

**Northwest TN Workforce Board  
Executive Committee  
January 27, 2021 – 10:00 a.m.  
Zoom Meeting**

**Minutes**

**Committee Members:** Rita Alexander, Neely Ashby, Ted Piazza, Mayor Gary Reasons, Jimmy Williamson  
**Staff Members:** Jennifer Bane, Lana Burchfiel, Gina Johnson, LeAnn Lundberg, 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 10-28-20 Executive Meeting were reviewed.

- **MOTION:** Mayor Gary Reasons moved to approve the 10-28-20 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:

- **ADA Survey Results Updates:** Dyersburg State is ready to do the parking lot, and LeAnn has contacted Union City Paving to complete when weather permitting.

**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 including One-Stop Operator (OSO) and Career Service Provider (CSP) monitoring results. There have not been any issues.
- **Local Performance-Estimated PY 20 Q2 Results:** The attached handout details the estimated performance results for the second quarter of PY 20. All goals are exceeding 100% except for wages for DW, which is still above the required 90% threshold. These amounts will most likely come up before we have final results in a few weeks.
- **PAR Update:** We are awaiting a final report and an exit conference. There were two items that were questioned, including the use of the Language Line for interpretation services instead of the state's contracted provider and the purchase of pens, notepads, USB drives, and plastic bags for the career exploration events funded through the state's Youth demonstration grants. We have used Language Line for at least 15 years and were under the impression that the state contract could only be used by state staff. Prior to submitting a request for funds, we asked if the questioned items could be purchased and were told it was allowable. The request for funds clearly stated the items to be purchased and the purpose for those items. The request was approved by the state Workforce Services staff, who think the purchases were allowable, but the PAR staff are questioning if they should have been allowed costs.

**Budget & Administration Update:**

- **Financial Status Report:** Gina Johnson presented the attached Financial Status Report as of December 31, 2020. We have expended 24.24% of our program funds on participant funds and expended 60.87% of our total formula program funds in total. We have met and exceeded the requirements for minimum participant cost rate (MPCR) at 43.1%, PY 19 Out-of-School Youth (OSY) expenditures, work experience expenditures, and obligation rates. The In-School Youth expenditure rate for PY 20 funds must be at least 35%, and we are currently at about 26%. This is a huge increase from last year when we had about 6% for the whole year.

- Budget Update: Jennifer Bane reviewed the attached report ending December 31, 2020. We've had several additional grants including the CARES Reemployment funds and Consolidated Business Grants. The grants were set to expire end of December, but the state extended these funds through the end of April. So far our formula participant and operating expenses are coming in under budget. Our RESEA was 77% expended but the grant, which was originally supposed to end in September, was extended to December 31<sup>st</sup> and now June 30, 2021. We have requested additional funds to sustain operations through June 30<sup>th</sup>. Our administration expenses is slightly over-budget so far with 55% expended.

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

- Monitoring Policy Changes (Vote Required): There are a few minor changes such as title changes. We also added information regarding quarterly data validation submissions to the state and information about the state's new process for quarterly monitoring. All changes are noted in red.
  - **MOTION: Jimmy moved to approve the Monitoring Policy changes as presented and Rita Alexander seconded the motion. All were in favor and the motion carried.**
- Grievance & Complaints Policy Changes (Vote Required): The state added several different kinds of complaints to their policy, so we added their policy changes to ours. All changes are noted in red.
  - **MOTION: Mayor Gary Reasons moved to approve the Grievance & Complaints Policy changes as presented and Jimmy seconded the motion. All were in favor and the motion carried.**
- Targets for Key Performance Indicators (KPIs): We had our negotiations with the state for 2021 goals, and changes are reflected in the attached revised KPI goals report. Once negotiations are completed with each local area, we will receive our finalized goals.
- The Humboldt AJC is now open after being closed on Monday for sprinkler maintenance issues.

**Future Meeting Dates & Upcoming Events**:

- Conflict of Interest Forms: Due February 26th
- Next Board Meeting: Tuesday, February 23rd at 11:30 am (Zoom)
- State Board Meeting: March 26th (TBD)
- Remaining 2021 Committee Meeting Dates: Wednesday, 10:00 am –
  - April 28th
  - July 28th
  - October 27<sup>th</sup>

Respectfully submitted,

Lana Burchfiel, Public Information Specialist

**Northwest TN Workforce Board**  
**Executive Committee**  
January 27, 2021 – 10:00 a.m.

Join Zoom Meeting:

<https://us02web.zoom.us/j/85452077904?pwd=czd2VnV0eDIJUTQ0MnN5MEpPb3MwQT09>

Meeting ID: 854 5207 7904

Passcode: 920569

**Agenda**

- |   |                   |
|---|-------------------|
| Welcome and Call to Order   | Ted Piazza, Chair |
| Review and Approval of Minutes of 10-28-20 Meeting <b>(Vote Required)</b>   |                   |
| Facilities and Technology Update  | LeAnn Lundberg    |
| • ADA Survey Results Updates  |                   |
| Performance & Program Oversight   | Laura Speer       |
| • Quarterly Complaint Logs Update   |                   |
| • Monitoring Status Report  |                   |
| ○ One-Stop Operator & Career Service Provider Monitoring                    |                   |
| • Local Performance – Estimated PY 20 Q2 Results                            |                   |
| Budget & Administration Update  |                   |
| • Financial Status Report   | Gina Johnson      |
| • Budget Update   | Jennifer Bane     |
| Other   | Jennifer Bane     |
| • Monitoring Policy Changes <b>(Vote Required)</b>                          |                   |
| • Grievance & Complaints Policy Changes <b>(Vote Required)</b>              |                   |
| • Targets for Key Performance Indicators (KPIs)                             |                   |
| Future Meeting Dates & Upcoming Events                                      |                   |
| • <b>Conflict of Interest Forms: Due February 26<sup>th</sup></b>           |                   |
| • Next Board Meeting: Tuesday, February 23 <sup>rd</sup> at 11:30 am (Zoom) |                   |
| • State Board Meeting: March 26 <sup>th</sup> (TBD)                         |                   |
| • Remaining 2021 Committee Meeting Dates: Wednesday, 10:00 am –             |                   |
| ○ April 28 <sup>th</sup>  |                   |
| ○ July 28 <sup>th</sup>   |                   |
| ○ October 27 <sup>th</sup>  |                   |

**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 MONITORING STATUS REPORT

Subcontractor	Purpose of Subcontract	Scheduled	Date of Review (s)	Corrective Action Needed	Letter Mailed:
2007-2107-OJT-61-1350626 Amteck, LLC 1106 East Court Street Dyersburg, TN 38024 Stephanie Ballard, Administrative Assistant (731) 286-2772 <a href="mailto:sbaard@amteck.com">sbaard@amteck.com</a>	On-the-Job Training: 07-27-20 to 07-02-21	Scheduled: 09-10-20	Phone Interview: 09-10-20 Fiscal: 10-27-20	Programmatic: The activity dates were keyed incorrectly by the CA and the dates had to be adjusted. ** This was corrected.	Letter Mailed: 11-11-2020
2011-2105-OJT-26-2616743 Ellis Mechanical, LLC Attn: Andrew Watts, Accounts Receivable 1227 Hwy. 641 South Paris, TN 38242 (731) 207-0195 <a href="mailto:andrew.watts@ellisheatingcompany.com">andrew.watts@ellisheatingcompany.com</a>	On-the-Job Training: 11-20-20 to 05-01-21	Scheduled: 12-15-20	Phone Interview: 12-15-20 Fiscal:	Programmatic:	Letter Mailed:
2010-2107-OJT-62-6007078 Henry County Medical Center/Henry County General Hospital 301 Tyson Avenue Paris, TN 38242 (731) 644-8472 Billie McKee <a href="mailto:bmckee@hcmc-tn.org">bmckee@hcmc-tn.org</a>	On-the-Job Training: 10-11-20 to 07-01-21	Scheduled: 11-11-20	Phone Interview: 11-11-2020 Fiscal:	Programmatic:	Letter Mailed:
2008-2107-OJT-45-5067121 Twin Oaks Technology, LLC 1046 Broadway Street Martin, TN 38237 Nicole Kincaid, COO (731) 281-1212 <a href="mailto:nicole.kincade@twinoakstech.com">nicole.kincade@twinoakstech.com</a>	On-the-Job Training: 08-19-20 to 07-01-21	Scheduled: 09-10-20	Phone Interview: 09-10-20 Fiscal: 11-11-2020	Programmatic: The Needs Assessment was dated prior to the completion of the OJT Hours. The BSC has been requested to have the Needs Assessment sign and dated with a date on or after the completion of the OJT Hours. ** This was corrected	Letter Mailed: 11-16-2020
2008-2106-OJT-26-1531856 Dana Sealing Products, LLC 100 Plumley Drive Paris, TN 38242 (419) 887-3000 Mr. Joseph Heckendorn <a href="mailto:joseph.heckendorn@dana.com">joseph.heckendorn@dana.com</a>	On-the-Job Training: 08-31-20 to 06-01-21	Scheduled: 10-21-20	Phone Interview: 10-21-20 Fiscal:	Programmatic:	Letter Mailed:

2008-2101-OJT-62-1727136 CableSouth Media III dba Swyft Connect, LLC 1056 Jones Blvd. P.O. Box 620 Milan, TN 38358 Brian Forrest bforrest@cablesouth.com (731) 693-8593	On-the-Job Training: 08-31-20 to 01-01-21	Scheduled: 09-28-20	Phone Interview: 09-28-20 Fiscal:	Programmatic:	Letter Mailed:
2009-2109-OJT-26-0783940 Crown Partners, LLC dba Crown Winery, LLC Attn: Dawn Fallert 2638 E. Mitchell Street Humboldt, TN 38343 (731) 784-8100 thecrownwinery@gmail.com	On-the-Job Training: 09-06-20 to 09-06-21	Scheduled: 11-19-20	Phone Interview: 11-19-20 Fiscal:	Programmatic: The hourly rate was incorrect on the needs assessment. The incorrect amount was \$11 and the correct amount is \$10 per hour after speaking with the HR Manager. ** This was corrected	Letter Mailed:
2007-2104-OJT-94-3273443 ABB Enterprise Software 1133 South Cavalier Drive Alamo, TN 38001 731-696-5212 Ulikia Turner, Administrative Assistant ulikia.turner@us.abb.com	On-the-Job Training: 07-06-20 to 04-01-21	Scheduled:	Phone Interview: 12-18-2020 Fiscal:	Programmatic:	Letter Mailed:
2007-2105-OJT-85-0837531 Allied Memory Foam, LLC dba HLJ Foam Product, LLC 3014 Kefauver Drive Milan, TN 38358 (731) 686-0821 hchicas@memoryfoam.com Hector Chicas	On-the-Job Training: 07-17-20 to 05-12-21	Scheduled: 08-20-20	Phone Interview: 08-20-20 Fiscal: 11-19-2020	Programmatic:	Letter Mailed: 11-20-2020
2007-2107-OJT-62-6000282 City of Dyersburg Sue Teague, HR Manager 425 West Court Street Dyersburg, TN 38024 (731) 288-7607 steague@dyersburgtg.gov	On-the-Job Training: 07-10-20 to 07-01-21	Scheduled: 10-20-20	Phone Interview: 10-20-20 Fiscal:	Programmatic:	Letter Mailed:
2006-2106-OJT-82-5179383 West TN Healthcare Dyersburg Beverly Ray, Manager HR 400 East Tickle Street Dyersburg, TN 38024 (731) 288-3608 beverly.ray@wth.org	On-the-Job Training: 06-26-20 to 06-26-21	Scheduled: 09-09-20	Phone Interview: 09-09-20 Fiscal: 10-23-20	Programmatic:	Letter Mailed: 10-26-20

2003-2101-OJT-84-4597398 Alliance Staffing Group, LLC 107 S. Courthouse Square Suite 209 Trenton, TN 38382 Mr. David Webb or Lisa Patterson (731) 316-9284 <a href="mailto:L.patterson@alliancestaffing.com">L.patterson@alliancestaffing.com</a>	On-the-Job Training: 03-12-20 to 02-24-21	Scheduled: 09-15-20	Phone Interview: 09-15-20 Fiscal: 10-28-2020	Programmatic: The company signatory authority failed to date the WIOA OJT Needs Assessment to determine if it was dated by the 20th of the following month of the completion of training. Also, the BSC failed to make a mid-point contact with the participant.	Letter Mailed: 10-28-2020
2003-2012-OJT-62-1380826 PML, Inc. 75 County Home Road Paris, TN 38242 (731) 642-7398 ext. 241 Kelly Cherry, HR Manager <a href="mailto:kcherry@pmlmarugo.com">kcherry@pmlmarugo.com</a>	On-the-Job Training: 3-16-20 to 12-31-20	Scheduled:	Phone Interview: 12-16-20 Fiscal:	Programmatic:	Letter Mailed:

### RFP CONTRACTS THROUGH

1909-2009-OSO-62-0923487- SHARE Mid-Cumberland Human Resource Agency 1101 Kermit Drive, Suite 300 Nashville, TN 37217 <a href="mailto:jhamrick@mchra.com">jhamrick@mchra.com</a> (615) 850-3907	One-Stop Operator Services: 09-16-19 to 06-30-21	Expires: 06-30-2021	Fiscal:	Invoices Checked Monthly per Executive Director	Letter Mailed:
1910-2009-CSP-62-0800930-MULTI Dyersburg State Community College 1510 Lake Road Dyersburg, TN 38024 Dr. Karen Bowyer, President	Career and Business Services	Dates: 10-01-19 to 06-30-21	Fiscal:	Invoices Checked Monthly per Executive Director	Letter Mailed:

### INCUMBENT WORKER TRAINING (September 1, 2020 through December 31, 2020)

2009-20212-IWT-45-5356855-CB Southern Chiropractic and Acupuncture 159 Court Square Huntingdon, TN 38344 (731) 535-3205 <a href="mailto:dr.jrustancgrady@gmail.com">dr.jrustancgrady@gmail.com</a>	Incumbent Worker	Dates: 09-25-20 to 12-15-20	Fiscal: 12-17-2020	\$15,066.43	Letter Mailed: 12-22-2020
2010-2011-IWT-39-0402810-CB Kohler Company Jeff Bennett 2000 North 5th Street Union City, TN 38261 (731) 885-1200 <a href="mailto:jeff.bennett@kohler.com">jeff.bennett@kohler.com</a>	Incumbent Worker	Dates: 10-05-20 to 11-02-20	Fiscal: 12-17-2020	\$25,000.00	Letter Mailed: 12-22-2020



2010-2011-IWT-62-1814311-CB Colonial Diversified Polymer Products 2055 Forrest Street Dyersburg, TN 38024 (731) 287-3636 Elizabeth Byars lbyars@colonialdpp.com	Incumbent Worker	Dates: 10-05-20 to 11-30-20	Fiscal: 12-17-2020	\$18,500.00	Letter Mailed: 12-22-2020
2010-2011-IWT-62-0819507-CB Cox Oil Co., Inc. 623 Perkins Street Union City, TN 38261 731.885.6444 Cassie Hickey cassie.hickey@coxoil.com	Incumbent Worker	Dates: 10-06-20 to 11-16-20	Fiscal: 12-17-2020	\$988.00	Letter Mailed: 12-22-2020
2010-2011-IWT-62-11401109-CB Maverick, Inc. Cassie Davis 623 Perkins Street Union City, TN 38261 (731) 885-2784 Cassie.davis@coxoil.com	Incumbent Worker	Dates: 10-06-20 to 11-16-20	Fiscal: 12-02-2020	\$443.35	Letter Mailed: 12-04-2020
2010-2012-IWT-84-4597398-CB Alliance Staffing Group, LLC 107 S. Courthouse Square Suite 209 Trenton, TN 38382 Mr. David Webb or Lisa Patterson (731) 316-9284 l.paterson@alliancestaffing.com	Incumbent Worker	Dates: 10-01-20 to 12-15-20	Fiscal: 12-02-2020	\$600.00	Letter Mailed: 12-04-2020

