Partners (Partners).



## I. American Job Center and Migrant Seasonal Farm Worker Complaint Log:

The following list details requirements for American Job Center (AJC) Complaint Log submissions:

- Complaint logs must be sent for all comprehensive and affiliate AJCs within a LWDA.
- Complaint logs must be submitted for each quarter, regardless of whether any complaints were filed. Logs that do not reflect a complaint for the quarter must clearly state 'No complaints filed', or similar language, to indicate that the logs were not submitted with incomplete information. Blank logs will not be accepted.
- Complaint logs must identify the AJC city, reporting period, and reporting quarter. For example: "2019-2020 Q4 Knoxville Complaint Log"
- The complaint log must be cumulative for the fiscal year (October 1 to September 30). The same form must be used throughout the entire year, and updated as needed. For example, complaints that were indicated to be pending in previous quarters will be updated to reflect action steps or final resolution.
- The log must reflect the correct reporting period (listed below) and contain sufficient detail to identify:
  - Who filed the complaint, who received the complaint,
  - What the complaint alleges,
  - Where the complaint was filed, and
  - When the complaint was filed.
- The Local EO Officer must collect the AJC logs for each LWDA, then send them to [Workforce.Board@tn.gov](mailto:Workforce.Board@tn.gov).
- Logs sent directly from AJC Team Leads to the TDLWD Central Office will not be accepted.

Reporting periods and deadlines for complaint log submissions are as follows:

| Quarters  | Fiscal Year Reporting Periods | Deadlines for Submission |
|-----------|-------------------------------|--------------------------|
| Quarter 1 | October 1 to December 31      | January 30               |
| Quarter 2 | January 1 to March 31         | April 30                 |
| Quarter 3 | April 1 to June 31            | July 30                  |
| Quarter 4 | July 1 to September 31        | October 30               |

## II. Local-Level Complaint Requirements and Procedures:

### A. Local-Level Complaint Requirements<sup>1</sup>:

LWDBs must create a grievance and complaint policy explaining local-level procedures. This policy must provide:

- A process for dealing with grievances and complaints<sup>2</sup>, to include an opportunity for participants and other interested parties to allege: discrimination and denial of equal employment, unjust denial of WIOA services that are not discriminatory in nature, hostile work environment experienced during participation in a WIOA-funded program, other complaints against employers that relate to a WIOA-funded program, and complaints made by staff within the LWDA against either other staff or against a sub-recipient entity;
- An opportunity for informal resolution and a hearing to be completed within sixty (60) calendar days of filing the complaint<sup>3</sup>;
- A process which enables an individual as a party to a collective bargaining agreement, alleging

<sup>1</sup> 20 CFR 683.600(c)

<sup>2</sup> 20 CFR 683.600(c)(1)

<sup>3</sup> 20 CFR 683.600(c)(2)

- a labor standards violation, to submit the grievance to a binding-arbitration procedure<sup>4</sup>; and
- An opportunity for a local-level appeal to TDLWD Central Office staff when<sup>5</sup>:
  - No decision has been made within sixty (60) calendar days; or
  - Either party is dissatisfied with the local decision.

Grievances must be filed within one-hundred eighty (180) calendar days of the alleged occurrence<sup>6</sup>.

**B. Local-Level Staff Roles and Required Documentation Regarding Discrimination and Equal Employment:**

The Local Equal Opportunity Officer (Local EO Officer) must directly oversee, investigate, and document complaints alleging discrimination or denial of equal opportunity. Documentation must include, but is not limited to:

- Employment and Training Administration (ETA) Complaint/Apparent Violation Form;
- Email correspondence related to the complaint; and
- Meeting minutes regarding any in-person adjudication between LWDA staff and the complainant, if applicable.

An opportunity for a local-level appeal to TDLWD Central Office staff when<sup>7</sup>:

- No decision has been made within sixty (60) calendar days; or
- Either party is dissatisfied with the local decision.

**C. Local-Level Staff Roles and Required Documentation Regarding Denial of WIOA Services:**

The LWDB Staff Executive Director, or their designee, must directly oversee the adjudication process for complaints alleging unjust denial of WIOA services that do not allege discrimination or denial of equal opportunity. Documentation must include, but is not limited to:

- Employment and Training Administration (ETA) Complaint/Apparent Violation Form;
- Email correspondence related to the complaint; and
- Meeting minutes regarding any in-person adjudication between LWDA staff and the complainant, if applicable.

