

Northwest TN Workforce Board
Outreach and Opportunities Committee

Monday, July 27, 2020 – 1:00 p.m.

Join Zoom Meeting:

<https://us02web.zoom.us/j/89983435210?pwd=cTg3WUZnSGIUSHITTHV3MkFTWmYydz09>

Meeting ID: 899 8343 5210

Password: 734081

Chair – Ben Marks

Vice Chair – Glad Castellaw

Minutes

Committee members attending via webinar: Ben Marks, Landy Fuqua, Brad Hurley, Amy McDonald, Glad Castellaw, David Parrish, Justin Crice, Lindsay Frilling

Staff attending via webinar: Jennifer Bane, Lana Burchfiel, Ginger Powell, LeAnn Lundberg, Gina Johnson

Others attending via webinar: Erica Nance, Connie Stewart, Jennifer Eppley

Review and Approval of Minutes of April 27, 2020 Meeting: Glad Castellaw called the meeting to order and the group was asked for comments regarding the prior meeting's minutes.

- **MOTION:** Brad Hurley moved to approve the October 28, 2019 minutes and Justin Crice seconded the motion. All were in favor and the motion carried.

Consideration of Eligible Training Provider List Programs: The committee received attached handouts with the details of the program and the related labor market information.

- **TCAT Newbern Certified Production Technician (CPT) Program Renewal:** This is the Lake County jail program, but they are going to be rotate with the Obion County Jail. The state did pass a new policy that now requires all programs to report on an annual basis number of students served. We are waiting for additional guidance for placement. As the policy stands right now, the state is willing to allow this due to the small class size and the circumstances.
 - **MOTION:** Brad Hurley moved to approve CPT Program through TCAT Newbern and Amy McDonald seconded the motion. All were in favor and the motion carried.

Promising Practices/ Supplemental Grant Updates & New Opportunities

- **Apprenticeship Grants (TDLWD & DRA):** Ginger Powell presented the attached handouts regarding apprenticeship, offsetting salaries, and expanding apprenticeship. We are on track. This quarter was a little slower, but we did a lot of Zoom calls, etc. since we couldn't meet in person. We did submit a new apprenticeship this last Friday and one today. We are on track for extending. Our Amteck pre-apprenticeship did graduate with 5 guys, all of whom plan to stay on work experience until they can be hired with Amteck. We started with 9 and ended up with 5. It served its purpose to let participants see if this is right for them.
- **RESEA Grant:** Jennifer Bane presented the attached handout. They have been working to try to restart the program, but the numbers are behind. We hope to get closer to 10% getting referred.
- **National Dislocated Worker Grant (DWG):** This is a national grant. The state will get about 6 million. We had asked for about \$800,000, but so far we have gotten \$249,000. They are expanding the definition of dislocated workers due to the disaster relief. We are working with county mayors to see if they are interested in placing workers to clean/sanitize.

- Others (GIVE – Partnership with DSCC; DSCC Delta Healthcare Grant Partnership): We had hoped to have an event at beginning of May, but we will hopefully be able to reschedule it in some fashion in the Fall. We had applied for some funding for industry panels and soft skills training that can also be rescheduled for the Fall.

Special Populations Updates

- Target Populations Report: : Erica Nance presented the following attached report. We had for the month of June newly enrolled 133 and 24 youth, 2 veterans, 0 disabilities, 1 justice involved, 23 low income.
- Youth Services Connie Stewart/Ginger Powell: We held a 2nd informational event and there were several who showed up including one who drove from Chattanooga. Amy McDonald with TN Homeless Solutions was able to provide immediate housing since he was planning on camping the whole time, and hopefully he can be placed with Amteck soon. He was one of the 5 who did complete. Ginger said seeing this partnership work getting this young man housing was a huge benefit and an example of how partners can come together. None of them were 2020 graduates. The reason we ended up with someone from Chattanooga was due to the program being marketed on social media when we missed our opportunities to promote in the schools. Connie said the AJC in Chattanooga was great to work with. We just scanned all the paperwork to them and he went through the AJC there to sign all the paperwork. We haven't reached out to the high schools yet, but we are hoping to work with them to place some of their students in work experience.
 - Registered Electrical Apprenticeship Preparation: Described in item above.
 - Benton County WORKLife Program (Rural Initiative Funding): Connie said we were really hoping to get some more youth through this program, and Ginger's team did a great job putting this program together. We got about 19 youth from the event. All of them are doing really well. Some are placed at the humane society and some through the school system. We originally promoted this program to happen during school hours. We were very happy with the turnout since school was out and everything was closed during COVID. Considering the circumstances, Maleia Evans did everything she could to get the word out to employers and students, and we were happy with the placements. There were a couple of employers who were willing to take more, but every employer that came at least had one placement. The employers got to choose their choices of students, and students chose their employers, and we did the best we could do with matchmaking. Connie said that she met with Dr. Bowyer about placing youth on campus for a Covid-19 for screeners. We have put this job on Facebook, and have received over 50 applicants, but only a few who are eligible for age.
- Offenders; RAMP (Rural Initiative Funding): Ginger Powell: We haven't had a lot of changes since many of the classes have been on hold and not allowing visitors. They are trying to keep their population safe. 15 classes (excluded Carroll county since they haven't finished their first class). 149 students enrolled. We have a decent pass rate for safety, but it gets less as you go across due to a loss of students. We have quite a few exclusions. The only active classes we have are Carroll County, and Obion County set to start very first class on Monday, Aug. 3, starting with 9 students. Lake County completed since we last met. We struggled to get even 9 in that class, and we lost a lot of students from that class. When we lose them, it really hurts our performance, and we only had one student left to complete the class. The jail administrator worked so hard to make this a success, but there are a lot of variables out of their control.

Consideration of New / Revised Policies: (Handouts are attached)

- Training Provider Approval Policy Changes: Added section regarding monitoring and meeting the criteria.

- Youth Eligibility Policy: We brought some procedures into this policy and some came from the state policy. One change is the “needs additional assistance” definition. Previously the state defined this for us. They are now allowing local areas to define, effective on the approval of their policy being approved. We did have to back up our criteria we wanted to use to define if someone will be made eligible for needing additional assistance.
- Youth Program Design and Incentives Policy: Last committee meeting we had approved the incentives policy. Placement and postsecondary now changed to say ISY in secondary.
 - **MOTION: Justin Crice moved to approve the above policy changes and Landy Fuqua seconded the motion. All were in favor and the motion carried.**

Other: The state dept of Labor submitted 2 waivers.

- Youth Waivers: We are about 6% ISY, and this waiver requires us to get to 35% ISY this year, which will be very difficult. Hopefully no sanctions. We can also serve post-secondary, but age is limited to 21. Looking for ways to serve high school students.
- American Job Center Services Update: Dyersburg will be reopening Wednesday. Because we did have a positive Covid case, it was cleaned again today and ready for reopening. Connie shared some guidance from TBR about when to close for exposure, and we plan to adopt this policy. All the other centers are open and have security that goes through end of August.

Future Meeting Dates & Upcoming Events

- Next Board Meeting: August 25th (Zoom) at 11:30.
- State Board Meeting: August 28th (YouTube). Will record the regional and local plans to view ahead of time. Hopefully the plans will be approved without conditions.
- Regional Planning Council Meeting: September 22nd, 10:00 am (webinar)
- Remaining 2020 Committee Meeting Date: October 26th, 1:00 pm

Respectfully submitted,

Lana Burchfiel, Public Information Specialist

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Outreach and Opportunities Committee
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Meeting ID: 899 8343 5210

Password: 734081

Chair – Ben Marks

Vice Chair – Glad Castellaw

Agenda

1. Welcome and Call to Order Ben Marks
2. Review and Approval of Minutes of April 27, 2020 Meeting **(Vote Required)** Ben Marks
3. Consideration of Eligible Training Provider List Programs Laura Speer
 - a. TCAT Newbern Certified Production Technician (CPT) Program Renewal **(Vote Required)**
4. Promising Practices/ Supplemental Grant Updates & New Opportunities
 - a. Apprenticeship Grants (TDLWD & DRA) Ginger Powell
 - b. RESEA Grant Jennifer Bane
 - c. National Dislocated Worker Grant (DWG)
 - d. Others (GIVE – Partnership with DSCC; DSCC Delta Healthcare Grant Partnership)
5. Special Populations Updates
 - a. Target Populations Report Erica Nance
 - b. Youth Services Connie Stewart/Ginger Powell
 - o Registered Electrical Apprenticeship Preparation
 - o Benton County WORKLife Program (Rural Initiative Funding)
 - c. Offenders; RAMP (Rural Initiative Funding) Ginger Powell
6. Consideration of New / Revised Policies **(Vote Required)** Jennifer Bane
 - a. Training Provider Approval Policy Changes
 - b. Youth Eligibility Policy
 - c. Youth Program Design and Incentives Policy
7. Other Jennifer Bane
 - a. Youth Waivers
 - b. American Job Center Services Update

Future Meeting Dates & Upcoming Events

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Meeting ID: 829 7896 7024 and Password: 643787\$nw

Chair – Ben Marks

Vice Chair – Glad Castellaw

Minutes

Committee members attending via webinar: Justin Crice, Brad Hurley, John Glad Castellaw, Gayanne Williams, Lindsey Frilling, Amy McDonald, Jon Dougherty, Dr. Karen Bowyer, Lindsay Frilling, Landy Fuqua

Staff attending via webinar: Jennifer Bane, Laura Speer, LeAnn Lundberg, Gina Johnson, Lana Burchfiel, Ginger Powell

Others attending via webinar: Erica Nance, Connie Stewart, Jennifer Eppley, Dr. Reid Bunch

Review and Approval of Minutes of January 27, 2020 Meeting: Glad Castellaw called the meeting to order and the group was asked for comments regarding the prior meeting's minutes.

- **MOTION: Brad Hurley moved to approve the January 27, 2020 minutes and Justin Crice seconded the motion. All were in favor and the motion carried.**

Consideration of Eligible Training Provider List Programs: The committee received handouts (attached) for each of the below programs with the details of the program and the related labor market information.