PY20 Q2 WIOA Core Performance Measures			
	47145 Northwest Tennessee		
Adult Measures	Pass/Fail		Pass
	Negotiated	Actual	% of Goal
Exiters	0	285	
Participants Served	0	584	
EER 2nd Qtr after exit	82%	88.3%	107.7%
EER 4th Qtr after exit	82%	81.9%	99.88%
Med. Earnings	\$ 6,650.00	\$ 6,758.98	101.64%
Cred. Attainment	63%	87.3%	138.57%
MSG	52%	56.4%	108.42%
Dislocated Worker	Pass/Fail		Pass
	Negotiated	Actual	% of Goal
Exiters	0	38	
Participants Served	0	93	
EER 2nd Qtr after exit	82%	93.20%	113.66%
EER 4th Qtr after exit	82%	86.80%	105.85%
Med. Earnings	\$ 7,600.00	\$ 7,076.57	93.11%
Cred. Attainment	66%	95.5%	144.70%
MSG	48%	66.7%	138.88%
Youth	Pass/Fail		Pass
	Negotiated	Actual	% of Goal
Exiters	0	53	
Participants Served	0	97	
EER 2nd Qtr after exit	76%	85.00%	111.84%
EER 4th Qtr after exit	75%	76.1%	101.47%
Med. Earnings	\$ 3,300.00	\$ 3,763.71	114.05%
Cred. Attainment	69%	79%	114.93%
MSG	45%	56.0%	124.44%

FINANCIAL STATUS REPORT FOR MONTH ENDING 12/31/2020								
	CONTRACT BUDGET 12/31/2020	CUM. EXPENSE 12/31/2020	CURRENT MO ACCRUALS 12/31/2020	TOTAL EXP/ACCR 12/31/2020	OBLIGATIONS 12/31/2020	TOTAL EXP ACCR & OBLG 12/31/2020	DEOBLIGATED FUNDS 12/31/2020	UNOBLIGATED BALANCE 12/31/2020
AS OF DATE								
FORMULA PROGRAM FUNDS				invoiced not pd	July-Jan 18 not pd			
ADULT OPERATIONS	\$ 774,681.02	\$ 560,052.23	\$ 38,054.17	\$ 598,106.40	\$ 350,844.82	\$ 948,951.22	\$ -	\$ (174,270.20)
ADULT PARTICIPANT	\$ 516,454.02	\$ 205,959.21	\$ 6,355.02	\$ 212,314.23	\$ 129,869.59	\$ 342,183.82	\$ -	\$ 174,270.20
ADULT TOTAL	\$ 1,291,135.04	\$ 766,011.44	\$ 44,409.19	\$ 810,420.63	\$ 480,714.41	\$ 1,291,135.04	\$ -	\$ 0.00
PERCENTAGE PARTICIPANT	40.00%	26.89%	14.31%	26.20%	27.02%	26.50%	#DIV/0!	
PERCENTAGE EXP/OBLG						100%		
DSLWK OPERATIONS	\$ 655,705.77	\$ 548,798.12	\$ 1,263.99	\$ 550,062.11	\$ 76,651.87	\$ 626,713.98	\$ -	\$ 28,991.80
DSLWK PARTICIPANT	\$ 437,137.18	\$ 25,488.48	\$ 103.69	\$ 25,592.17	\$ 20,237.66	\$ 45,829.83	\$ -	\$ 391,307.35
DSLWK TOTAL	\$ 1,092,842.95	\$ 574,286.60	\$ 1,367.68	\$ 575,654.28	\$ 96,889.53	\$ 672,543.81	\$ -	\$ 420,299.15
PERCENTAGE PARTICIPANT	40.00%	4.44%	7.58%	4.45%	20.89%	6.81%	#DIV/0!	93.10%
PERCENTAGE EXP/OBLG						62%		
YOUTH OPERATIONS	\$ 641,785.22	\$ 526,466.19	\$ 16,671.72	\$ 543,137.91	\$ 155,323.42	\$ 698,461.33	\$ -	\$ (56,676.11)
YOUTH PARTICIPANT	\$ 641,785.22	\$ 287,142.58	\$ 16,139.15	\$ 303,281.73	\$ 126,213.69	\$ 429,495.42	\$ -	\$ 212,289.80
YOUTH TOTAL	\$ 1,283,570.44	\$ 813,608.77	\$ 32,810.87	\$ 846,419.64	\$ 281,537.11	\$ 1,127,956.75	\$ -	\$ 155,613.69
PERCENTAGE PARTICIPANT	50.00%	35.29%	49.19%	35.83%	44.83%	38.08%	#DIV/0!	136.42%
PERCENTAGE EXP/OBLG						88%		

FORMULA PERCENTAGES				\$ 2,445,409.44				\$ 698,506.79
				\$ 212,914.89				\$ 122,593.95
TOTAL FORMULA OPERATIONS	\$ 2,072,172.01	\$ 1,635,316.54	\$ 55,989.88	\$ 1,691,306.42	\$ 582,820.10	\$ 2,274,126.52	\$ -	\$ (201,954.51)
TOTAL FORMULA PARTICIPANT	\$ 1,595,376.42	\$ 518,590.27	\$ 22,597.86	\$ 541,188.13	\$ 276,320.94	\$ 817,509.07	\$ -	\$ 777,867.35
TOTAL ALL FORMULA	\$ 3,667,548.43	\$ 2,153,906.81	\$ 78,587.74	\$ 2,232,494.55	\$ 859,141.04	\$ 3,091,635.59	\$ -	\$ 575,912.84
PERCENTAGE PARTICIPANT	43.50%	24.08%	28.75%	24.24%	32.16%	26.44%	#DIV/0!	135.07%
PERCENTAGE EXPENDED /OBL				60.87%		84.30%	0.00%	
YOUTH OUT OF SCHOOL	\$ 1,184,325.01	\$ 720,836.62	\$ 26,337.59	\$ 747,174.21	\$ 167,252.45	\$ 914,426.66		\$ 269,898.35
PERCENTAGE OUT SCHOOL	92.27%	88.60%	80.27%	88.27%	59.41%	81.07%		
YOUTH WORK EXPERIENCE	\$ 256,714.09	\$ 331,782.05	\$ 22,202.74	\$ 353,984.79	\$ 87,290.32	\$ 441,275.11		\$ (184,561.03)
PERCENTAGE WORK EXP	20.00%	40.78%	67.67%	41.82%	31.00%	39.12%		
OTHER FUNDS								
CARES Funding	\$ 413,250.00	\$ 124,448.60	\$ 242,745.61	\$ 367,194.21	\$ 19,819.30	\$ 387,013.51	\$ -	\$ 26,236.49
National DW Grant	\$ 764,609.32	\$ 69,760.07	\$ 18,021.83	\$ 87,781.90	\$ 397,931.00	\$ 485,712.90		\$ 278,896.42
STATEWIDE / NATA	\$ 533,952.36	\$ 225,192.07	\$ 4,011.03	\$ 229,203.10	\$ 126,521.10	\$ 355,724.20	\$ 20,434.81	\$ 157,793.35
RESEA	\$ 232,165.00	\$ 203,168.92	\$ 10,628.04	\$ 213,796.96	\$ 18,368.04	\$ 232,165.00	\$ -	\$ -
TOTAL OTHER FUNDS	\$ 2,355,251.68	\$ 799,904.50	\$ 290,013.18	\$ 1,089,917.68	\$ 749,822.33	\$ 1,839,740.01	\$ 20,434.81	\$ 495,076.86
TOTAL PROG FORMULA/OTHER	\$ 6,022,800.11	\$ 2,953,811.31	\$ 368,600.92	\$ 3,322,412.23	\$ 1,608,963.37	\$ 4,931,375.60	\$ 20,434.81	\$ 1,070,989.70
ADMINISTRATION	\$ 574,125.94	\$ 298,722.65	\$ 546.10	\$ 299,268.75	\$ 4,073.06	\$ 303,341.81	\$ -	\$ 270,784.13
TOTAL ALL FUNDS	\$ 6,596,926.05	\$ 3,252,533.96	\$ 369,147.02	\$ 3,621,680.98	\$ 1,613,036.43	\$ 5,234,717.41	\$ 20,434.81	\$ 1,341,773.83
	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (0.00)
PARTICIPANT % ALL FUNDS								
TOTAL FORMULA OPERATIONS	\$ 2,072,172.01	\$ 1,635,316.54	\$ 55,989.88	\$ 1,691,306.42	\$ 582,820.10	\$ 2,274,126.52	\$ -	\$ (201,954.51)
TOTAL FORMULA PARTICIPANT	\$ 1,595,376.42	\$ 518,590.27	\$ 22,597.86	\$ 541,188.13	\$ 276,320.94	\$ 817,509.07	\$ -	\$ 777,867.35
CONS. BUSINESS-IWT	\$ 123,273.95	\$ 28,257.56	\$ 6,586.02	\$ 34,843.58		\$ 34,843.58		
CONS. BUSINESS-OJT / RA	\$ 73,177.93	\$ 14,831.92	\$ 8,454.81	\$ 23,286.73	\$ 397,931.00	\$ 421,217.73	\$ -	\$ 278,896.42
STATEWIDE / NATA	\$ 533,952.36	\$ 225,192.07	\$ 4,011.03	\$ 229,203.10	\$ 126,521.10	\$ 355,724.20	\$ 20,434.81	\$ 157,793.35
TOTAL FORMULA-CB-RR-RAMP	\$ 4,809,227.67	\$ 2,599,523.20	\$ 112,246.27	\$ 2,711,769.47	\$ 1,570,776.03	\$ 4,282,545.50	\$ 20,434.81	\$ 1,044,753.21
TOTAL PARTICIPANT- CB - RR	\$ 2,613,781.71	\$ 935,949.10	\$ 49,670.37	\$ 985,619.47	\$ 987,955.93	\$ 1,973,575.40	\$ 20,434.81	\$ 1,246,707.72
PERCENTAGE PARTICIPANT	54%	36%	44%	36%	63%	46%	100%	119%