An opportunity for a local-level appeal to TDLWD Central Office staff when<sup>8</sup>:

- No decision has been made within sixty (60) calendar days; or
- Either party is dissatisfied with the local decision.

**D. Local-Level Staff Roles and Documentation Regarding Hostile Work Environment, Related to American Job Center Staff:**

The LWDB Staff Executive Director, or their designee, must directly oversee the adjudication process for complaints made by LWDA staff against other LWDA staff or a sub-recipient entity. Documentation must include, but is not limited to:

- Employment and Training Administration (ETA) Complaint/Apparent Violation Form;
- Email correspondence related to the complaint; and
- Meeting minutes regarding any in-person adjudication between LWDA staff and the complainant, if applicable.

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<sup>4</sup> 20 CFR 683.600(c)(3)

<sup>5</sup> 20 CFR 683.600(c)(4)

<sup>6</sup> 29 CFR 38.35

<sup>7</sup> 20 CFR 683.600(c)(4)

<sup>8</sup> 20 CFR 683.600(c)(4)

An opportunity for a local-level appeal to TDLWD Central Office staff when<sup>9</sup>:

- No decision has been made within sixty (60) calendar days; or
- Either party is dissatisfied with the local decision.

**E. Local-Level Staff Roles and Documentation Regarding Hostile Work Environment, Unrelated to American Job Center Staff:**

The One-Stop Operator (OSO) Director must ensure complaints alleging a hostile work environment or other unfair treatment by an employer are appropriately forwarded to either the Labor Standards Unit or the Tennessee Occupational Safety and Health Administration (TOSHA).

**A. Complaints to the Labor Standards Unit:**

- Request inspections of child-labor and non-smoker protection
- Processes claims for unpaid wages
- Investigate if there are allegations of unlawful hiring practices related to illegal aliens and whether workers are lawfully authorized to work.

More information can be accessed through the following link:

<https://www.tn.gov/workforce/employers/safety---health/regulations-compliance/regulations---compliance-redirect/labor-standards-unit.html>

**B. Complaints to TOSHA:**

- Request inspections if concerned with the possible existence of safety and health hazards.

More information can be accessed through the following link:

<https://www.tn.gov/workforce/employees/safety-health/tosha-redirect/file-a-safety-complaint.html>

The OSO Director must assist the complainant to file a complaint with the aforementioned organizations, to include follow up with the customer to confirm that transfer between organizations w. This process must be reflected in AJC Complaint Log and documentation must be maintained at the AJC.

**III. State-Level Complaint Procedures<sup>10</sup>:**

**A. State-Level Staff Roles and Required Documentation Regarding Discrimination and Denial of Equal Opportunity:**

In order to monitor discrimination, equal opportunity, and denial of WIOA service complaints, the State will use the following steps:

1. Program Integrity staff will collect AJC complaint log submissions on a quarterly basis to oversee when submission have been made, how resolution has progressed, and whether complaints were resolved according to regulations mandated by WIOA.
2. Program Integrity staff will monitor complaints to ensure that they do not exceed a sixty (60) calendar day limit without continued follow-up by appropriate LWDA staff<sup>11</sup>.
3. Program Integrity staff will remand complaints to the local-level<sup>12</sup> when there is insufficient

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<sup>9</sup> 20 CFR 683.600(c)(4)

<sup>10</sup> 20 CFR 683.600(d)

<sup>11</sup> 20 CFR 683.600(d)(4)

<sup>12</sup> 20 CFR 683.600(d)(3)

documentation to demonstrate that an opportunity for an informal hearing was offered. Complaints returned to the local-level will receive continued follow-up to ensure either resolution or proper escalation.