- **Program Renewals: DSCC – AAS in Health Sciences:** Dr. Bowyer and Dr. Reid Bunch both abstained from voting and discussion.
 - **MOTION: Brad Hurley moved to approve renewal of the AAS in Health Sciences at Dyersburg State Community College and Justin Crice seconded the motion. All were in favor and the motion carried.**
- **New Programs:** Laura Speer presented the following for recommendation of committee approval.
 - **Bethel – Pharmacy Technician:** Southwest asked that we consider adding this program, that is offered in their area. Since Bethel's main campus is located in our area, our Board must review.
 - **TCAT Newbern – Computer Information Technology:** Class begin May 4th so the program will also be presented to the Executive Committee.
 - **DSCC – Certified Clinical Medical Assistant. CCMA:** The program was previously on the list but was removed due to performance issues. Updated performance information has shown the program's graduates are entering into related occupations. Madison County was added into the labor market information to show growth. There is not as much growth in our 9 counties, but for other areas to fund the program it has to first be approved in our area. Dr. Bowyer and Dr. Reid Bunch both abstained from voting and discussion.
 - **MOTION: Justin Crice moved to approve the above new programs as presented and Jon Dougherty seconded the motion. All were in favor and the motion carried.**

Promising Practices/ Supplemental Grant Updates & New Opportunities:

- **Apprenticeship Grants (TDLWD & DRA):** Ginger Powell reviewed the attached chart shows our goals are on track with spending and individuals served. Ginger pointed out 17 total participants we have served at this time, and we hope to enroll a few more in the next few months. We have one new pre-apprenticeship, and two new apprenticeship occupations, with several other potential apprenticeships in progress. We are also working with the Southwest and Greater Memphis areas to promote apprenticeships. Jack Laser is our new West TN Director through the TN Office of Apprenticeship led by Tyra Copas. We hope to hold a forum in Northwest TN after social distancing has passed. Ginger said she will send new contact information out for Jack Laser.
- **RESEA Grant:** Jennifer Bane reported that through our RESEA grant, 452 individuals were scheduled for first RESEA services with 218 completing between October and March as shown on the report

included with the handouts. There were 410 subsequent visits completed, 16 individuals referred to Title I, and 42 placed in employment.

- Others, GIVE – Partnership with DSCC; DSCC Delta Healthcare Grant Partnership: Jennifer reported that we had planned to partner with Dyersburg State to offer a healthcare career exploration event for Dyer and Lake County High School Students in May, but due to COVID-19, we hope to offer it in the fall. Individuals will tour DSCC and healthcare employers. Dr. Bowyer said they did receive Delta Healthcare grant and have some materials to deliver to the AJs related to the opioid crisis. She also told the committee that DSCC has added to their website some virtual tours of the labs, so we can do a virtual event if we are unable to get something scheduled by Fall.

Special Populations Updates:

- Target Populations Reports: Erica Nance reviewed the attached Targeted Population Summary Report, which showed 50 new enrollments-- 7 of those were youth-age and 2 veterans. We have been getting notifications from Jobs4TN when a new veteran registers so Veterans staff can reach out and offer services. There were also 21 offenders served.
- Youth Services:
 - Registered Electrical Apprenticeship Preparation (RAEAP): Ginger explained we had to make a few modifications for showcase visits due to schools letting out early for COVID-19. Some showcase events were held in February, so we only missed a few scheduled for April for Henry County, Milan, and Dyer County High Schools. We are still continuing to recruit students by working with teachers, principals, and CTE instructors. Shock and Awe was rescheduled from May 2 to June 6. Ginger has updated all information to reflect the new date and has asked the schools to pass this on by using their communication methods such as Remind App, emails, etc. We are going to create posts on our Facebook account to be shared by the schools, as well. Jon Dougherty said staff will be June 1-5 at the Dyersburg location if a potential participant requests a face-to-face meeting with him. Justin Crice asked if the 2-week training is still scheduled for July 13-24th, and it is. Connie Stewart asked Jon if students could begin work experience after Shock and Awe Day and before the July class like last year. Jon would like to start a few earlier if available. Ginger also said the wages will be \$13.25 this year instead of \$12.50. We will be paying the Youth participants 100% of that wage for work experience. Connie said Jon and Perry did such a great job with that group last year by going above and beyond mentoring and really driving them. Connie feels this has been the most successful program we had last year.
 - Benton County WORKLife Program: Ginger reported that the large WORKLife hiring event we had planned in March through Rural funding had to be rescheduled for June 2nd. We plan to match employers and graduated seniors interested in participating in Summer Work Experience. Connie's staff will be available at the event to make sure students are eligible in hopes that students will be able to start work that following Monday. The event will be publicized on the radio, the Mayor's Facebook page, our Facebook page, etc. We are trying all avenues to make sure no one will miss this opportunity. Participants can work out up to 6 months.
- Offenders; RAMP: Ginger explained our RAMP report looks different this time with the addition of the employment performance indicator. The report also shows a breakdown of individuals who are active participants and those exited, including for exclusionary reasons such as deceased, medical reasons, etc. Gibson County has had 8 classes with 84% earning the full Certified Production Technician (CPT). Another class will be offered in the fall. Dyer County has had four classes with just 34% earning the full CPT and had 66% of participants exited as exclusionary. Henry County held two classes with 20 students. Only 10% earned the full CPT, and only 10% are employed. Lake County started their first class under the Rural Initiative funding and should complete mid-May, so still in progress, but we anticipate low numbers due to several students no longer being in the class. Obion County will begin a class through TCAT Newbern after the Lake County class completes. Carroll County's class is also in progress, using the same instructor as the Henry County class, but on hold due to the instructor not being able to enter the facility because of COVID-19. Weakley County is focusing on the work-release component, which is also on-hold due to COVID-19.

Jennifer also added that exclusionary exits are completely taken out of the performance numbers, so it doesn't count as a positive or a negative. New guidance provided by State staff now indicates that

someone who is enrolled while currently incarcerated, cannot be exited as exclusionary for being incarcerated. Many of the exclusionary exits we have taken would now be counted as negatives under this guidance. The state staff does agree that if someone is released and then incarcerated they will be exclusionary, but there are a lot of reasons someone currently incarcerated is unable to go to work through work release and become a positive. Ideally the participants would be nearing completion so that they can go to work soon, but that's not always the case. We've had some released before class completed, but some who have years before they are released, so we cannot make them a positive if they are unable to participate in work release.

Dyer County was able to use YMCA as men's facility to house inmates so they can continue to go out to work but be kept separate from the general population at the jail. Ginger also mentioned a partnership between Lake and Dyer County jails to allow Lake County inmates to be transferred to Dyer County for work-release. Since there are not enough jobs in Lake County to employ the inmates, this will avoid the logistics and cost of transporting inmates outside the county to go to work. Dyer County may also transfer inmates to Lake County to participate in classes.

Consideration of New / Revised Policies: Jennifer Bane presented two policies to the committee for review and approval.

- **Training Provider Approval Policy Changes:** Changes are outlined in red in the attachments and include updating our administrative office address and a reference to required performance standards. We must submit this policy as an attachment to our local plan.
 - **MOTION: Justin Crice moved to revised Training Provider Policies as presented and Amy McDonald seconded the motion. All were in favor and the motion carried.**
- **Youth Incentives Policy:** This new policy offers incentives to Youth participants to attain certain milestones, in hopes that it will help get and keep youth participants engaged, especially in work experience (WE). We polled other areas in state to see what they were doing with incentives. One area, Northeast, had the most comprehensive policy, but they have not had it very long, and have not been using it due to availability of funding. A Youth Program Design policy will also be reviewed at the State Workforce Board meeting in June, and some of the introductory information in our policy is based on the draft of that policy. Incentives must be tied to a specific program and a specific achievement, so we have broken them down within programs. Since WE is already paid, we are suggesting only a few additional incentives including successful completion of the first two weeks and then again after 4 weeks. Since DSCC only pays once a month, this will also help participants while they are waiting to get paid. The policy also includes incentives for progress towards and attainment of a HiSet, and transitioning to postsecondary training for WE participants. Attainment of a credential, a National Career Readiness Certificate (NCRC), or improved NCRC would also be incentivized. As of 2017 all 11 counties had reached Work Ready Community Goals, but we have to meet goals to maintain that status. We applied for funds to be able to offer testing and are hoping this will still come through. One goal is emerging youth workforce to earn a NCRC certificate or improve their certificate. Incentives are also proposed for placement in postsecondary or part-time or full-time regular employment for the four quarters after exit. Participants could earn the incentive for placement in one or the other, but not both. Supporting documentation must be provided before payment and specific internal controls must be in place. The policy requires payments be made by check or direct deposit to avoid having to safeguard cash or gift cards. A system similar to the gas card might be able to be approved if one is found.
 - **MOTION: Brad Hurley moved to approve the draft Youth Incentives Policy as presented and Jon Dougherty seconded the motion. All were in favor and the motion carried.**

Local Planning, Operations Systems & Strategies: Ginger Powell reviewed the attached PowerPoint on planning guidance and preliminary responses to Sections C, D, F, G, K, L of the Operations Systems & Strategies portion of the local plan.

- **Supporting TN Combined State Plan Strategy:** To increase the competitive position of TN business through the development of a high skilled workforce.
- **Strategies to Enhance Services & Avoid Duplication**

- Youth Activities: 14 youth required elements and services designed to provide toset. This was a big focus on the last plan.
- Services to Priority Populations
- Initiatives for Rural / At-Risk / Distressed Counties: RAMP, #WORKLife, Apprenticeships and Pre-Apprenticeships, Pathways, Work Ready Communities.
- Initiatives for Previously Incarcerated / Justice-Involved (RAMP, etc)

Other: Jennifer Bane provided an update on American Job Center services. A preliminary call with TN Department of Labor staff provided preliminary guidance on developing a plan on how to reopen the centers. They are strongly encouraging a phased approach, the use of gloves and masks, and security for the AJCs due to concerns over the heavily burdened unemployment. Lots of people are frustrated and still waiting on their money. We must also make sure that we can maintain social distancing by limiting staff and customers on-site at one time, possibly by opening by appointment only. We will have to take temperatures of staff, and possibly customers. In the affiliates and specialized centers that are in other's buildings, we cannot open until the buildings are opened to the public, which might affect our timeline. OSO staff are primarily working on unemployment questions from the office while Title I staff are working remotely. Thankfully, we had technology in place to work from home prior to COVID-19, but it is a much slower process to enroll someone this way. Some funding might be available. We did ask for money (\$857,000) for our area to put some people to work for cleanup efforts, mainly public buildings like schools and libraries that need to be cleaned. They are talking about having some interim funding until we receive that funding. We also asked for funding for scholarships for Dislocated Workers. We have moved much of our Dislocated Worker funds to Adult funds, but if there is an increase in Dislocated Workers needing to be served, we won't have enough funding.

Future Meeting Dates & Upcoming Events: The following upcoming meetings were reviewed:

- Local Planning Meeting, May 19th, 10:00 am
- Regional Planning Council Meeting: May 28th, 10:00 am (webinar)
- State Board Meeting: June 5th
- Next Board Meeting: June 10th, 12:00 pm (lunch at 11:30 am)
Northwest Development District, 124 Weldon Drive – Martin
- Remaining 2020 Committee Meeting Dates: July 27th & October 26th, 1:00 pm

Respectfully submitted,

Lana Burchfiel, Public Information Specialist

Eligible Training Providers – By Program Status

Provider Name	ProgramTitle	CIP Title	Completion Level	Occupation Title	2020 Jobs	2024 Jobs	2020 - 2024 Change	Annual Openings	Avg. Hourly Earnings
Tennessee College of Applied Technolog-Newbern (Main Campus)	Certified Production Technician	Manufacturing Technology / Technician	An industry-recognized certificate or certification	Machine Operator, Material Tester, Production Assemblers, Production Worker, Machinists	11,705	11962	257	1,524	\$16.57



Quarterly Report – Narrative Questions

Please answer the following questions. Include this document as an attachment to your quarterly report.