\*Prior Year Expenditures / Accruals Not Excluded

MINIMUM PARTICIPANT COST RATE	
Total YTD Participant Expenditures	\$ 478,017.29
Total YTD Program Expenditures	\$ 1,106,784.62
YTD MPCR	43.19%

**Northwest PY 2020 Budget - Revised Oct. 2020**  
**vs. YTD Expenditures as of 12/31/20**

	Budget	July - Sept. 2020	Percentage of Budget	Oct. - Dec. 2020	Percentage of Budget	PY 20 YTD Total	Percentage of Budget
<b>Participant Budget (34% prg)*</b>	<b>\$ 707,159.52</b>	<b>\$ 100,609.21</b>	<b>14%</b>	<b>\$ 133,633.67</b>	<b>19%</b>	<b>\$ 234,242.88</b>	<b>33%</b>
<i>*Formula funds only</i>						<b>Participant YTD = 27.22%</b>	
<b>Operating Budget (66% prg)</b>	<b>\$ 1,522,993.73</b>	<b>\$ 380,748.43</b>	<b>25%</b>	<b>\$ 380,748.43</b>	<b>25%</b>	<b>\$ 1,522,993.73</b>	<b>100%</b>
IFA Expenses (including OSO)	\$ 164,244.14	\$ 24,250.30	15%	\$ 31,861.61	19%	\$ 56,111.91	34%
Career Service Provider	\$ 806,282.00	\$ 197,001.02	24%	\$ 173,451.52	22%	\$ 370,452.54	46%
Board / Fiscal Agent Expenses	\$ 807,874.26	\$ 119,715.22	15%	\$ 80,087.16	10%	\$ 199,802.38	25%
<b>Total Operating Expenses</b>	<b>\$ 1,778,400.40</b>	<b>\$ 340,966.54</b>	<b>19%</b>	<b>\$ 285,400.29</b>	<b>16%</b>	<b>\$ 626,366.83</b>	<b>35%</b>
<i>Remaining Balance</i>	<i>\$ (255,406.67)</i>	<i>\$ 39,781.89</i>	<i>6%</i>	<i>\$ 95,348.14</i>	<i>9%</i>	<i>\$ 1,152,033.57</i>	<i>76%</i>
						<b>Operations YTD = 72.78%</b>	
<b>RESEA Program Operating Budget</b>	<b>\$ 83,555.96</b>	<b>\$ 29,159.97</b>	<b>35%</b>	<b>\$ 34,898.59</b>	<b>42%</b>	<b>\$ 64,058.56</b>	<b>77%</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>\$ 74,249.27</b>	<b>30%</b>	<b>\$ 135,177.67</b>	<b>55%</b>
<b>Adult &amp; DW Part. &amp; Program</b>	<b>\$ 1,460,653.26</b>	<b>\$ 282,585.14</b>	<b>19%</b>	<b>\$ 250,546.93</b>	<b>17%</b>	<b>\$ 533,132.07</b>	<b>36%</b>
<b>Youth Part. &amp; Program</b>	<b>\$ 776,953.28</b>	<b>\$ 158,990.61</b>	<b>20%</b>	<b>\$ 168,487.03</b>	<b>22%</b>	<b>\$ 327,477.64</b>	<b>42%</b>
<b>Total Part. &amp; Program</b>	<b>\$ 2,237,606.54</b>	<b>\$ 441,575.75</b>	<b>20%</b>	<b>\$ 419,033.96</b>	<b>19%</b>	<b>\$ 860,609.71</b>	<b>38%</b>
<i>Remaining Balance</i>	<i>\$ -</i>	<i>\$ 1,796,030.79</i>	<i>80%</i>	<i>\$ 1,376,996.83</i>	<i>62%</i>	<i>\$ 1,376,996.83</i>	<i>62%</i>
<b>Adult &amp; DW Program Only</b>	<b>\$ 1,104,360.33</b>	<b>\$ 232,135.60</b>	<b>21%</b>	<b>\$ 194,894.98</b>	<b>18%</b>	<b>\$ 427,030.58</b>	<b>39%</b>
<b>Youth Program Only</b>	<b>\$ 426,086.69</b>	<b>\$ 108,830.94</b>	<b>26%</b>	<b>\$ 90,505.31</b>	<b>21%</b>	<b>\$ 199,336.25</b>	<b>47%</b>
<b>Total Program</b>	<b>\$ 1,530,447.02</b>	<b>\$ 340,966.54</b>	<b>22%</b>	<b>\$ 285,400.29</b>	<b>19%</b>	<b>\$ 626,366.83</b>	<b>41%</b>
<i>Remaining Balance</i>	<i>\$ -</i>	<i>\$ 1,189,480.48</i>	<i>78%</i>	<i>\$ 904,080.19</i>	<i>59%</i>	<i>\$ 904,080.19</i>	<i>59%</i>

## Monitoring and Oversight

**Effective Date:** February 23, 2021 ~~October 30, 2019~~

**Duration:** Indefinite

**Purpose:** To establish a policy for the conduct of monitoring of sub-recipients and the engagement of the local board in monitoring and oversight activities

**Policy:** Monitoring is a joint responsibility of Compliance staff and each of the administrative-level staff who are responsible for performing desktop review and monitoring of their respective area and reporting deficiencies to the appropriate Director. Fiscal and Compliance staff monitor all fiscal aspects of the programs. The Northwest Tennessee Workforce Board (NWTNWB Staff) and Tennessee Department of Labor and Workforce Development (TDLWD) staff, or their agents, monitor subcontractors and in-house operations. The State Comptroller's Office may also conduct an audit.

The Northwest Tennessee Workforce Board will conduct monitoring and oversight of its' contractors and sub-recipients in receipt of WIOA funds. A pre-award financial review and / or on-site post-award monitoring of recipients that have little or no workforce program experience will be conducted no later than one hundred twenty (120) days after the award of a contract. All activities conducted and records maintained will be subject to monitoring and evaluation, including from both a fiscal, including procurement, and programmatic aspect. The NWTNWB Director of Performance and Compliance shall be responsible for overseeing the monitoring of each program activity and for ensuring corrective actions are taken when problems are found.

Programmatic, fiscal, and procurement monitoring may be completed through desktop review, on-site review, including reviews of policies, plans, and procedures governing all segments of program activities and program operations at least once during the program year, or a combination of the two processes. The review may include examining program records, questioning employees, interviewing participants, policy reviews, and entering any site or premise which receives WIOA funds. Participant files may be reviewed through random sampling. Monitoring will also determine compliance with the general procurement standards outlined in 2 CFR 200.318: "The non-Federal entity must use its own documented procurement procedures which reflect applicable State and local laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this section." The monitoring review is designed to help reduce possible audit exceptions, sanctions and unallowable costs. Monitoring at the Northwest TN Workforce Board, State, and Federal level will include a sample review of the Service Provider(s) and One-Stop Operator monitoring, oversight and quality control of participant training and corresponding employer payroll records, as well, as a sample review of how work-based activities align with and are facilitating the progress of career pathway strategies outlined in the local plan.