4. If the complaint has exceeded the sixty (60) calendar day resolution period<sup>13</sup>, or if either party is dissatisfied with the local-level decision and wishes to file an appeal, Program Integrity staff will request documentation to demonstrate how the complaint has been handled on the local-level. Staff will compare the provided documentation to the local grievance and complaint policy to determine whether the process was carried out according to local regulations.
5. The State EO Officer will investigate allegations of discrimination and denial of equal opportunity if all aforementioned procedures are exhausted, or an appeal has been requested. A decision will be made by the State EO Officer within sixty (60) calendar days of when documentation was received. The decision will be shared with the LWDB, LWDB Staff Executive Director, and the Local EO Officer.
6. The State EO Officer will provide an opportunity for a federal-level appeal concerning discrimination and denial of equal opportunity allegations when<sup>14</sup>:
  - No decision has been made within sixty (60) calendar days; or
  - Either party is dissatisfied with the state decision.

**B. State-Level Staff Roles and Required Documentation Regarding Denial of WIOA Services or Complaints Submitted by American Job Center Staff:**

In order to monitor discrimination, denial of equal opportunity, and denial of WIOA service complaints, the State will use the following steps:

1. Program Integrity staff will collect AJC complaint log submissions on a quarterly basis to oversee when submission have been made, how resolution has progressed, and whether complaints were resolved according to regulations mandated by WIOA.
2. Program Integrity staff will monitor complaints to ensure that they do not exceed a 60-day limit without continued follow-up by appropriate LWDA staff<sup>15</sup>.
3. Program Integrity staff will remand complaints to the local-level<sup>16</sup> when there is insufficient documentation to demonstrate that an opportunity for an informal hearing was offered. Complaints returned to the local-level will receive continued follow-up to ensure either resolution or proper escalation.
4. If the complaint has exceeded the sixty (60) calendar day resolution period<sup>17</sup>, or if either party is dissatisfied with the local-level decision and wishes to file an appeal, Program Integrity staff will request documentation to demonstrate how the complaint has been handled on the local-level. Staff will compare the provided documentation to the local grievance and complaint policy to determine whether the process was carried out according to local regulations.
5. The TDLWD Workforce Services Director of Program Integrity, or their designee, will investigate allegations of unjust denial of WIOA services and internal complaints made by LWDA staff against other staff or a sub-recipient entity in the event that all aforementioned procedures are exhausted, or an appeal has been requested. In cases that allege discrimination or denial of Equal Opportunity, the TDLWD HR Director will lead the investigation. A decision will be made by the Program Integrity Director within sixty (60) calendar days of when documentation was received. The decision will be shared with the

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<sup>13</sup> 20 CFR 683.600(d)(4)

<sup>14</sup> 20 CFR 683.600(d)(5)

<sup>15</sup> 20 CFR 683.600(d)(1)

<sup>16</sup> 20 CFR 683.600(d)(3)

<sup>17</sup> 20 CFR 683.600(d)(4)

LWDB, LWDB Staff Executive Director, and the Local EO Officer.

6. Decisions made by the Workforce Services Program Integrity Director will be considered final and will not be subject to appeal.

**C. State-Level Staff Roles and Documentation Regarding Hostile Work Environment or Employer-Related Complaints:**

Program Integrity staff will not investigate complaints alleging unfair work practices or those made against an employer unless the complaint is directly related to WIOA-funded activities. Such complaints will be directed to the following entities:

**A. Complaints to the Labor Standards Unit:**

- Request inspections of child-labor and non-smoker protection
- Process claims for unpaid wages
- Investigate if there are allegations of unlawful hiring practices related to illegal aliens and whether workers are lawfully authorized to work.

More information can be accessed through the following link:

<https://www.tn.gov/workforce/employers/safety---health/regulations-compliance/regulations---compliance-redirect/labor-standards-unit.html>

**B. Complaints to TOSHA:**

- Request inspections if concerned with the possible existence of safety and health hazards.