Submission Date: July 15, 2020

Grant Recipient: Northwest Tennessee Workforce Board

Project Name: EARN\$TN - Expanding Apprenticeships in Rural Northwest Tennessee

City: Dyersburg **County/Parish:** Dyer **State:** **TN**

Point of Contact: Jennifer Bane

Email: jbane@nwtworks.org **Phone:** 731-286-3585

	Proposed Outcomes	Actual Outcomes
Individuals Trained (pre-apprenticeship or apprenticeship)	24	17
Industry Certificates Awarded	20	0
Job Created	8	0
Jobs Retained	8	17
Employer Outreach Events	18	5
Registered Apprenticeship Occupations	6	2
Pre-Apprenticeships	2	1
Jobseeker Recruitment Events	12	10
Funding Support	\$45,000	\$8,539.35

I. During the period of performance, what project activities occurred and what was accomplished? Describe all major tasks and deliverables.

The overarching goal of the EARN\$TN grant proposal is to grow apprenticeships in rural northwest Tennessee. All outcomes are listed below in the response to question 3. Below is a chronological account (during this period of performance April 2020 – June 2020) of project activities to push northwest Tennessee toward our ultimate goal:

April 2020 –

- NW TN Workforce Board staff met with employers to discuss the benefits of beginning a Registered Apprenticeship program:
 - *Meetings were postponed due to coronavirus*
- Speaking Engagements & Events:
 - 4/20/2020 “Ask Your Business Services Rep” Zoom Meeting – 9 employers attended and benefits of starting an apprenticeship were shared
 - 4/21/2020 McKenzie, TN Rotary Club Speaker via Zoom – topic: Apprenticeship
 - 4/21/2020 Mayor’s Community Update Guest Speaker via Facebook Live, Benton County, TN – spoke on the benefits of Apprenticeship
 - *Additionally scheduled speaking engagements at 3 area high schools to recruit for an electrical pre-apprenticeship program were cancelled due to school closings for coronavirus. Students were reached electronically with the assistance of school personnel.*
- Social Media: *all posts focused on TNDOL unemployment and unemployment insurance troubleshooting due to the overwhelming demand created by the pandemic.*

May 2020 –

- NW TN Workforce Board staff met with employers to discuss the benefits of beginning a Registered Apprenticeship program:
 - Outreached to over 30 employers in Benton County by phone and door-to-door with Chamber Rep to encourage Apprenticeship as a means to grow and keep talent locally in a rural town
 - Ongoing virtual meetings– planning and coordinating marketing and outreach campaign for Amteck’s upcoming 2020 enrollment of electrical apprentices.
- Social Media:
 - 5/21/2020 created Registered Electrical Apprenticeship Preparation (REAP) Shock and Awe! Day event on the American Job Centers of Northwest Tennessee’s Facebook page
 - Requested all local High School share the event

June 2020 –

- NW TN Workforce Board staff met with employers to discuss the benefits of beginning a Registered Apprenticeship program:
 - 6/18/2020 connected with Missouri State University VESTA Special Programs Coordinator and Crown Winery to develop the Related Technical Instruction for a Vineyard Foreman Apprenticeship
- Speaking Engagements & Events:
 - 6/2/2020 #WorkLife Event – 2020 Benton County Graduates attended a matchmaking session with local employers for Work Experience opportunity over the summer months. Staff engaged one-on-one with employers regarding developing apprenticeships and growing the young talent to keep in rural northwest Tennessee.
 - 6/5/2020 REAP (Registered Electrical Apprenticeship Preparation) Shock and Awe! Day – held at Amteck in Dyersburg, TN, 2020 graduates attended a half-day session where they were shocked (literally) and awed by lifting up in a bucket truck. Recent graduates were also assessed by the employer and interviewed for an upcoming summer pre-apprenticeship program.
 - 6/25/2020 REAP (Registered Electrical Apprenticeship Preparation) Amteck University Registration Day – eligibility was expanded to include youth ages 18-24 years old for the

summer pre-apprenticeship program. The Workforce Board did extensive outreach and co-hosted the registration event on-site at Amteck in Dyersburg, TN.

- Social Media:
 - 6/2/2020 created and posted to Facebook a 3-minute video in a Q&A format with Amteck Staff, on-site in the training facility, promoting the upcoming Shock and Awe! Day event and the REAP (Registered Electrical Apprenticeship Preparation) pre-apprenticeship program
 - 6/4/2020 created and posted on Facebook a short, on-site video reminding followers of the upcoming Shock and Awe! Day event. Staff were featured in an Amteck electrical bucket truck drawing attention to the activities planned for the event
 - 6/11/2020 listed a Job Posting to Facebook for the REAP pre-apprenticeship jobs to generate interest and outreach
 - 6/12/2020 utilized the REAP logo to further promote the REAP Amteck University Registration Day event on Facebook
 - 6/25/2020 REAP Amteck University Registration Day reminder post to Facebook

2. During the period of performance, were all approved project activities completed? Explain why or why not.

The Northwest Tennessee Workforce Board is on track to complete all proposed deliverables and reach all outcomes projected. With the remaining time period for the grant, we expect to accomplish all tasks. We have exceeded 50% of proposed apprentices and are 33% of the way to our new registered apprenticeship goal. We have several Zoom meetings scheduled for July to hopefully secure another grape and wine industry apprenticeship as well as enroll new apprentices. The Northwest Tennessee Business Services Representatives are continuing to meet virtually with employers introducing the apprenticeship model. The Tennessee Office of Apprenticeship also named a new position of West Tennessee Apprenticeship Director and hired for the position. We are working hand-in-hand with the new director to accomplish our mutual goal of growing apprenticeship in west Tennessee.

3. What outcomes have been realized so far? Describe the specific tools used to measure outcome achievement. Are the proposed outcomes still achievable during the period of performance? Explain why or why not?

- 17 first-year apprentices enrolled in registered apprenticeships
 - Coordination of funds for apprentices
- 2 newly developed apprenticeships registered through USDOL
- 1 new Pre-Apprenticeship Work Experience developed
- 15 Speaking Engagements & Events held
- 12 posts to our American Job Centers of Northwest TN Facebook page promoting Apprenticeships

All proposed outcomes are still achievable during the period of performance. We are progressing and on-track to achieve all goals.

4. Do you have specific needs for technical assistance that DRA can help provide during or after the life of the grant? Explain.

Not at this time.

Services Provided Individuals - All Services

- Program: Title III - Wagner-Peyser (WP)

- Region/Lwia: Northwest Tennessee

- Service Code: 190 - First Scheduled RESEA, 191 - RESEA Reschedule, 192 - RESEA Failed to Report, 193 - RESEA Placement, 194 - RESEA Exempt, 195 - RESEA UI Eligibility, 196 - RESEA Subsequent Schedule, 197 - RESEA Subsequent Completed, 198 - RESEA Program Completed, 19A - RESEA Compliant, 19B - RESEA Refused Service, 19D - RESEA Disqualification, 19E - RESEA Enrolled in Title I, 19R - RESEA Referred to Title I, 19X - RESEA UCX Participant, 592 - RESEA Referred to Reemployment, 593 - RESEA Referred to Training

- Veteran Information From: Both

- Date Field: Schedule Date

- Start Date: 10/1/2019

- End Date: 6/30/2020

Activity/Description	Distinct Users	Total Services	% of Total
190 - First Scheduled RESEA	452	452	14.55%
Successful Completion		203	44.91%
191 - RESEA Reschedule	67	79	2.54%
192 - RESEA Failed to Report	148	153	4.93%
193 - RESEA Placement	44	46	1.42%
194 - RESEA Exempt	25	27	0.87%
195 - RESEA UI Eligibility	482	965	31.07%
196 - RESEA Subsequent Schedule	322	323	10.40%
197 - RESEA Subsequent Completed	336	425	13.68%
198 - RESEA Program Completed	296	298	9.59%
592 - RESEA Referred to Reemployment	257	257	8.27%
593 - RESEA Referred to Training	11	11	0.35%
19A - RESEA Compliant	50	52	1.67%
19X - RESEA UCX Participant	3	3	0.10%
19R - RESEA Referred to Title I	16	17	0.55%
Activity/Description	Distinct Users	Total Services	% of Total
	2,509	3,106	100%



**STATE OF TENNESSEE
DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT**

220 French Landing Drive
Nashville, TN 37243
(615) 741-6642

BILL LEE
GOVERNOR

JEFF McCORD
COMMISSIONER

June 30, 2020

Jennifer Bane, Executive Director
Northwest Tennessee Workforce Board
208 North Mill Avenue
Dyersburg, TN 38024

Dear Ms. Bane:

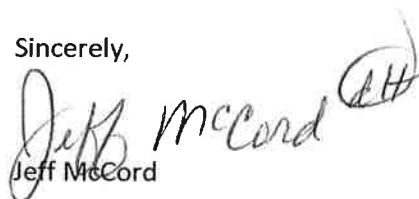
Under the *Workforce Innovation and Opportunity Act* (WIOA) Sec. 170, funds for the National Dislocated Worker Grant for the project entitled COVID-19-TN-Disaster Recovery have been released. Northwest Tennessee Workforce Board is being awarded \$249,088.00 to support the COVID-19 emergency response to the Northwest Tennessee Local Workforce Development Area in the State of Tennessee.

Please note the funding allocation for \$249,088.00 awarded is as follows: \$24,908.00 for administrative purposes; and \$224,180.00 for programmatic activities. The contract will be provided from the COVID-19 Disaster Recovery National Dislocated Worker Grant and will have an effective date beginning 07/01/2020 and ending 06/30/2022.


Northwest Tennessee Workforce Board agrees to comply with all reporting requirements in the manner specified by the State and under all applicable laws, regulations, and instruction in order to account for all funds expended by the Grantee.

Should you have any questions or need to modify the scope of the program, please contact Chandra Pleas, Director of Grants and Budgets, at (615) 313-5771.

Sincerely,


Jeff McCord

CEP/DF/BE




COVID-19 NATIONAL DISLOCATED WORKER GRANT (NDWG)

July 2020

Nan Greenfield, Account Administrator


OVERVIEW

- Review of Funding Opportunity Notice
- Project Activities
 - Disaster-Relief Employment
 - Employment/Career and Training Services
 - General Policies: Disaster Recovery DWGs
 - Worksite Management
- Questions & Answers




PROJECT ACTIVITIES — DISASTER RELIEF EMPLOYMENT

- Disaster-relief employment created under a Disaster Recovery DWG must align with the following categories:
 - Clean-up and recovery efforts including demolition, repair, renovation and reconstruction of damaged and destroyed structures, facilities and lands located within the disaster area and in offshore areas related to the emergency or disaster; or,
 - Employment related to the delivery of appropriate humanitarian assistance in the immediate aftermath of the disaster or emergency; more information on humanitarian assistance is provided below.