### Monitoring and Oversight Functions by Staff

**Compliance Coordinator** - Responsible for developing and maintaining a schedule that will ensure one or more monitoring reviews per year of all aspects of the WIOA program. Write systematic procedures for monitoring of all service components for compliance with WIOA regulations and policies. Monitor all adult, dislocated worker, and youth training activities to assure compliance with local, state, and federal WIOA guidelines. Perform a fiscal review of source documents of contractors and/or vendors to assure compliance. Produce written report (s) of all monitoring findings on contractor and/or vendors to the Director of Performance and Compliance, Executive Director and Contractor and the NWTNWB. Work with appropriate staff/contractors to remedy any findings. Conduct follow-up visit to affirm corrective

action is taken in a timely manner. Monitor participant eligibility information and training documents. Performance related issues including monitoring for proper documentation, appropriate dates, allowable activities, etc. Serve as a contact for state monitors and auditors during their monitoring activities in NWTNWB. Provide input to and participate in the review/evaluation process for Requests for Proposal process.

**Fiscal Staff** – Responsible for desktop review of subcontracts, invoices, support service contracts and reimbursements on a monthly basis, as well as grant budget and expenditure rates.

**Director of Performance and Compliance** - Provide policy and direction to Career Service Provider, Business Services **staff Coordinators**, Compliance **Coordinators**, and subcontractors regarding eligibility and record keeping. Responsible for reviewing program objectives and preparing participant status reports on a monthly basis.

**EO Officer** - Responsible for on-site review of facilities to assure compliance with state and federal regulations.

### Monitoring and Oversight by Function

**PROCUREMENT** – Procurement of goods and services are monitored on an ongoing basis by the Northwest Tennessee Workforce Board Staff. Staff prepare requisitions for purchase and secure approval of the Director of Finance & Administrative Services and/or Executive Director or his/her designee. The Financial Coordinator reviews purchases prior to approval by the Director of Finance

**FISCAL** – Budgets and expenditures of all grants are monitored on a monthly basis by the Director of Finance and reported to the Executive Director and reported quarterly to the Northwest Tennessee Workforce Executive Committee. Monthly reports are prepared based on the organization's accounting system and approved prior to submission to the TDLWD. A review of expenditure and budget levels is made on a periodic basis dependent upon the particular grant.

Every subcontract must be fiscally monitored during the contract period. The Compliance Coordinator will keep a file for each individual contract and keep the monitoring report updated. The fiscal monitoring process is as follows:

- One Stop Operator and Career Service Providers contract invoices are reviewed monthly.
- For On the Job Training and Incumbent Worker Training Contracts, if the contract allows for contractors to bill at the end of the participant's training, the invoice is monitored once received for payment. A minimum of one invoice must be monitored per contract.
- Back-up documentation supporting the invoice must be included. Back-up documentation is defined as supporting documents for amounts on the invoice.

**PROGRAM OBJECTIVES** – Program Objectives are monitored on a monthly basis. The Executive Director and Director of Performance and Compliance review internal reports submitted by the Career Service Provider and One Stop Operator Staff and/or contractor and prepares summary reports to be reviewed by the Northwest Tennessee Workforce Board.

**GRIEVANCE PROCEDURES** – Monitoring includes a review of a sample of participant files to assure that the participant has acknowledged receipt of a registrant handbook and grievance procedures.

**RECORD KEEPING** – All contracts, participant and fiscal records are to be maintained for a minimum of five years, unless subject to audit which are kept until the audit is concluded.

**EQUAL EMPLOYMENT OPPORTUNITY** – On-site visits to subcontractors and in-house operations include an interview with participants regarding their knowledge of Equal Employment Opportunity and a viewing of appropriate equal opportunity posters.

**AMERICANS WITH DISABILITIES ACT** – On-site visits to subcontractors and in-house operations include discussions with subcontractors and a review of the property.

### On-Site Program Evaluation

The purpose of the on-site evaluation process is for the Compliance Coordinator to observe each program, to see how the program is being implemented, meet and interview some of the participants to assess their satisfaction/success with the program and to observe that funds are being spent according to the contract. There are specific monitoring questions to be utilized during the on-site review according to the program. The current contracts that require on-site evaluation (subject to change) are On-the-Job Training contracts and may include the One Stop Operator and Career Service Provider. **Site reviews may be conducted virtually as needed.**

### One-Stop Operator Monitoring & Oversight

The Northwest TN Workforce Board will monitor the activities of the One-Stop Operator at least once annually during the contract period, no less than sixty (60) days prior to the expiration date of the contract. The monitoring process will determine compliance with the contractual agreement, federal, state and NWTNWB policies.

Additionally, all invoices will be monitored prior to payment, including review of source documents supporting payments. In the event of inappropriate or undocumented requests for reimbursement, the Authorized Signatory Authority will be notified and given an opportunity to provide additional documentation and/or explanation. The Director of Performance and Compliance will consult with the **Director of Finance & Administrative Services Chief Operating Officer** regarding any final adjustments to the invoice.

Upon completion of a monitoring, the Performance and Compliance staff will develop a formal, written, monitoring report, detailing the results of the monitoring, including any necessary corrective action. The report is forwarded to the Executive Director for review prior to issuing the final report to the One-Stop Operator Signatory Authority. The final report will be issued within thirty (30) days of the completion of the review. Continued monitoring will occur if the Correction Action Plan is deemed inadequate. Results of the monitoring will be reported to the Executive Committee of the NWTNWB, who will then report results to the full NWTNWB, which includes the Consortium of Local Elected Officials as ex-officio members.

### Service Provider(s) Monitoring & Oversight

The Northwest TN Workforce Board will monitor the activities of the Service Provider(s) at least once annually during the contract period, no less than sixty (60) days prior to the expiration date of the contract. The monitoring process will determine compliance with contractual agreements, federal, state and NWTNWB policies.

In addition, a minimum of a 20% sample of the newly enrolled participants will be monitored on an on-going basis for eligibility and other compliance factors, including but not limited to, providing appropriate service strategies, proper documentation, accurate recording of data, and timely case notes. The NWTNWB will utilize the TDLWD Program Accountability Review form, Data Validation

guidelines, policies of the Board, policies of the TN Department of Labor and Workforce Development, the WIOA, federal regulations and guidance, and other relevant information as the basis of the review of the following areas:

- Date of WIOA Application in Jobs4TN
- Eligibility Date in Jobs4TN
- Contact Information (Social Security Number, Address, Phone Numbers)
- Demographic Information (DOB, Gender, US Citizenship, Selective Service if applicable, Race, Disability)
- Veteran Information
- Employment Information
- Education Information
- Public Assistance Information
- Barriers
- Household and Income
- Federal Initiatives
- Eligibility Summary
- Eligibility correctly entered in Jobs4TN with supporting documentation in the electronic file verifying how they were made eligible. The income table for Adult/DW/Youth should be attached to support the time-period of eligibility if making eligible based on income.
- If the participant was made eligible as a youth (family of one) based on a disability, supporting documentation showing proof of the disability must be in the file.
- Data has been keyed and documents uploaded to VOS within 10 days.
- Assessment used and uploaded to documents in VOS
- Objective Assessment keyed for Youth – Dates should match activities keyed in VOS
- Individual Employment Plan/Service Strategy (goals to be in line with the participants plan) – Dates should match activities keyed in VOS
- Appropriate Activities keyed in VOS with documentation to back up dates: for Youth – 14 Elements reflected accordingly
- Case Notes are required monthly and should be detail oriented and clearly explain what is actively occurring with the participant. It is crucial that staff is obtaining direct contact with the participant or school/institution to determine their current progress in school.
- EO statement/Grievance complaint procedure.
- Proof of other grant coordination in the file (SAR showing they are getting pell, lottery, etc. The EAS form can be used to show proof of the SAR).
- Review all ITAs and travel authorizations with back up documentation.