More information can be accessed through the following link:

<https://www.tn.gov/workforce/employees/safety-health/tosha-redirect/file-a-safety-complaint.html>

**IV. Federal-Level Complaint Procedures<sup>18</sup>:**

- The Secretary investigates allegations arising through the grievance procedures<sup>19</sup> when:
  - A decision on a grievance or complaint under 20 CFR 683.600(d) has not been reached within sixty (60) calendar days of receipt of the grievance or complaint or within sixty (60) calendar days of receipt of the request for appeal of a local level grievance and either party appeals to the Secretary; or
  - A decision on a grievance or complaint under 20 CFR 683.600(d) has been reached and the party wishes to appeal to the Secretary.
- The Secretary must make a final decision on an appeal under paragraph (1) of this section no later than 120 calendar days after receiving the appeal.
- Appeals made under paragraph (1)(ii) of this section must be filed within sixty (60) calendar days of the receipt of the decision being appealed. Appeals made under paragraph (1)(i) of this section must be filed within one-hundred twenty (120) calendar days of the filing of the grievance with the State, or the filing of the appeal of a local grievance with the State. All appeals must be submitted by certified mail, return receipt requested, to the Secretary, U.S. Department of Labor, 200 Constitution Ave. NW., Washington, DC 20210, Attention: ASET. A copy of the appeal must be simultaneously provided to the appropriate ETA Regional Administrator and the opposing party.

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<sup>18</sup> 20 CFR 683.610

<sup>19</sup> 20 CFR 683.600

- Except for complaints arising under WIOA Section 184(f) or WIOA Section 188, grievances or complaints made directly to the Secretary will be referred to the appropriate State or local area for resolution in accordance with this section, unless the Department notifies the parties that the Department of Labor will investigate the grievance under the procedures at 20 CFR 683.430.

## **V. Reporting Fraud, Waste, and Abuse:**

Information and complaints involving criminal fraud, abuse, or other criminal activity must be reported immediately in one of three ways<sup>20</sup>:

### **A. Tennessee Comptroller of Treasury:**

Contact the Fraud, Waste and Abuse Hotline at 1 (800) 232-5454.

### **B. Office of Investigations, Region 3**

Send an Incident Report to:

Atlanta Regional Office

Office of Investigations: United States Department of Labor

61 Forsyth Street Southwest

Room 6T1

Atlanta, GA 30303

### **C. Office of Investigations:**

Send an Incident Report to:

Inspector General

Office of Investigations (OIG) Room S5514

U.S. Department of Labor

200 Constitution Avenue, Northwest

Washington, DC 20210

### **D. Employment and Training Administration:**

Simultaneously provide a copy of the Office of Investigations Incident Report to: <https://www.oig.dol.gov/contact.htm> or call 1 (800) 347-3756.

### **Contact:**

For any questions related to this policy, please contact the Program Integrity Unit at [Workforce.Board@tn.gov](mailto:Workforce.Board@tn.gov).

### **References:**

20 CFR 683.600, 683.600(c), 683.600(c)(1), 683.600(c)(2), 683.600(c)(3), 683.600(c)(4), 683.600(d)(1), 683.600(d)(3), 683.600(d)(4), 683.600(d)(5); 20 CFR 683.610; 20 CFR 683.620; 29 CFR 38.35

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Tim Berry, State Workforce Development Board Chair

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<sup>20</sup> 20 CFR 683.620

## Workforce Services Policy – Pre-Apprenticeship

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### Executive Summary

**1. What is the general purpose of this policy?**

This policy establishes a framework, consistent with federal guidance, to certify pre-apprenticeships and have a facilitated entry and/or articulation agreement in place with a Registered Apprenticeship Program (RAP) or Industry Recognized Apprenticeship Program (IRAP). This certification process is being developed to prevent individuals from attending pre-apprenticeship programs that do not follow federal guidance and do not lead to a RAP, IRAP, or sustainable employment.

**2. What are the notable guidelines conveyed within this policy?**

The Apprenticeship Office (AO) will vet pre-apprenticeships, and if aligned with TEN 13-12, the state will issue a certification to the training provider. This is a Tennessee developed process and the certified pre-apprenticeship programs will only be certified for the State of Tennessee.

**3. What must the Local Workforce Development Board do to meet the requirements of this policy?**

There is no requirement for the Local Workforce Board; all vetted and certifications will be awarded through the Workforces Service's Apprenticeship Office.

**4. How does this policy affect the workforce system?**

Strengthens pre-apprenticeship programs to create a direct talent pipeline into a Registered Apprenticeship Program.