PROJECT ACTIVITIES — EMPLOYMENT/CAREER AND TRAINING SERVICES

- Employment and Training Services. DWG projects provide employment and training services to dislocated workers and other eligible participants following a qualifying disaster or emergency. DWG funds may provide employment and training services regardless of an individual's participation in disaster relief employment.
- Supportive Services. Supportive services are allowable when they are needed to enable individuals to participate in disaster relief employment and employment and training services and when supportive services cannot be obtained through other programs. Supportive service policies for a disaster project must align with the state or local area supportive service policy; any supportive services provided must be consistent with WIOA.




PROJECT ACTIVITIES — GENERAL POLICIES

- Maximum employment of 12 months or 2,080 hours, whichever is longer
- Participant wages threshold of \$20,000 (excess requires prior approval)
- Focus specifically on responding to the immediate impacts of a disaster and not focus solely on prevention and planning of future disaster events.
- Humanitarian assistance costs must only include enrolled participant costs for delivering the assistance and not include costs for the humanitarian aid itself (e.g. food, supplies)
- Layoff aversion and related activities are not allowable
- Upskilling/training incumbent workers is not an allowable activity as incumbent workers are ineligible to participate



PROJECT ACTIVITIES — WORKSITE MANAGEMENT

- Alignment between the Worksite Management Plan and the plan to monitor community needs.
- A general structure for worksite oversight.
- A timeline for reviewing enrollment and worksite developments.
- Policies and internal controls are in place to ensure compliance with general policies for disaster recovery under TEGL 12-19.
- Procedures are in place for determining and responding to new needs or challenges in accordance with DWG requirements, such as limits on disaster-relief employment duration, participant wages, worksite selection, work on private property, and health and safety standards.
- Procedures are in place to ensure worksites give the highest priority to the cleanup and the provision of humanitarian assistance to economically disadvantaged areas within the disaster area.
- Procedures are in place to ensure new worksites and disaster-relief jobs are determined based upon the approved grant agreement and scope of work.



WIOA Targeted Population Summary

- State Region: West TN
 - LWIA/Region: Northwest Tennessee
 - Filter By Date: Active Date
 - Date Range: 6/1/2020 - 6/30/2020

Target Group	Total Enrolled	New Enrolled	Received Career Services	Received Training/ Educ Svcs	With Credent
Total	<u>1,060</u>	<u>133</u>	<u>483</u>	<u>430</u>	<u>76</u>
Gender					
Female	<u>480</u> 45.28%	<u>89</u> 66.92%	<u>252</u> 52.17%	<u>223</u> 51.86%	<u>32</u> 42.11%
Male	<u>573</u> 54.06%	<u>43</u> 32.33%	<u>230</u> 47.62%	<u>206</u> 47.91%	<u>44</u> 57.89%
NA	<u>7</u> 0.66%	<u>1</u> 0.75%	<u>1</u> 0.21%	<u>1</u> 0.23%	0
Age					
18 and Under	<u>47</u> 4.43%	<u>10</u> 7.52%	<u>45</u> 9.32%	<u>32</u> 7.44%	<u>6</u> 7.89%
19 to 24	<u>212</u> 20.00%	<u>14</u> 10.53%	<u>170</u> 35.20%	<u>147</u> 34.19%	<u>30</u> 39.47%
25 to 54	<u>652</u> 61.51%	<u>92</u> 69.17%	<u>253</u> 52.38%	<u>239</u> 55.58%	<u>39</u> 51.32%
55 and Older	<u>149</u> 14.06%	<u>17</u> 12.78%	<u>15</u> 3.11%	<u>12</u> 2.79%	<u>1</u> 1.32%
Race/Ethnicity					
White	<u>899</u> 84.81%	<u>119</u> 89.47%	<u>381</u> 78.88%	<u>341</u> 79.30%	<u>62</u> 81.58%
African American/Black	<u>141</u> 13.30%	<u>13</u> 9.77%	<u>106</u> 21.95%	<u>91</u> 21.16%	<u>16</u> 21.05%
American Indian/Alaskan Native	<u>4</u> 0.38%	<u>1</u> 0.75%	<u>1</u> 0.21%	<u>1</u> 0.23%	0
Asian	<u>1</u> 0.09%	0	0	0	0
Hispanic	<u>34</u> 3.21%	<u>1</u> 0.75%	<u>11</u> 2.28%	<u>10</u> 2.33%	<u>1</u> 1.32%
Educational Status					
	<u>415</u> 39.15%	<u>107</u> 80.45%	0	0	0
In-school; Secondary School or less	<u>4</u> 0.38%	0	<u>4</u> 0.83%	<u>3</u> 0.70%	<u>2</u> 2.63%
In-school, Alternative School	<u>1</u> 0.09%	0	<u>1</u> 0.21%	<u>1</u> 0.23%	<u>1</u> 1.32%
In-school; post Secondary School	<u>129</u> 12.17%	<u>1</u> 0.75%	<u>129</u> 26.71%	<u>121</u> 28.14%	<u>30</u> 39.47%
Not attending school or Secondary School Dropout	<u>38</u> 3.58%	<u>1</u> 0.75%	<u>16</u> 3.31%	<u>14</u> 3.26%	<u>2</u> 2.63%

Not attending school; Secondary School Graduate or has a recognized equivalent	<u>473</u> 44.62%	<u>24</u> 18.05%	<u>333</u> 68.94%	<u>291</u> 67.67%	<u>41</u> 53.95%
UC Status					
Neither claimant or exhaustee	<u>14</u> 1.32%	0	<u>14</u> 2.90%	<u>14</u> 3.26%	<u>11</u> 14.47%
Veteran					
All Veterans	<u>18</u> 1.70%	<u>2</u> 1.50%	<u>11</u> 2.28%	<u>10</u> 2.33%	<u>2</u> 2.63%
Eligible Veteran Status	<u>18</u> 1.70%	<u>2</u> 1.50%	<u>11</u> 2.28%	<u>10</u> 2.33%	<u>2</u> 2.63%
Other Eligible Person/Veteran Spouse	0	0	0	0	0
Campaign Veteran	<u>4</u> 0.38%	0	<u>3</u> 0.62%	<u>3</u> 0.70%	<u>2</u> 2.63%
Disabled Veteran	<u>4</u> 0.38%	0	<u>2</u> 0.41%	<u>2</u> 0.47%	0
Transitioning Service Member	<u>1</u> 0.09%	0	<u>1</u> 0.21%	<u>1</u> 0.23%	0
Recently Separated Veteran	<u>3</u> 0.28%	0	<u>3</u> 0.62%	<u>2</u> 0.47%	0
Active Duty Military Spouse	<u>1</u> 0.09%	0	<u>1</u> 0.21%	<u>1</u> 0.23%	<u>1</u> 1.32%
Barriers					
Total With Significant Barriers to Employment	<u>567</u> 53.49%	<u>39</u> 29.32%	<u>420</u> 86.96%	<u>369</u> 85.81%	<u>64</u> 84.21%
Individuals with Disability	<u>23</u> 2.17%	0	<u>20</u> 4.14%	<u>16</u> 3.72%	<u>5</u> 6.58%
Displaced Homemaker	<u>2</u> 0.19%	0	<u>2</u> 0.41%	<u>2</u> 0.47%	0
Underemployed	<u>179</u> 16.89%	<u>8</u> 6.02%	<u>179</u> 37.06%	<u>172</u> 40.00%	<u>38</u> 50.00%
Dislocation Event	0	0	0	0	0
Within 2 Years of Exhausting TANF	0	0	0	0	0
Hawaiian Native	0	0	0	0	0
Single Parent	<u>68</u> 6.42%	0	<u>68</u> 14.08%	<u>63</u> 14.65%	<u>9</u> 11.84%
Facing Substantial Cultural Barriers	0	0	0	0	0
Eligible Migrant and Seasonal Farmworker	0	0	0	0	0

Meets Governors Special Barrier	0	0	0	0	0
English Language Learner	0	0	0	0	0
Basic Skills Deficient	<u>1</u> 0.09%	0	<u>1</u> 0.21%	0	0
Offender	<u>91</u> 8.58%	<u>1</u> 0.75%	<u>91</u> 18.84%	<u>87</u> 20.23%	<u>13</u> 17.11%
Homeless	<u>1</u> 0.09%	0	0	0	0
Runaway Youth	0	0	0	0	0
Foster Care (All)	<u>1</u> 0.09%	0	<u>1</u> 0.21%	0	0
In Foster Care	0	0	0	0	0
Aged Out of Foster Care	<u>1</u> 0.09%	0	<u>1</u> 0.21%	0	0
Pregnant or Parenting Youth	<u>20</u> 1.89%	0	<u>20</u> 4.14%	<u>14</u> 3.26%	<u>4</u> 5.26%
Out of Home Placement	0	0	0	0	0
Eligible Under Section 477	0	0	0	0	0
Youth Requires Additional Assistance	<u>20</u> 1.89%	<u>2</u> 1.50%	<u>20</u> 4.14%	<u>10</u> 2.33%	<u>2</u> 2.63%
Long-Term Unemployed	<u>116</u> 10.94%	<u>5</u> 3.76%	<u>105</u> 21.74%	<u>89</u> 20.70%	<u>15</u> 19.74%
Public Assistance					
TANF	<u>2</u> 0.19%	0	<u>2</u> 0.41%	<u>2</u> 0.47%	0
SNAP	<u>73</u> 6.89%	0	<u>73</u> 15.11%	<u>62</u> 14.42%	<u>12</u> 15.79%
Social Security Disability Insurance (SSDI)	<u>2</u> 0.19%	0	<u>2</u> 0.41%	<u>2</u> 0.47%	0
Supplemental Security Income (SSI)	<u>3</u> 0.28%	0	<u>3</u> 0.62%	<u>2</u> 0.47%	0
General Assistance	<u>1</u> 0.09%	0	<u>1</u> 0.21%	<u>1</u> 0.23%	0
Living in the High Poverty Area	0	0	0	0	0
Free or Reduced Lunch	<u>1</u> 0.09%	0	<u>1</u> 0.21%	<u>1</u> 0.23%	0
Low Income	<u>393</u> 37.08%	<u>23</u> 17.29%	<u>393</u> 81.37%	<u>342</u> 79.53%	<u>60</u> 78.95%

RE-ENTRY ADVANCED MANUFACTURING PROGRAM (RAMP)

6/30/2020

GIBSON COUNTY - TCAT Jackson - 8 classes					
Male (68 students) Female (8 students) = 76	Safety	Quality	Manufacturing	Maintenance	Full CPT
Assessments Passed/Taken	73/73	72/72	65/70	65/66	64/76
Percent Passed Assessment Taken	100%	100%	93%	98%	
Percent Passed of 76 Enrolled	96%	95%	86%	86%	84%

<i>Performance Indicator</i>	76	Exclusionary	Employed	Unemployed	Unknown
Exited Participants	48	15	20	13	0
		31%	42%	27%	0%
Active Participants	28	0	8	11	9
		0%	29%	39%	32%
Total Performance		20%	37%	32%	12%