Identification of significant compliance issues may result in expansion of the sample. A sample of participant files identified to close/exit will be reviewed for compliance with closure/exit data and documentation. Further, all invoices will be monitored prior to payment, including review of source documents supporting payments. In the event of inappropriate or undocumented requests for reimbursement, the Authorized Signatory Authority will be notified and given an opportunity to provide additional documentation/explanation. The Director of Performance and Compliance will consult with the Director of Finance & Administrative Services regarding any final adjustments to the invoice.

Upon completion of a monitoring, the Performance and Compliance staff will develop a formal, written, monitoring report, detailing the results of the monitoring, including any necessary corrective action. The report is forwarded to the Executive Director for review prior to issuing the final report to the



Service Provider Signatory Authority. The final report will be issued within thirty (30) days of the completion of the review. Continued monitoring will occur if the Correction Action Plan is deemed inadequate. Results of the monitoring will be reported to the Executive Committee of the NWTNWB, who will then report results to the full NWTNWB, which includes the Consortium of Local Elected Officials as ex-officio members.

#### *Data Validation*

In accordance with TDLWD policy, each local workforce development board (LWDB) will also be responsible to conduct quarterly data validation review of each program for which they are a sub-recipient of program funds. The results of the data validation must be submitted quarterly to the State Workforce Development Board (SWDB) along with LWDB's quarterly monitoring report. The LWDB must conduct the number of data validation reviews based on the sample size established by the TDLWD Workforce Services (WFS) staff. Notification of sample size will be sent to the LWDBs through a 'Notice of Data Validation.' 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 report.

#### *Service Provider Monitoring (as Contracting Authority)*

It is the responsibility of the Service Provider to monitor (fiscal/programmatic and desktop/onsite) their subcontracts at least annually, as well as a sample of participant files. The Service Provider will submit a plan/schedule of monitoring to the Northwest TN Workforce Board. A copy of any completed monitoring reports will be due by the 10<sup>th</sup> of the month for the previous month.

The Service Provider is also responsible for monitoring a sample of all other participants (non-work-based training) for eligibility, service strategy, expenditures and data validation elements.

#### *One-Stop Operator Oversight*

It is the responsibility of the One-Stop Operator to provide quality control checks on services provided through the American Job Center on behalf of participants and employers. This may include a review of new enrollments to determine that appropriate services were provided and review of potential exits to determine if additional services are required. Additionally, the One-Stop Operator will conduct surveys with individual and employer customers of the American Job Center.

#### *Other Subcontractor(s) Monitoring*

It is the responsibility of the Director of Performance & Compliance to monitor (fiscal/programmatic and desktop/onsite) other subcontracts at least annually. Contracts for Work-Based Training must be monitored at least once by the contracting authority. Monitoring will be based on the contract agreement and may be performed by the contract manager or another position. If the Work-Based Training is for reimbursement of wages, the employer must submit the following for review:

- Invoice form;
- Payroll records showing the gross wages paid to the trainee;
- Time records showing actual hours worked;

Onsite monitoring visits should be conducted shortly after the trainee begins work, and include additional visits at appropriate intervals (determined by the length of the training plan). Effective monitoring also includes desk review of correspondence from the employer, including payment invoices and required documentation to support those invoices.

Monitoring must also include regular review of each trainee's progress in meeting program and service strategy objectives. Such strategies should include the trainee's acquisition of basic/occupational skills and the adequacy of supportive services provided as related to work-based training. Any deviation from the work-based training contract should be dealt with and documented promptly. A sample of participant files engaged in work-based training should be monitored for eligibility, service strategy, expenditures, and data validation elements.

### Additional Monitoring

The NWTNWB Board and its 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 subcontractor. If additional monitoring is conducted, the subcontractor will be notified in writing to identify the reason and timeline to be established.

### Monitoring Reports & Resolution Process

Written monitoring reports are comprised of five basic areas:

1. Scope of Contract
2. Timeliness of Invoice Submission
3. Adequacy of Documentation
4. Proper Completion of Invoice
5. Compliance within Budget Limits

A finding in a monitoring report is any specific violation of program authorization/statute, other applicable Federal, State, or local statutes, policies, or procedures, applicable appropriations, implementing regulations, Executive Orders, OMB Circulars (including 2 CFR part 200 & 2 CFR part 2900), DOL-ETA Directives, or terms and conditions of the award. Findings always require action to correct the violation and documentation of non-compliance is required. Observations or areas of concerns are not specific compliance violations but may have negatively impacted program or could lead to a finding in the future. They may include activities related to effectiveness objectives or indicators that have not been met and could possibly result in a finding at some later point if not addressed. Typically, no corrective action is specified but suggestion for improvement may be made.

Additionally, if necessary, reports will include instructions to the subcontractor for:

1. Developing a Corrective Action Plan, such as instruction on how, where, and when to submit a corrective action plan. Corrective action plans must typically be received within 30 business days of the issued monitoring report unless otherwise stated.
2. Addressing Questioned Costs such as providing missing documentation, making repayments, or transferring costs to another source.

NWTNWB Compliance staff will track issues until the corrective action is completed and may verify on-site if appropriate. If action is not completed within the required timeframe, additional actions may be taken if needed and may include:

1. Temporarily withhold cash payments;
2. Disallow all or part of the cost of the activity or action not in compliance;
3. Wholly or partly suspend or terminate the award; or
4. Take other remedies that may be legally available.

### Submission of Quarterly Monitoring Reports

Each LWDB must submit a quarterly report that outlines the results of their monitoring to WFS staff by the designated deadline in the format prescribed by WFS. The submitted reports will be reviewed to ensure compliance, track progress, identify concerns, and locate best practices. A report for each LWDB and planning region will be compiled and WFS staff will address concerns or offer technical assistance as needed.

### Appeals Process

In the event of a disagreement resulting from the monitoring process, the contractor and / or sub-recipient may choose to file an appeal. A disagreement is considered to have reached the level of an appeal when an issue arises that is not easily coming to a point of resolution. It is the responsibility of the LWDB Chair (or designee) to coordinate the dispute resolution to ensure that issues are being resolved appropriately through the appeal process:

- (1) Any disputes shall first be attempted to be resolved informally.
- (2) Should informal resolution efforts fail, the appeal process must be formally initiated by the petitioner seeking resolution. The petitioner must send a notification to the LWDB Chair (or designee) regarding the conflict within 10 business days.
- (3) The LWDB Chair (or designee) shall place the dispute on the agenda of a special meeting of the LWDB's Executive Committee. The Executive Committee shall attempt to mediate and resolve the dispute. Disputes shall be resolved by a 2/3 majority consent of the Executive Committee members present.
- (4) The decision of the Executive Committee shall be final and binding unless such a decision is in contradiction of applicable State and Federal laws or regulations governing the contractor and / or sub-recipient agencies.
- (5) The right of appeal no longer exists when a decision is final. Additionally, final decisions will not be precedent-setting or binding on future conflict resolutions unless they are officially stated in this procedure.
- (6) The Executive Committee must provide a written response and dated summary of the proposed resolution to all parties.
- (7) The LWDB Chair (or designee) will contact the petitioner and the appropriate parties to verify that all are in agreement with the proposed resolution.

**Reference:** 2 CFR 200.331

**Related TDLWD Policy:** Monitoring ~~Guide~~

**Vetted and Approved by the Northwest Tennessee Workforce Board:** February 23, 2021 ~~October 30, 2019~~

---

Jimmy Williamson, Chair ~~Jennifer Bane, Executive Director~~  
Northwest Tennessee Workforce Board

## Grievance and Complaint Resolution

**Effective Date:** February 23, 2021 ~~May 22, 2018~~

**Duration:** Indefinite

**Purpose:** To establish a complaint and grievance policy for participants and other interested parties to address alleged violations of the requirements of Title I of the WIOA.

**Policy:** The Northwest Tennessee Workforce Board Grievance and Complaint resolution is as follows:

### Non-Discriminatory Complaints

This complaint procedure is limited to complaints and/or grievances that are non-discriminatory in nature, ~~such as 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 Local Workforce Development Area (LWDA) against either other staff or against a sub-recipient entity.~~ This procedure applies to ~~staff~~, program participants, applicants, service/training providers, and other interested parties. In cases where discrimination is alleged, a different process is used, and the LWDA's Equal Opportunity Officer handles the complaint. ~~Complaints made by LWDA staff against other LWDA staff or a sub-recipient entity may also follow the Employee complaints will be addressed through~~ procedures prescribed by the Employer of Record for Staff to the Board, Partners and Providers. One-on-one assistance is available for individuals with disabilities when necessary.