STATE OF TENNESSEE  
**State Workforce Development Board**

220 French Landing Drive, 4A  
Nashville, TN 37243-1002  
(615) 741-0409

**Workforce Services Policy- Pre-Apprenticeship**

**Effective Date:** November 13, 2020

**Duration:** June 30, 2022

**Purpose:**

This policy establishes a framework, consistent with federal guidance<sup>1</sup>, to certify pre-apprenticeships and have a facilitated entry and/or articulation agreement in place with a Registered Apprenticeship Program (RAP) or Industry Recognized Apprenticeship Program (IRAP). This certification process is being developed to prevent individuals from attending pre-apprenticeship programs that do not follow federal guidance and do not lead to a RAP, IRAP, or sustainable employment.

**Scope:**

Office of the Governor, Tennessee Department of Labor and Workforce Development (TDLWD); Division of Workforce Services (WFS); Tennessee Department of Economic and Community Development (ECD); Tennessee Department of Education (TDOE); Tennessee Department of Human Services (DHS); State Workforce Development Board (SWDB); Title I – Adult, Dislocated Worker, and Youth Programs, Title II – Adult Education and Family Literacy Act Program(AE); Title III – Wagner-Peyser Act Program (WP); Title IV – Vocational Rehabilitation Program (VR); Regional Planning Council (RPC); Local Workforce Development Boards (LWDB); Local Workforce Development Areas (LWDA); American Job Center (AJC); One-Stop Operator (OSO); Workforce System Sub-Recipients (Sub-Recipients); Workforce System Partners (Partners)

**I. Framework for a Certified Pre-Apprenticeship Programs**

All Pre-Apprenticeship programs that are certified by the Tennessee Department of Labor's (TDLWD) Apprenticeship Office (AO) will include the elements of a quality pre-apprenticeship program. The elements that define a quality pre-apprenticeship are:

- Approved training curriculum
- Strategies for long-term success
- Access to appropriate support services

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<sup>1</sup> TEN 13-12



- Promotes greater use of RAPs and IRAPs to increase future opportunities
- Meaningful hands-on training that does not displace paid employees
- Facilitated entry and/or articulation

Once a Pre-Apprenticeship program meets the certification standards, as established in section II, it will be displayed on the ApprenticeshipTN website and the RAPs with which they have articulation agreements.

## **II. Responsibilities for Certification**

### **A. Application for Certification**

All programs wishing to become certified must submit applications to the State's AO. The application will be posted on the ApprenticeshipTN website and will contain the following required fields:

- Organization name
- Program manager contact information (name, phone, email)
- Detailed training curriculum
- Access to appropriate support services
- Strategies for long-term success
- Meaningful hands-on training that does not displace paid Employees
- Facilitated Entry and/or articulation agreements with Registered Apprenticeship Programs.

### **B. Certification Process**

The State's AO will review each application and determine if all required Pre-Apprenticeship elements are established.

1. If the requirements are met, State Certification will be awarded to the entity applying.
  - i. All Pre-Apprenticeship programs will be required to provide information on apprentices for tracking purposes to the AO
  - ii. Required notification, by email, to [Apprenticeship.tn@tn.gov](mailto:Apprenticeship.tn@tn.gov) for any additional employer articulation agreements within 30 days of the agreement date.
2. If the requirements are not met, the entity will be notified of incomplete information and be provided a deadline for submission. If the information is not received by the deadline, then the application will be denied. Justification for denial will be documented and shared with the applying entity.

## **III. Monitoring Process**

To maintain an effective and compliant Pre-Apprenticeship Program, the AO will conduct monitoring on an annual basis, at a minimum. This monitoring will allow the AO to identify potential compliance issues, track progress on completers, and track hiring rates. The annual monitoring will include issuing an annual notification with a questionnaire. This questionnaire will allow the Certified Pre-Apprenticeship program to provide any curriculum changes and the reason for the changes. The notification will also serve as an "Intent to Continue" as a Certified Pre-Apprenticeship program, and all certified programs will be required to respond to an annual reporting questionnaire. All notifications and submission of questionnaires will be conducted through email, [Apprenticeship.tn@tn.gov](mailto:Apprenticeship.tn@tn.gov).