DYER COUNTY - Dyersburg State Community College - 4 classes					
Female (23 students) Male (18 students)=41	Safety	Quality	Manufacturing	Maintenance	Full CPT
Assessments Passed/Taken	30/33	22/25	16/18	14/14	14/41
Percent Passed Assessment Taken	91%	88%	89%	100%	
Percent Passed of 41 Enrolled	73%	54%	39%	34%	34%

<i>Performance Indicator</i>	41	Exclusionary	Employed	Unemployed	Unknown
Exited Participants	36	26	7	3	0
		72%	19%	8%	0%
Active Participants	5	0	0	5	0
		0%	0%	100%	0%
Total Performance		63%	17%	20%	0%

HENRY COUNTY - TCAT Paris - 2 classes					
Male (20 students)	Safety	Quality	Manufacturing	Maintenance	Full CPT
Assessments Passed/Taken	11/17	7/15	7/14	3/11	2/20
Percent Passed Assessment Taken	65%	47%	50%	27%	
Percent of 20 Enrolled Passed	55%	35%	35%	15%	10%

<i>Performance Indicator</i>	20	Exclusionary	Employed	Unemployed	Unknown
Exited Participants	10	5	1	4	0
		50%	10%	40%	0%
Active Participants	10	0	5	2	3
		0%	50%	20%	30%
Total Performance		25%	30%	30%	15%

LAKE COUNTY - TCAT Newbern - 1 class					
Male (12 students)	Safety	Quality	Manufacturing	Maintenance	Full CPT
Assessments Passed/Taken	9/9	4/6	2/5	0/1	0/12
Percent Passed Assessment Taken	100%	67%	40%	0%	0%
Percent of 12 Enrolled Passed	75%	33%	17%	0%	0%
<i>Performance Indicator</i>	12	Exclusionary	Employed	Unemployed	Unknown
Exited Participants	4	4	0	0	0
		100%	0%	0%	0%
Active Participants	8	0	0	8	0
		0%	0%	100%	0%
Total Performance		33%	0%	67%	0%

CARROLL COUNTY - TCAT Paris - 1 class					
Female (10 students)	Safety	Quality	Manufacturing	Maintenance	Full CPT
Assessments Passed/Taken	9/10	<i>class suspended due to COVID-19</i>			
Percent Passed Assessment Taken	90%				
Percent of 10 Enrolled Passed	90%				
<i>Performance Indicator</i>	10	Exclusionary	Employed	Unemployed	Unknown
Exited Participants	0	0	0	0	0
		0%	0%	0%	0%
Active Participants	10	0	0	10	0
		0%	0%	100%	0%
Total Performance		0%	0%	100%	0%

TOTAL - ALL PROGRAMS - 15 classes (excludes Carroll County)					
Total Students - 149	Safety	Quality	Manufacturing	Maintenance	Full CPT
Total Assessments Passed	123	105	90	82	80
Percent Passed / Assessment Taken	93%	89%	84%	89%	
Percentage of 149 Enrolled Passed	83%	70%	60%	55%	54%
<i>Performance Indicator</i>	149	Exclusionary	Employed	Unemployed	Unknown
Exited Participants	98	50	28	20	0
		51%	29%	20%	0%
Active Participants	51	0	13	26	12
		0%	25%	51%	24%
Total Performance		34%	28%	31%	8%

By County Quarterly Expenditure Report for Rural Initiative Funding - June 2020

			Expenditures*				Participant Outomes		
LWDA	County	Funding Amount	Admin	Program	Total	% Expended	Goal	Actual	% Towards Goal
Northwest	Weakley	\$ 46,119	\$ 2,408.48	\$ -	\$ 2,408.48	5.22%	17	0	0.00%
Northwest	Obion	\$ 50,045	\$ 2,613.50	\$ -	\$ 2,613.50	5.22%	23	0	0.00%
Northwest	Carroll	\$ 50,865	\$ 2,656.33	\$ 19,000.00	\$ 21,656.33	42.58%	24	10	41.67%
Northwest	Benton	\$ 54,420	\$ 2,841.98	\$ 4,327.53	\$ 7,169.51	13.17%	21	2	9.52%
Northwest	Lake	\$ 171,698	\$ 8,966.60	\$ 47,897.50	\$ 56,864.10	33.12%	40	10	25.00%

**Expenditures are through 5/31/2020. Obion County RAMP class
estimated to begin 7/20/20.*

Training Provider Approval

Effective Date: August 25 ~~June 10~~, 2020

Duration: Indefinite

In order to receive funds under Title I of WIOA, a training provider must make application to the local Workforce Board for approval. Therefore, customers approved for ITA funds can only select from programs on the Eligible Training Provider List (ETPL). If a program is not on the list, WIOA cannot pay the cost of attendance.

In the State of Tennessee, the Tennessee Department of Labor and Workforce Development (TDLWD) is charged by the State Workforce Development Board with the responsibility to develop and maintain the Eligible Training Provider List. The Northwest local area agrees to adopt the procedures and formats provided by TDLWD for accepting and processing applications for the Eligible Provider List. Said procedures include processes and formats for Renewal Applications for “grandfathered” eligible providers and for others which have completed their period of initial eligibility, as well as processes for making initial application.

Interested applicants shall visit the Eligible Training Provider (ETP) website at www.Jobs4TN.gov in order to register and complete the appropriate application forms as provided by TDLWD within the system. Application forms are available online at the website listed above. Upon receipt of completed applications, a Sub-Committee of the Northwest Tennessee Workforce Board (NWTNWB) will review and make recommendation to the Northwest Tennessee Workforce Board for approval, denial or other additional/subsequent consideration. The Sub-Committee Committee, other committees of the NWTNWB, or NWTNWB members may request any additional information from the applicant institution deemed necessary. Applicants must provide all requested performance, cost, credentialing, articulation documentation, or other information requested by the Committee and/or the NWTNWB. The LWDB will review and approve applicants which are deemed to have met the criteria outlined in WIOA Subtitle B, Chapter 1, Section 122.

Finally, renewal applications must provide required performance data, meeting or exceeding performance standards as outlined in TDLWD policy, in order to remain on the Eligible Training Provider List. If approved, the NWTNWB will submit appropriate information and recommendation for addition to the Statewide Eligible Training Provider List in the Jobs4TN system.

Monitoring

The TDLWD will monitor the LWDBs for ETPL compliance at a minimum of every two (2) years. The LWDBs must monitor a minimum of fifteen percent (15%) of a training providers' program each year between July 1 and June 30. The LWDB staff will randomly select WIOA participant files and validate that the data has been uploaded into the system correctly, ensuring that the yearly Federal ETP report is accurate. Additionally, the LWDBs must establish monitoring procedures and will provide a copy of this process to the ETPL Coordinator upon request. The NWTNWB's monitoring procedures shall include:

1. Running reports in Jobs4TN quarterly to identify programs due for renewal.
2. Selecting a sample of the ETP's programs due for renewal that representative of at least 15% of the ETP's programs on the ETPL.
 - a. If the programs due for renewal do not constitute a large enough sample, additional programs will be selected at a later time in the program year when they are due for renewal, or
 - b. If additional programs are not due for renewal within the program year, additional programs will be selected at the time of the review.
3. Completing a review of the selected programs by:

- a. Verifying the information in Jobs4TN is complete and accurate.
 - b. Ensuring a copy of the accrediting body's receipt letter or exemption certificate is on file.
 - c. Ensuring the program is still in-demand.
 - d. Evaluating the process in place for tracking student and WIOA participant progress, completion, placement, and earnings for required performance measures.
 - e. Verifying that the annual ETPL performance report for the program has been submitted timely and with accurate information.
 - f. Ensuring all applicable performance standards were met in accordance with TDLWD policy.
 - g. Verifying the number of WIOA participants served.
 - h. Selecting a 10% sample of WIOA participants, including at least one student per program being monitored, for review.
 - i. Validating that the data has been uploaded into the system correctly, ensuring that the yearly Federal ETP report is accurate.
4. Monitoring results will be documented and kept on file by the LWDB staff.

Training Providers Appeal Process

If a Local Workforce Development Board (LWDB) rejects an application for initial eligibility determination for a program of training service, the LWDB must provide notice with the letter of rejection containing the reasons for rejections as well as the availability of an appeals process.

Local Appeals

Each LWDB maintains a written appeal process. The procedure includes an opportunity for a hearing, with a final written decision on the appeal to be provided within sixty (60) days of the date of the LWDB's receipt of the request for appeal. If the provider is not satisfied with the outcome of the local appeal, a provider may submit a formal appeal to the State appeals committee.

Should an application for addition to the ETPL be denied by the NWTNWB, the NWTNWB will notify the applicant of the denial, the reason(s) for the denial, and information on the appeal process within ten (10) working days. Notification shall be written and may be transmitted by U. S. Postal Service, Return Receipt Requested, Fed Ex or other package delivery service, by facsimile transmission, and/or electronically through e-mail. The applicant institution may access the approved NWTNWB appeal process, as follows:

1. The institution must request, in writing, additional consideration by the NWTNWB and its Sub-Committee of at least 1 – 3 impartial appeal officers (i.e. any staff or board members uninvolved in the initial decision). The written request must be submitted within 10 working days of receipt of written notification of denial or need for additional information/review by the NWTNWB.

Address local appeals to the Northwest Tennessee Workforce Board, Attn: Executive Director and Board Chairman at 208 N. Mill Ave. in Dyersburg, TN 38024, (731) 286-3585, TDD # 711.

2. The NWTNWB Sub-Committee shall consider the appeal request within 30 calendar days of receipt of the written request for appeal and shall make a recommendation to the NWTNWB for approval, denial, or request for additional/subsequent information.

3. The NWTNWB must consider the appeal and the recommendation of the Sub-Committee and render a decision at its next regularly scheduled NWTNWB meeting, or within 60 calendar days from the date the NWTNWB received the written request for appeal from the provider institution, whichever is greater.

4. The applicant institution must be notified, in writing, of the decision of the NWTNWB within 10 working days of the NWTNWB final action, and the process for filing a State appeal in the event the provider is not satisfied with the outcome of the local appeal. As referenced above, written notification may be in the form of USPS Return Receipt Requested, Fed Ex or other package delivery service, facsimile transmission, and / or electronically using e-mail.

5. If the applicant disagrees with the action taken by the NWTNWB through its local appeal process, the applicant may access the appeal process through the THEC, according to established THEC appeal procedures, as outlined in the approved Strategic Five Year State Workforce Investment Plan for the State of Tennessee.

In the event an approved provider is removed or suspended from the ETPL, students enrolled through the Workforce Innovation and Opportunity Act (WIOA) prior to the suspension/removal will be allowed to continue their training using WIOA funds until completion. No new students may be enrolled into a suspended/removed institution until official notification of reinstatement has been received.

State Level Appeals

This procedure applies only to training providers who have exhausted the appeal process of a Local Workforce Development Board and are dissatisfied with the Local Workforce Development Board's final decision.

(1) A training provider wanting to appeal to the State must submit an appeal request to the State within 30 days from the LWDB's notification to the training provider of its final decision on an appeal. The request for an appeal to the State must be in writing and include a statement of the desire to appeal, specification of the program(s) in question, the reason(s) for the appeal (i.e. grounds), and the signature of the appropriate provider official.