~~Informal procedures and a hearing will be initiated to resolve the applicant/participant's complaint within 60 days. If these procedures do not resolve the issue to the applicant/partisan's satisfaction, the Executive Director will advise the individual of the formal complaint procedure as follows:~~

- 1) All complaints must be submitted in writing to the Executive Director at the Northwest Tennessee Workforce Board in the form of a letter via certified U.S. Mail to: Executive Director, ~~208 N. Mill Ave. 708 E. Court St.,~~ Dyersburg, TN 38024.
- 2) All complaints must include:
  - Name and address of complainant;
  - A description of the allegations, including any supporting documentation;
  - Settlement or corrective action desired by complainant;
  - If there are any witnesses, their names are included; and
  - Date of the incident (or time frame, if there is an occurrence over a period of time), and date of filing;
  - Describe attempts to resolve the issue of complaint;
  - Complaints must be submitted within 180 days of the date of the incident.
- 3) The Executive Director will provide written acknowledgement of receipt of complaint to complainant.
- 4) The Executive Director will launch an investigation.
- 5) The Executive Director will hold a formal verbal discussion with complainant within fifteen (15) working days of receipt of complaint.
- 6) The Executive Director will communicate a written decision to the complainant within ten (10) working days of the verbal discussion.
- 7) Should the complainant not be satisfied, the complainant may file a written appeal, prepared consistent with item #2 above, with the Board Chairman.
- 8) Upon receipt of an appeal, the Chairman will convene an ad hoc committee to review the appeal. The hearing will be limited to the original complaint and the complainant can choose to be represented by another individual, including legal counsel.

- 9) The committee will render a written decision to the complainant within five (5) working days of the hearing. If more time is required to reach a decision, the complainant will be notified in writing of the time by which a decision will be made.
- 10) For issues covered under this procedure, the decision of this committee may be appealed to the Tennessee Department of Labor and Workforce Development (TDLWD). If a decision has not been made within sixty (60) days, an appeal may also be made to the TDLWD.
- 11) Copies of all appeals will be forwarded to ~~the Employment and Training Administrator at~~ the Tennessee Department of Labor and Workforce Development.
- 12) All files pertaining to complaints will be maintained not less than five (5) years, and will be available to all federal and state monitors.
- 13) An individual party to a collective bargaining agreement, alleging a labor standards violation, may also submit the grievance to a binding-arbitration procedure.

The Executive Director must maintain documentation throughout the complaint process which must include, at a minimum, the Employment and Training Administration (ETA) Complaint/Apparent Violation Form, correspondence related to the complaint, and meeting minutes regarding any in-person adjudication between LWDA staff and the complainant, if applicable.

#### Hostile Work Environment Complaints, Unrelated to American Job Center Staff

The One-Stop Operator (OSO) 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: inspections of child-labor and non-smoker protection, claims for unpaid wages, and investigations of 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/regulationscompliance/regulations---compliance-redirect/labor-standards-unit.html>

- B. Complaints to TOSHA: inspections of 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-safetycomplaint.html>

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

#### Discriminatory Complaints

The Workforce Innovation and Opportunity Act must comply with Title VI and VII of Civil Rights Act of 1964, Title IX of the Education Amendment of 1972, section 504 of the Rehabilitation Act of 1973, Executive Order 11, 246 and the related regulations to each. The Northwest Tennessee Workforce Board (NWTNWB) assures that it will not discriminate against any individual because of race, religion, creed, color, sex, age, disability, national origin, political affiliation, or belief. Additionally:

- It is against the law for the NWTNWB, a recipient of Federal financial assistance, to discriminate on the following basis;
- Against any individual in the United States, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief; and

- Against any beneficiary of programs financially assisted under Title I of the Workforce Innovation and Opportunity Act (WIOA) on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his/her participation in any WIOA Title I - financially assisted program or activity.

The NWTNWB must not discriminate in any of the following areas:

- Deciding who will be admitted, or have access, to any WIOA Title I financially assisted program or activity;
- Providing opportunities in, or treating any person with regard to, such a program or activity; or
- Making employment decisions in the administration of, or in connection with such a program or activity.

Further, the NWTNWB agrees to take affirmative action to ensure that applicants are employed and the employees are treated equally during their employment without regard to race, religion, creed, color, sex, disability, or national origin and that such action shall include, but not be limited to the following: employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection available to employees and applicants for employment.

Applicants/participants, or other interested parties, who feel that they have received unequal treatment should contact the Northwest Tennessee Workforce Board, Equal Opportunity Officer, 731-286-3585, TDD ~~7-1-1 731-286-8383~~. Informal procedures **and a hearing** will be initiated to resolve the applicant/participant's complaint **within 60 days**. One-on-one assistance is available for individuals with disabilities when necessary. If these procedures do not resolve the issue to the applicant/partisan's satisfaction, the Equal Opportunity Officer will advise the applicant/participant of the formal complaint procedure as follows:

If an individual thinks he / she has been subjected to discrimination under WIOA Title I – financially assisted program or activity, the individual may file a complaint within 180 days from the date of the alleged violation with either:

**U.S. Department of Labor**  
Director, Civil Rights Center  
U.S. Department of Labor  
200 Constitution Avenue NW, Room N-4123  
Washington, D.C. 20210  
202-693-6500  
(TTY) 202-693-6516

**TN Dept. of Labor & Workforce Development**  
Equal Opportunity Officer  
220 French Landing Drive  
Nashville, TN 37243  
615-253-1331  
(TDD) 615-532-2879

**Northwest TN Workforce Board**  
Equal Opportunity Officer  
~~208 N. Mill Ave. 708 E. Court Street~~  
Dyersburg, TN 38024  
731-286-3585  
(TDD) ~~7-1-1 731-286-8383~~

To file a complaint with the NWTNWB Equal Opportunity Officer (EOO), all complaints must be submitted in writing to the EOO at the Northwest Tennessee Workforce Board in the form of a letter via certified U.S. Mail to: EOO, ~~208 N. Mill Ave. 708 E. Court St.~~, Dyersburg, TN 38024.

1) All complaints must include:

- Name and address of complainant;
- A description of the allegations, including any supporting documentation;
- Settlement or corrective action desired by complainant;
- If there are any witnesses, their names are included; and
- Date of the incident (or time frame, if there is an occurrence over a period of time), and date of filing;
- Describe attempts to resolve the issue of complaint;
- Complaints must be submitted within 180 days of the date of the incident.

2) The EOO will provide written acknowledgement of receipt of complaint to complainant.

3) The EOO will launch an investigation.

4) The EOO will hold a formal verbal discussion with complainant within fifteen (15) working days of receipt of complaint.

- 5) The EOO will communicate a written decision to the complainant within ten (10) working days of the verbal discussion.
- 6) For issues covered under this procedure, the decision may be appealed to the Tennessee Department of Labor and Workforce Development (TDLWD). If a decision has not been made within sixty (60) days, an appeal may also be made to the TDLWD.

The EOO must maintain documentation throughout the complaint process which must include, at a minimum, the Employment and Training Administration (ETA) Complaint/Apparent Violation Form, correspondence related to the complaint, and meeting minutes regarding any in-person adjudication between LWDA staff and the complainant, if applicable.

If a complaint is filed with the Northwest Tennessee Workforce Board, the individual must wait either until the Workforce Board issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center (see address above).

If the NWTNWB does not give a written Notice of Final Actions within 90 days of the day on which the individual filed a complaint, the individual does not have to wait for the Workforce Board to issue that Notice before filing a complaint with the CRC. However, the individual must file CRC complaint within 30 days of the 90-day deadline.

If the NWTNWB does give written Notice of Final Action for the complaint, but the individual is dissatisfied with the decision or resolution, a complaint may be filed with CRC. An individual must file a CRC complaint within 30 days of the date on which he / she received the Notice of Final Action.

The NWTNWB is an Equal Opportunity Employer/Program; Auxiliary Aides are services are available upon request to individuals with disabilities. An individual party to a collective bargaining agreement, alleging a labor standards violation, may also submit the grievance to a binding-arbitration procedure.