#### **IV. Report Process**

To maintain an effective and compliant Pre-Apprenticeship program, the AO will produce quarterly measures on the numbers of pre-apprentices enrolled in Certified Pre-Apprenticeship programs and hiring rates. Pre-apprentices will be cross-referenced with apprentice data in the U. S. Department of Labor system to verify hires into RAPs and IRAPs.

The State's AO will verify the information entered in the state and the U. S. Department of Labor systems for the individual apprentices and pre-apprentices where applicable. Failure to provide notices, as requested, submit annual questionnaire responses, or provide pre-apprentice information to the AO will result in loss of certification status.

#### **References:**

TEN 13-12

#### **Contact:**

For any questions related to this policy, please contact the Program Integrity Unit at [Workforce.Board@tn.gov](mailto:Workforce.Board@tn.gov).

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Tim Berry, State Workforce Development Board Chair

**West TN & NW KPIs**  
**January - September 2020 Results**

| Program   | West TN Goal | NW Target | % of Regional Goal | Q1 Goals | Q1, Jan. - Mar. Results | SWDB Results* | Q2 Goals | Q2, Apr. - Jun Results | SWDB Results | SWDB YTD Total | Q3 Goals | Q3, July - Sept. Results | SWDB Results | Q4 Goals | YTD Total | YTD % |
|---|--------------|-----------|--------------------|----------|-------------------------|---------------|----------|------------------------|--------------|----------------|----------|--------------------------|--------------|----------|-----------|-------|
| Adult and Dislocated Worker New Enrollments     | 1,877        | 380       | 20%                | 68       | 209                     | 91            | 118      | 53                     | 53           | 144            | 123      | 137                      |              | 71       | 281       | 74%   |
| Youth New Enrollments                           | 857          | 107       | 12%                | 25       | 8                       | 8             | 47       | 2                      | 2            | 10             | 21       | 30                       |              | 14       | 40        | 37%   |
| Wagner Peyser New Enrollments                   | 9,410        | 2,007     | 21%                | 606      | 204                     | 204           | 524      | 38                     | 45           | 249            | 440      | 211                      |              | 437      | 460       | 23%   |
| RESEA Co-Enrollments                            | 170          | 15        | 9%                 | 3        | 1                       | 0             | 4        | 1                      | 1            | 1              | 4        | 0                        |              | 4        | 1         | 7%    |
| SNAP E&T New Enrollments                        | 570          | 103       | 18%                | 26       | 17                      | 32            | 26       | 27                     | 27           | 59             | 26       | 33                       |              | 25       | 92        | 89%   |
| TAA Co-Enrollments                              | 50.0%        | 50.0%     | n/a                | 50.0%    | 1.7%                    | 1.7%          | 50.0%    | 6.35%                  | 6.3%         | 6.3%           | 50.0%    | 23.4%                    |              | 50.0%    | 23.4%     | 47%   |
| Jobs for Veterans State Grants New Enrollments  | 100          | 25        | 25%                | 6        | 7                       | 0             | 6        | 1                      | 1            | 1              | 6        | 0                        |              | 7        | 1         | 4%    |
| Migrant and Seasonal Farmworker New Enrollments | 39           | 21        | 54%                | 5        | 0                       | 5             | 5        | 19                     | 19           | 24             | 6        | 16                       |              | 5        | 40        | 190%  |
| Re-Entry New Enrollments (all partners)         | 707          | 309       | 44%                | 77       | 56                      | 58            | 77       | 2                      | 2            | 60             | 77       | 24                       |              | 78       | 84        | 27%   |
| SCSEP -TNSCA (Exits)                            | n/a          | 19        | n/a                | 5        | 5                       | 5             | 5        | 0                      | 0            | 5              | 5        | 0                        |              | 4        | 5         | 26%   |
| Adult Ed. - Jackson State Community College*    | n/a          | 265       | n/a                | 107      | 41                      | 144           | 75       | 12                     | 254          | 398            | 41       | 107                      |              | 42       | 505       | 191%  |
| Adult Ed. - Weakley County Schools              | n/a          | 333       | n/a                | 95       | 78                      | 119           | 59       | 21                     | 224          | 343            | 89       | 95                       |              | 90       | 438       | 132%  |

\*includes NW and SW

\*revised 7/7

Title I and Title III Only