(2) The State will promptly notify the LWDB when it receives a request for appeal. The State will also notify the LWDB when it makes the final decision on an appeal.

(3) The State appeal process includes the opportunity for the appealing training provider to have a hearing. The hearing officer must be impartial. The hearing officer must provide written notice to the concerned parties of the date, time, and place of the hearing at least 10 calendar days before the scheduled hearing. Both parties must have the opportunity: to present oral and written testimony under oath; to call and question witnesses; to present oral and written arguments; to request documents relevant to the issues(s), and to be represented.

(4) The five-member State appeals committee, chaired by the hearing officer, will administratively review the appeal, make a preliminary decision, and notify the training provider and the LWDB. The committee may either uphold or reverse the LWDB decision.

(5) The State appeals committee must render a decision within 60 days from receiving the training provider's initial State appeal request.

References:

Workforce Services Policy - Eligible Training Provider List, TN-WIOA (16-9); Title I of the Workforce Innovation and Opportunity Act of 2014 (29 U.S.C. 3101 et seq.); Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.); WIOA Section 188 Nondiscrimination; WIOA Section 122

Vetted and Approved by the Northwest Tennessee Workforce Board: August 25 ~~June 10~~, 2020

Jimmy Williamson, Chair
Northwest Tennessee Workforce Board

Youth Eligibility – ~~Special Eligibility Definition~~

Effective Date: ~~August 28~~ November 19, 2020~~19~~

Duration: Indefinite

Purpose: To establish policy to ~~provide guidance on WIOA Title I youth program eligibility requirements, policies, and procedures consistent with state and federal requirements and to define “requires additional assistance to enter or complete an educational program, or to secure or hold employment.” and Youth Self-Sufficiency.~~

Policy: Youth must meet eligibility requirements to participate in the WIOA Title I youth program. WIOA section 129(a)(1) establishes separate criteria for out-of-school youth (OSY) and in-school youth (ISY).

WIOA Section 129(a)(1)(B) defines OSY as an individual who is:

1. not attending any school (as defined under State law);
2. not younger than age 16 or older than age 24; **and**
3. one or more of the following:
 - a. a school dropout.
 - b. a youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter.
 - c. a recipient of a secondary school diploma or its recognized equivalent who is a **low-income individual and** is (a) basic skills deficient; **or** (b) an English language learner.
 - d. an individual who is subject to the juvenile or adult justice system.
 - e. a homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))), a homeless child or youth (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))), a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement.
 - f. an individual who is pregnant or parenting.
 - g. a youth who is an individual with a disability.
 - h. **a low-income** individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

WIOA Section 129(a)(1)(C) defines ISY as an individual who is:

1. attending school (as defined by State law);
2. not younger than age 14 or (unless an individual with a disability who is attending school under State law) older than age 21;
3. a low-income individual; **and**
4. one or more of the following:
 - a. Basic skills deficient.
 - b. An English language learner.
 - c. An offender.
 - d. A homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))), a homeless child or youth (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))), a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an outof- home placement.
 - e. Pregnant or parenting
 - f. A youth who is an individual with a disability.
 - g. An individual who requires additional assistance to complete an educational program or to secure or hold employment.

Additionally, eligible youth must also be a citizen or national of the United States, lawfully admitted permanent

resident alien, refugee, asylum, and parolee, and other immigrant authorized by the Attorney General to work in the United States. Before enrollment in WIOA Title I funded services, all males who are at least 18 years old and have not reached their 26th birthday must be registered with Selective Services. If a male turns 18 while participating in any applicable services, registration with Selective Service must be completed no later than 30 days after he becomes 18 in order to continue to receive WIOA Title I funded services. If a man under the age of 26 refuses to register with Selective Service, WIOA Title I funded programs must be suspended until he registers. For transgender customers, compliance with selective service is predicated on the individual's gender as assigned at birth/as recorded on a birth certificate.

Documentation of Participant Eligibility

Documentation is necessary to support WIOA Title I youth eligibility. Staff must verify and confirm that youth are eligible to participate in WIOA youth services through an examination of documents which must be stored electronically by uploading the documents into the participant's file in Jobs4TN. Documentation must be available to program staff, fiscal monitors, and auditors for monitoring purposes. A case note may be added with the documentation indicating the eligibility requirement that the document is supporting. Records must be maintained for a period of at least five (5) years after the submittal of the final closeout expenditure report for that funding period by the Board's Fiscal Agent.

Determining School Status

To determine school status for youth participants, service provider staff must follow the below definitions provided in the Workforce Services Policy – Youth Eligibility:

School: Any secondary or postsecondary school as defined by the applicable State law or secondary and postsecondary institutions. For purposes of WIOA, the Department does not consider providers of adult education under WIOA Title II, YouthBuild programs, Job Corps program, high school equivalency programs, or dropout re-engagement programs to be schools. Youth attending high school equivalency programs funded by the public K-12 school system who are classified by the school system as still enrolled in school are an exception; they are considered in-school youth.

Attending School: An individual is considered to be attending school if the individual is enrolled in a secondary school or registered for credit-bearing courses at a postsecondary institution. Such schools and/or institutions include, but are not limited to: Tennessee Colleges of Applied Technology, community colleges, four (4) year college/university, traditional K-12 public and private, and alternative schools (e.g. continuation, magnet, charter, and home schools). AJC staff must evaluate the following at the time of enrollment:

- If the youth is enrolled in the WIOA youth program during the summer and is in between school years, the youth is considered in-school youth if they are enrolled to continue school in the fall.
- If a youth is enrolled in the youth program between high school graduation and postsecondary education, the youth is considered an in-school youth if they are registered for postsecondary credit-bearing courses, even if they have not yet begun postsecondary classes at the time of enrollment.
 - If the youth does not follow through with attending postsecondary education, then such a youth would be considered an out-of-school youth if the eligibility determination is made after the point that the youth decided not to attend postsecondary education.
- Postsecondary courses must be credit-bearing classes. An individual attending non-credit bearing, post-secondary classes (e.g. remedial courses) are to be considered out-of-school youth.

Not Attending School: An individual who is not attending a secondary or postsecondary institution.

Alternative School: A non-traditional academic program or school designed to meet the student's educational, behavioral, and social needs for students in grades seven (7) through twelve (12).

Determining Basic Skills Deficiency

An individual that has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test or is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society, is considered basic skills deficient. If an individual is found to be basic skills deficient, this must be recorded in Jobs4TN.

Testing for basic skills deficiency is recommended to be done through Tennessee Department of Adult Education when applicable. When testing through TN Department of Adult Education is not applicable, local providers are permitted to administer testing. Formalized testing instruments that are valid, reliable, appropriate, fair, cost effective, well-matched to the test administrator's qualifications, and easy to administer and interpret results must be used with approval of the Board. Assessment instruments must also be appropriate for the target population, and reasonable accommodations must be provided in the assessment process, if necessary, for individuals with disabilities.

Determining Low Income Status

WIOA Section 3(36)(A) defines a low income individual as someone who:

1. (i) receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the supplemental nutrition assistance program established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), the program of block grants to States for temporary assistance for needy families program under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), or the supplemental security income program established under title XVI of the Social Security Act (42 U.S.C. 1381 et seq.), or State or local income-based public assistance;
2. is in a family with total family income that does not exceed the higher of (I) the poverty line; or (II) 70 percent of the lower living standard income level;
3. is a homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))), or a homeless child or youth (as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)));
4. receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.);
5. is a foster child on behalf of whom State or local government payments are made; or
6. is an individual with a disability whose own income meets the income requirement of clause (ii), but who is a member of a family whose income does not meet this requirement.

Per WIOA section 129(a)(2), for the purpose of WIOA section 129(a)(1), the term “low-income”, used with respect to an individual, also includes a youth living in a high-poverty area. As stated in TEGl 21-16, the WIOA regulations at 20 CFR § 681.260 define high-poverty areas as a Census tract, a set of contiguous Census tracts, an American Indian Reservation, Oklahoma Tribal Statistical Area (as defined by the U.S. Census Bureau), Alaska Native Village Statistical Area or Alaska Native Regional Corporation Area, Native Hawaiian Homeland Area, or other tribal land as defined by the Secretary in guidance or county that has a poverty rate of at least 25 percent as set every 5 years using American Community Survey 5-Year data. As of the 2018 data (<https://www.census.gov/acs/www/data/data-tables-and-tools/data-profiles/>), Lake County is the only county in the Northwest area meeting the criteria to be a high poverty area. Below are the poverty rates (percentage of families and people whose income in the past 12 months is below the poverty level, all people)

Benton County, 21.40%	Dyer County, 18.50%	Lake County, 26.90%
Carroll County, 19.80%	Gibson County, 17.10%	Obion County, 22.70%
Crockett County, 19.30%	Henry County, 19.80%	Weakley County, 20.20%

WIOA Section 3(36)(B) defines lower living standard income level as that income level (adjusted for regional, metropolitan, urban, and rural differences and family size) determined annually by the Secretary of Labor based on the most recent lower living family budget issued by the Secretary.

Five-Percent Low-Income Eligibility Exception: As described in 20 CFR 681.250(c), WIOA allows a low-income exception where five (5) percent of WIOA youth may be participants who ordinarily would be required to be low-income for eligibility purposes and meet all other eligibility criteria for WIOA youth except the low-income criteria. A program must calculate the five (5) percent based on the percent of newly-enrolled youth in the Local Workforce Development Area's WIOA youth program in a given program year who would ordinarily be required to meet the low-income criteria. It is not based on all youth since many of the OSY categories do not require low-income status. Because not all OSY are required to be low-income, the five (5) percent low-income exception under WIOA is calculated based on the five (5) percent of youth enrolled in a given program year who would ordinarily be required to meet the low-income criteria.

Income Calculations: In order to determine if a youth applicant is in a family with total family income that does not exceed the higher of (I) the poverty line or (II) 70 percent of the lower living standard income level, actual total family income received by the applicant and all members of his / her family living in the household during the six-month period prior to the application date must be collected. All income earned and unearned income, unless specifically excluded per TEGL 19-16 or TEGL 21-16, is considered in determining monthly gross income. Income may be received periodically or at irregular intervals.

WIOA staff members must always obtain ample information to account for all income received during the six-month period prior to the application date, or information on how the family has been supported in the absence of income and / or public assistance (i.e. Food Stamps, Unemployment Insurance, etc.). When completing income computation, WIOA staff should use the following order for obtaining income documentation:

- (1) Actual Six Months of Income (e.g. six months of paystubs or employer statement)
- (2) Best Available Documentation (e.g. any available paystubs or Employment Security Wage Report)
- (3) Third Party Support

Method #1, actual six months of income, is always the best method and there should be very few cases in which six months of actual income is not used for income computation. If six months of actual income is not used for income computation, then staff must enter a very detailed case note justifying why method # 2 (Best Available Documentation such as any available paystubs or Employment Security Wage Report) is used and not method # 1. If method # 3 (Third Party Support) is used instead, staff must enter a very detailed case note justifying why method # 3 was used and not method # 1 or # 2.