### Complaint Logs

A complaint log will be maintained for each American Job Center and submitted to the TDLWD in accordance with their policy. The log must 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.

### Reporting Fraud, Waste, and Abuse

Information and complaints involving criminal fraud, abuse, or other criminal activity must be reported immediately in one of the following three ways:

Atlanta Regional Office, Office of  
Investigations, U.S. Dept. of Labor  
61 Forsyth Street Southwest,  
Room 6T1  
Atlanta, GA 30303

Tennessee Comptroller of  
Treasury  
Fraud, Waste, and Abuse  
Hotline:  
1-800-232545.

Inspector General Office of  
Investigations, Room S5514  
U.S. Department of Labor  
200 Constitution Ave.  
Washington, DC 20210

**Reference:** 20 CFR 683.600(b)(1); 20 CFR 683.600(c); 29 CFR 38.1

**Related TDLWD Policy:** Grievance and Complaint Resolution Policy ~~(pages 3 and 7)~~

**Vetted and Approved by the Northwest Tennessee Workforce Board:** February 23, 2021 ~~May 22, 2018~~

---

Jimmy Williamson, Chair ~~Margaret Prater, Executive Director~~  
Northwest Tennessee Workforce Board



# PROPOSED KPI TARGETS- WEST TN

## Adult and Dislocated Worker New Enrollments

Area	Baseline*	%	1,542 Goal
NW	\$ 1,296,565.26	15.3%	236
SW	\$ 1,192,916.67	14.1%	217
GM	\$ 5,990,555.02	70.6%	1,089
<b>Total</b>	<b>\$ 8,480,036.95</b>	<b>100%</b>	<b>1,542</b>

\*PY20/FY21 Formula Funding Allocations for Adult and DW Programs

## Youth New Enrollments

Area	Baseline*	%	584 Goal
NW	\$ 698,842.95	15%	89
SW	\$ 642,358.13	14%	82
GM	\$ 3,248,907.24	71%	413
<b>Total</b>	<b>\$ 4,590,108.32</b>	<b>100%</b>	<b>584</b>

\*PY 20 Formula Funding Allocations for Youth Program

## Wagner Peyser New Enrollments

Area	Baseline*	%	4,687 Goal
NW	833	21%	989
SW	534	14%	634
GM	2,580	65%	3,064
<b>Total</b>	<b>3,947</b>	<b>100%</b>	<b>4,687</b>

\*PY20 Actual

## RESEA Co-Enrollments

Area	Baseline*	%	84 Goal
NW	n/a	33.4%	28
SW	n/a	33.3%	28
GM	n/a	33.3%	28
<b>Total</b>	<b>0</b>	<b>100%</b>	<b>84</b>

\*Goal split equally

## SNAP E&T New Enrollments

Area	Baseline*	%	814 Goal
NW	107	15%	124
SW	217	31%	249
GM	384	54%	441
<b>Total</b>	<b>708</b>	<b>100%</b>	<b>814</b>

\*PY20 Actual New Enrollments

## TAA Co-Enrollments

Area	100.0% Goal
NW	100.0%
SW	100.0%
GM	100.0%
<b>Total</b>	<b>100.0%</b>

## Jobs for Veterans State Grants New Enrollments

Area	Baseline*	%	73 Goal
------	-----------	---	---------



NW	1	17%	13
SW	18	23%	18
GM	28	60%	42
<b>Total</b>	<b>47</b>	<b>100%</b>	<b>73</b>

\*PY20 Actual Enrollments (+1 for SW & -1 for GM to not decrease SW below baseline)

#### Re-Entry New Enrollments (all partners)

Area	Baseline*	%	570 Goal
NW	93	18%	104
SW	111	22%	124
GM	308	60%	342
<b>Total</b>	<b>512</b>	<b>100%</b>	<b>570</b>

includes 14 Weakley County Schools

includes 81 Henderson Co. Schools & 9 JSCC

includes 104 HopeWorks

\* PY20 Re-Entry New Enrollments (Title I, AE, and WP)

#### SCSCEP (31 = state goal?)

Provider	Baseline*	%	Quarterly Goal
TNCSA	10	36%	2, 2, 3, 3
SW HRA	4	14%	1, 1, 1, 1
Meritan	14	50%	3, 4, 4, 3
<b>Total</b>	<b>28</b>	<b>100%</b>	<b>28</b>

\*SCSEP Providers Proposed Goals (per Formstack)

#### Adult Education

Provider	Baseline*	%	Quarterly Goal
Weakley Co. Schools	364	11%	70,
Jackson State	292	9%	69,
Henderson Co. Schools	442	14%	96,
Hopeworks	1,948	60%	290,
TCAT Ripley	84	3%	16,
TCAT Covington	120	4%	40,
<b>Total</b>	<b>3,250</b>	<b>100%</b>	<b>3,250</b>

NW

NW & SW (need to agree on quarterly breakdown submitted)

SW & GM (need to agree on quarterly breakdown submitted)

GM

GM

GM

\*Providers' contracted targets for PY 21

#### Integrated English Language & Civics Education

Area	Baseline*	%	328 Goal
NW			
SW			
GM	328	100%	1,
<b>Total</b>	<b>328</b>	<b>100%</b>	<b>328</b>

\*Provider's contracted targets for PY 21

# REVISED

## West TN & NW Proposed Targets for KPIs

Program	2020 West TN Goal	2020 NW Target	2020 NW Actual (estimated)	2021 West TN Goal	2021 NW Proposed Target	2021 NW Negotiated Target	Q1	Q2	Q3	Q4	% of Regional 2021 Goal	Difference
Adult and Dislocated Worker New Enrollments	1,877	380	382	1,542	236	296	51	65	110	70	19%	60
Youth New Enrollments	857	107	54	584	89	78	17	26	21	14	13%	-11
Wagner Peyser New Enrollments	9,410	2,007	868	4,687	989	989	272	205	239	273	21%	0
RESEA Co-Enrollments	170	15	1	84	28	33	4	9	11	9	39%	5
SNAP E&T New Enrollments	570	103	112	814	124	124	36	25	30	33	15%	0
TAA Co-Enrollments	50.0%	50.0%	25.8%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	n/a	0.0%
Jobs for Veterans State Grants New Enrollments	100	25	1	73	13	19	4	5	5	5	26%	6
Re-Entry New Enrollments (all partners)	707	309	97	416	104	104	22	30	30	22	25%	0
SCSEP - TNSCA (Unsubsidized Employment)	n/a	n/a	6	31	10	10	2	2	3	3	32%	0
Adult Ed. - Jackson State Community College	n/a	265	524	3,250	292	278	50	70	90	68	16%	-14
Adult Ed. - Weakley County Schools	n/a	333	481		361	248	44	62	80	62		-113
Integrated English Language / Civics Ed. (Memphis only)	n/a	n/a	0	328	0	0	0	0	0	0	0%	0

**West TN & NW Proposed Targets for KPIs**

<b>Program</b>	<b>2020 West TN Goal</b>	<b>2020 NW Target</b>	<b>2020 NW Actual</b>	<b>2021 West TN Goal</b>	<b>2021 NW Target</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>% of Regional 2021 Goal</b>
Adult and Dislocated Worker New Enrollments	1,877	380	367	1,542	236	42	53	90	51	15%
Youth New Enrollments	857	107	61	584	89	17	26	29	17	15%
Wagner Peyser New Enrollments	9,410	2,007	866	4,687	989	247	247	248	247	21%
RESEA Co-Enrollments	170	15	2	84	28	3	8	9	8	33%
SNAP E&T New Enrollments	570	103	112	814	124	31	31	31	31	15%
TAA Co-Enrollments	50.0%	50.0%	25.8%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	n/a
Jobs for Veterans State Grants New Enrollments	100	25	1	73	13	3	3	3	4	18%
Re-Entry New Enrollments (all partners)	707	309	97	570	104	22	30	30	22	18%
SCSEP -TNSCA (Unsubsidized Employment)	n/a	n/a	n/a	31	10	2	2	3	3	32%
Adult Ed. - Jackson State Community College	n/a	265	467	3,250	292	69	57	83	83	20%
Adult Ed. - Weakley County Schools	n/a	333	481		361	69	68	112	112	
Integrated English Language / Civics Ed. (Memphis only)	n/a	n/a	n/a		0	0	0	0	0	