Actual Income Verification: The Employment Verification Form for Eligibility, a statement from the employer of income between the application date and six months prior to the application date, or paystubs or other wage reports for the entire six-month period may be used to document actual income earned during the six-month period prior to the application date. The total gross income for the six-month period must be included in income computation, including any overtime, allowances, tips, or bonuses. All documents should have the person's name, the date(s) of the pay period, and the amount of income before deductions.

Best Available Documentation: If the income documentation provided does not reflect an accurate account of the income over the past six months (i.e. worked different jobs, had no income for a period of time, etc.), WIOA staff members should (a) call the applicant or parent/guardian to gather more income information to help determine eligibility (i.e. additional paystubs); (b) prorate year to date (YTD) amount from paystubs that include the entire six month pay period (see below for instructions on using YTD wages); (c) request wage information from Employment Security staff if available; or (d) obtain a Third Party Support Form. Ultimately, the responsibility is on the applicant/parent to supply adequate information to determine eligibility.

In the event that actual income verification for the past six months cannot be supplied by the applicant or employer, income documentation that includes at a minimum the most recent 30-days income (earned and unearned) for all family members in the household can be used may be used as an exception to compute income for the six-month period prior to the application date using prorated year-to-date (YTD) wages. The more income data available for the six-month time period, the better the documentation (multiple paystubs, although not consecutive for the entire period, may give a better picture). In order to use YTD information WIOA staff must determine the hire date and determine how many weeks of pay is represented by the YTD figure. The YTD amount should then be divided by the number of weeks represented, or the number between the first of the year or the hire date, whichever is more recent, and the end date of the most recent pay period as seen on the participant's paystub to identify an average weekly pay amount. The average weekly pay amount must then be multiplied by 26 weeks to determine the income amount for the six-month period prior to the application date. Any other income received during the six-month period by family members living in the household must also be included in the income computation.

Self-Employment: For self-employed individuals who have filed their taxes, the most recent tax return (not to be over 13 months old) of the self-employed individual is to be used to determine wages for the previous year. The amount in line will then be divided by 2 to determine the amount for the six-month period. The individual who is self-employed much also provide a signed attestation that nothing has occurred since the last income tax return period being supplied with the application that has or will significantly change the applicant's financial situation. Income of other family members of the household (if applicable) will also need to be documented and included in the income computation. For self-employed individuals who are not required to file taxes, a Personal Services Employment Verification Form may be used to document cash income (e.g. housecleaning, babysitting, dog-walking, etc.).

Other Means of Support: For families without includable income or public assistance, or those with gaps in income during the six months, information must be gathered to determine how the family supported themselves. A Third Party Support Form may be used to show how the applicant was supported. When using a Third Party Support Form, the person who is providing support to the applicant, who cannot be a family member as defined above, must list all the types of support provided to the applicant in a month on the form. Support received is not counted as income. Any income of family members living in the household must be included in income computation. If during gaps in employment a family member was relying on the income of other members of the family, staff must document this in the eligibility case note. The income of the family members must be included in income computation. If the family is being supported by exclusionary income, documentation must be obtained and a copy uploaded to the participant's file.

Determining Family Size: Income from individuals living in the household who do not meet the definition of "family" will not be included income computation. In the absence of a Federal and / or State definition, the Northwest Local Workforce Development Area has continued to use the definition of a family provided under the Workforce Investment Act and has considered family to mean two or more persons related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories:

- (A) A husband, wife, and dependent children.
- (B) A parent or guardian and dependent children.
- (C) A husband and wife.

Since parents are included in the definition of family, when an applicant lives in the same household as his/her parents, the income of the parents shall be included in determining low-income status and eligibility, unless:

- a) The applicant is a single parent/guardian, living with his / her parents, and is not claimed as a dependent on the most recent tax return of his / her parents (a copy must be maintained in the participant's file), whereby the applicant and his/her children comprise a separate family unit within the household; or
- b) The applicant is married but lives with parents, and is not claimed as a dependent on the most recent tax return of his / her parents, parents (a copy must be maintained in the participant's file) whereby the applicant and his/her spouse are considered a separate family unit within the household.

When an individual has a disability for which documentation can be obtained, the income for such individual shall exclude the income of any and all other members of the family. Acceptable documentation shall include a written statement from Vocational Rehabilitation reflecting current services, verification showing current receipt of SSI or SSD for the individual from the Social Security Administration, or a letter from a local education entity stating the individual has an IEP along with a signed attestation from the youth applicant and his/her parents/guardians, when applicable due to the applicant's age, that the IEP is based on a disability.

Needs Additional Assistance Definition

Each LWDB must define in its local plan and local policies the criterion of "requires additional assistance to complete an educational program, or to secure and hold employment" for OSY and ISY. LWDBs must include evidence supporting the established criteria ensure regional alignment to the best of their abilities, which may include most current labor market information, statistical evidence, and other data deemed supportive. Documentation required from participants to support established criteria must also be identified.

According to the Office of Disease Prevention and Health Promotion (ODPHP)'s [website](#), "Many factors can contribute to inequitable access to resources and opportunities, which may result in poverty. Marital status, education, social class, social status, income level, and geographic location (e.g., urban vs. rural) can influence a household's risk of living in poverty. For example, in 2012, 17.7% of people in rural areas were living in poverty, compared to 14.5% of people in urban areas. Racial and ethnic minorities are more likely than non-minority groups to experience poverty at some point in their lives. In addition, children from families that receive welfare assistance are 3 times more likely to use welfare benefits when they become adults than children from families who do not receive welfare. Studies also report that migrant status is a risk factor for poverty."

As mentioned above, as of 2018, the U.S. Census Bureau's American Community Survey 5-Year data showed poverty rates for the NW area between 17.1% and 26.9%. A rate of at least 20% is categorized by the U.S. Census Bureau as a poverty area, while 20 CFR § 681.260 defines a high poverty area as an area that has a poverty rate of at least 25%. Benton, Obion, and Weakley counties are considered poverty areas while Lake County is considered a high poverty area. The NW area also has median household incomes below the national average and significant percentages of children in poverty, female householders with no husband present, and non-family households. Although small, each county also has a presence of foreign-born individuals.

County Name	Median Household Income	% Children Under 18 Poverty Level	% Foreign-Born Population	% Male Householder, No Wife Present, Family Households	% Female Householder, No Husband Present, Family Households	% Non-Family Households
Benton	\$33,125	25.3%	1.1%	4.2%	11.4%	40.7%
Carroll	\$40,810	25.2%	0.9%	4.5%	12.7%	32.8%
Crockett	\$42,047	28.7%	4.2%	3.7%	12.7%	33.6%
Dyer	\$43,762	24.3%	1.9%	6.0%	15.3%	29.1%
Gibson	\$41,886	24.8%	1.2%	3.5%	15.9%	32.4%
Henry	\$40,837	30.9%	1.3%	3.4%	12.9%	31.8%
Lake	\$34,966	40.1%	0.7%	5.9%	20.9%	33.3%
Obion	\$39,866	33.2%	1.8%	5.2%	12.5%	32.9%
Weakley	\$38,566	25.6%	1.7%	5.3%	9.8%	36.2%

Source: Community Indicators Map, Economic Modeling Systems, Inc. (from the Census's American Community Survey 5-year estimates)

Furthermore, according to the Tennessee State Plan for 2020-2023, unemployment rates among youth (ages 16 to 24 years old) are higher in the West region at 18.45%, more than five times the overall state rate.

Based on the above labor market information, statistical evidence, Training and Employment Notice 22-19 - Technical Assistance Resources for the Workforce Innovation and Opportunity Act (WIOA) Youth Program, and other relevant experience in serving the youth population, the Northwest TN Workforce Board, in consultation with the Chief Local Elected Officials, has adopted the ~~below FDLWD~~ criterion for Youth- “requires additional assistance to enter or complete an educational program, or to secure or hold employment” in an effort to increase the likelihood of participants’ educational and occupational success, and reduce the likelihood of participants entering or remaining in poverty, as follows:

REQUIRES ADDITIONAL ASSISTANCE FOR BOTH OSY AND ISY:

1. Educational Barriers – as documented by school or testing agency records
 - a. Has been placed on probation, suspended, or expelled from school at least within the last 12 calendar months
 - b. Has repeated at least one secondary grade level
 - c. Has or has previously had below average grades or an ACT/SAT score below the college readiness range
2. Employment Barriers – as documented on the participant’s application
 - a. Little or no successful work experience or has never held a job
 - b. Has been fired from a job in the last 12 calendar months
 - c. Has a family history of chronic unemployment and / or long-term use of public assistance
 - d. Has experienced an unsuccessful work search or little to no exposure to successfully employed adults
 - e. Has, or is a member of a family who has, a poor work history, to include no work history, long-term unemployment, significant gaps in employment, or sporadic work history
3. Living Arrangements – as documented on the participant’s application, assessment, and / or case notes
 - a. Resides in a non-traditional household setting (i.e., single parent, lives with unofficial guardian, latchkey, grandparents, domestic partners, etc.)
 - b. Has been previously placed in out-of-home care (foster care, group home, or kinship care)
 - c. Lives in a home with parents who have limited English proficiency or the primary language spoken in the home is not English
 - d. Lives with only one or neither of his/her natural parents
 - e. Lives in public housing
 - f. Lives in a poverty area (poverty rate \geq 20%), federally-designated high poverty area (poverty rate \geq 25%), or an at-risk or distressed county per the Appalachian Regional Commission (ARC)
4. Medical/Social/Family Barriers – as documented on the participant’s application, assessment, and / or case notes
 - a. Lacks parental support
 - b. Has emotional, medical, physical, cognitive, or psychological impairment which creates a significant impediment to employment
 - c. Has been referred to, is being treated by, or has previously been treated by an agency for substance abuse
 - d. Has experienced recent traumatic events, is a victim of a crime or abuse, or resides in an abusive environment as documented by a school official or other professional
 - e. Faces significant personal challenges including dysfunctional domestic situations, lack of supportive services or transportation, documented behavioral problems, and substance abuse by the youth or a family member
 - f. Is, or is a member of household, receiving assistance to meet basic needs such as food and shelter
 - g. Has currently or formerly incarcerated parent(s) or guardians
 - h. Has parents who lack a high school diploma or equivalent

- i. Potential first-generation postsecondary student
- j. Emancipated youth
- k. Immigrant, refugee, or migrant youth

REQUIRES ADDITIONAL ASSISTANCE for Out-of-School Youth only – as documented by school records or the participant’s application:

- a. Has dropped out of postsecondary educational program ~~as documented by school records during the past calendar months; or~~
- b. Has not enrolled in postsecondary school or entered a career path within one year of completion of secondary school to include lack of full-time employment or history of employment with earnings below self-sufficiency guidelines
- c. Has never held a full-time job (aged 18+ only)
- d. Has been unemployed six months out of the last two years (aged 18+ only)
- e. ~~Has a poor work history, to include no work history or has been fired from a job in the last 6 calendar months; or~~
- f. ~~Has been suspended from school at least within the last 12 calendar months); or~~
- g. ~~Has below average grades; or~~
- h. ~~Has been previously placed in out-of-home care (foster care, group home, or kinship care) for more than 6 months between the ages of 16-24; or~~
- i. ~~Has currently incarcerated parent(s) or guardians~~

REQUIRES ADDITIONAL ASSISTANCE for In-School Youth only – as documented by school or court records:

- a. Has poor attendance patterns in an educational program during the last 12 months; ~~or~~
- b. Has documented behavioral problems at school
- c. Is deemed at risk of dropping out of school by a school official
- d. Has received court agency/referrals mandating school attendance
- e. Is required to enroll in remedial or development coursework in postsecondary
- f. Grade Point Average of less than 2.0 In school (secondary or postsecondary)
- g. One or more years behind modal grade for one’s age group
- h. ~~Has been expelled from school within the last 12 calendar months; or~~
- i. ~~Has been suspended from school at least within the last 12 calendar months; or~~
- j. ~~Has below average grades; or~~
- k. ~~Has been previously placed in out-of-home care (foster care, group home or kinship care) for more than 6 months between the ages of 14-21; or~~
- l. ~~Currently incarcerated parent(s) guardian~~

Five-Percent Additional Assistance Barrier Limitation for ISY: WIOA section 129(a)(3)(B)(1) states that in each LWDA, not more than five (5) percent of the ISY assisted may be eligible due to the barrier of requiring additional assistance to complete an educational program or to secure or hold employment. States and local areas must ensure that in a given program year, no more than five (5) percent of ISY enrolled in the program year are eligible only based on the “additional assistance” criterion. The five (5) percent limitation criterion for additional assistance applies to ISY only.

In order to ensure compliance with the five (5) percent ISY limitation and that ISY who are most in need are served in the WIOA youth program, the Northwest areas focuses on serving ISY who are eligible based on criteria other than the “requires additional assistance” criterion, such as homeless youth, foster youth, youth with a disability, and youth offenders. In addition, the service provider must request approval for any ISY enrollments using the needs additional assistance criterion so that the Board staff can track the number of newly-enrolled ISY in this category in a given program year.

Reference: WIOA section 129(a)(1)(B) and (C), WIOA Section 3(36)(A) and (B), WIOA section 129(a)(2), 20 CFR § 681.260, 20 CFR 681.250(c), WIOA Section 129(a)(3)(B)(1), WIOA Section 188(a)(5), TEGL 19-16, TEGL 21-16, ODPHP: <https://www.healthypeople.gov/2020/topics-objectives/topic/social-determinants-health/interventions-resources/poverty>

Related TDLWD Policy: Youth Eligibility Policy

Vetted and Approved by the Northwest Tennessee Workforce Board: August 25 ~~November 19, 2020~~ 2021

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

Youth Program Design and Incentives

Effective Date: ~~June 10, 2020~~ August 25, 2020

Duration: Indefinite

Purpose: To outline the required program framework for youth programs funded in whole or in part under Title I of WIOA and provide guidance for providing incentives for eligible Youth participants.

Policy: Funds allocated to a local area for eligible youth must include programs that provide assessments and develop service strategies linked to indicators of performance. The Youth program and service provision, under Title I of the Workforce Innovation and Opportunity Act (WIOA), is designed to:

- Assist eligible out-of-school youth (OSY) and eligible in-school youth (ISY), who are seeking assistance in achieving academic and employment success, with effective and comprehensive services and activities that include a variety of options for improving educational and skill competencies and provide an effective connection to educational institutions and employers, including small employers in in-demand industry sectors and occupations in the local and regional labor markets.
- Implement integrated strategies for career pathway approaches that support post-secondary education, training, and employment.
- Implement work-based training strategies and employment approaches to help participants develop essential skills that are best learned on the job.
- Implement progressive levels of education and training approaches that will help individuals with higher skill levels and experience earn marketable credentials.
- Provide continued support services to individuals who need them to participate and succeed in work investment and training activities.

Program Design

Program design is an essential element to assist youth service providers to develop comprehensive service strategies based upon an individual needs. Local Workforce Development Boards (LWDBs) must develop intensive outreach efforts to non-profits, community groups, faith-based agencies, schools, and other support agencies who can provide youth services. Access points must be developed in high school libraries with staff trained to assist youth in accessing all available services. Outreach programs must be implemented that will target populations with barriers to employment (including, but not limited to, offenders, homeless individuals, basic skills deficient, English language learners, individuals aging out of foster care, pregnant or parenting individuals, and persons with disabilities).

Service delivery will be based upon the following program components:

- Preparation for postsecondary educational opportunities;
- Occupational training services (that lead to the attainment of a recognized credential);
- Work-based opportunities;
- Youth development services; and
- Employment services

In order to support the attainment of a secondary school diploma or its recognized equivalent, or entry into postsecondary education and career readiness for participants, all youth programs shall provide services consisting of the required 14 Youth program elements as described in WIOA Section 123. Youth participants must be made aware of all available services, and the providing of the information must be documented in the participant's case file in Jobs4TN. When procuring a Youth service provider, the LWDB will follow all requirements as outlined in applicable Workforce Services policies, which shall include bidders providing a detailed outline of how the youth elements identified in the request for proposal (RFP) will be executed,

including any leveraging of community-based resources, such as partnerships with organizations that provide leadership development, mentoring services, and private sector employment involvement.

Per TEGL 21-16, as discussed in 20 CFR § 681.430, "individuals who meet the respective program eligibility requirements may participate in WIOA Title I Adult and Youth programs concurrently. Such individuals must be eligible under the Youth or Adult eligibility criteria applicable to the services received. Local program operators may determine, for these individuals, the best mix of services under the Youth and Adult programs." While some 18 to 24 year olds may be ready for Adult services due to life experiences such as having gained occupational skills through education or training, prior work experiences, adult schedules, family responsibilities, and the participant's needs, others need specific Youth services covered in the 14 WIOA Youth program elements based on characteristics such as maturity, drug and alcohol abuse, homelessness, foster care status, family abuse/neglect, literacy challenges, pregnancy, and lack of employability skills. Assessments of their skills, career-readiness, literacy, and supportive service needs should be taken into consideration when determining the appropriate program(s) for young adults.

Intake & Assessment

An orientation process must be provided to each potential eligible youth participant. Orientation must include information on the services that are available within the WIOA Title I youth program and the One-Stop Service Delivery system in the local area. These services may include, but are not limited to:

- Orientation/introduction of the program purpose
- All program services and resources available
- Responsibilities of other service providers
- Program participant's responsibility
- Information on follow-up services
- Information on support services
- Referral to other appropriate services

Intake involves registration, eligibility determination, and collection of documentation to support verification of eligibility for services. Other services also include referral for basic skills development and referral to other services as appropriate.

Assessment is a process that identifies service needs. An objective assessment must be administered to all eligible youth. The WIOA youth program design requires an objective assessment of academic levels, goals, interests, skills levels, abilities, aptitudes, and supportive service needs; it also measures barriers and strengths. Assessment results are used to develop the Individual Service Strategy (ISS). The results from the objective assessment must be entered into Jobs4TN.

Individual Service Strategy (ISS)

Based on the comprehensive intake and assessment process, Title I staff develop an Individual Service Strategy (ISS) with participants to identify their employment and / or educational goals and objectives, which must be specific, measurable, achievable, relevant, and timely (SMART), directly linked to one or more of the indicators of performance, and aligned to the interests and career pathway identified in the objective assessment. The ISS must also document the specific program elements and services to be provided to the participant based on the results of the objective assessment and the participant's SMART goals / objectives. A new service strategy for a participant is not required if the provider carrying out such a program determines it is appropriate to use a recent service strategy developed for the participant under another education training program.

Career Coaching & Case Management

Although not a specific element, Title I staff must provide case management services to assist a youth participant in making informed choices and completing the program. Case management typically includes non-instructional activities, such as navigation to and arrangements for academic, career or personal counseling, financial aid, childcare, housing, and other financial assistance that can be critical to the success and continued engagement of the individual in pursuing their career pathway component. Youth service providers must provide case management services to assist a youth participant in making informed choices and completing the

program. Support may be provided on an individual or group basis and career coaching principles and methods must be incorporated throughout the program.

Documentation of all services and activities must also be recorded in the participant's case file in Jobs4TN. Participants must be contacted at least monthly, and contacts must be documented in case notes in Jobs4TN. Recording case notes is critical because it weaves each service element into the comprehensive service plan. Case notes, at minimum, must reflect who was assisted, why, when and where the contact occurred and must be entered promptly with detailed information.

Supportive Services

Youth providers must provide supportive services to eligible youth participants that are necessary to enable an individual to participate in youth activities authorized under Title I of WIOA. The LWDB's Supportive Services policy outlines allowable support services and the procedures for administering and participants receiving supportive services.

Youth Incentives

Under WIOA, a much higher percentage of available local Youth funds must go toward OSY — 75% (versus 30% under WIA). Strategies for recruiting and serving more of these young people must be a focus more than ever before. While OSY who are not working, often referred to as “disconnected” or “opportunity” youth, may seek out opportunities to connect to training and work, according to MDRC's [*Serving Out-of-School Youth Under the Workforce Innovation and Opportunity Act \(2014\)*](#), “youth programs often report difficulties in sustaining participation after the initial connection is made. WIOA-funded service providers will not only have to reach more out-of-school youth, they will also need strategies to stimulate sustained, intense engagement in services.” According to the report, the presence of the following elements indicate that young people are more likely to engage:

1. Financial incentives and opportunities for paid training and work.
2. Opportunities to feel connected to caring adults and to a community.
3. Support services that address a young person's barriers to participant.

The report states “Incentives and stipends are a key form of positive reinforcement to sustain motivation, especially when tied to benchmarks such as earning academic credentials or acquiring specific competencies. They also can be an important source of support to meet the economic challenges these young people face.” 20 CFR § 681.640 and TEGL 21-16 indicate that incentive payments to youth participants are permitted as an allowed payment for recognition and achievement directly tied to work experience, education, and training. Incentive payments must be:

1. Tied to the goals of the specific program;
2. Outlined in writing before the commencement of the program that may provide incentive payments;
3. Align with the local program's organizational policies; and
4. Offered in accordance with the requirements contained in 2 CFR part 200. For example, Federal funds must not be spent on entertainment costs. Therefore, incentives must not include entertainment, such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment. Additionally, there are requirements related to internal controls to safeguard cash, which also apply to safeguarding of gift cards, which are essentially cash.

TEGL 21-16 also states that while the DOL recognizes that incentives could be used as motivators for various activities such as recruitment, submitting eligibility documentation, and participation in the program, incentives paid for with WIOA funds **must** be connected to recognition of achievement of milestones in the program tied to work experience, education, or training. Such incentives for achievement could include improvements marked by acquisition of a credential or other successful outcomes. Incentive payments may be provided to both ISY and OSY as long as they comply with the requirements of 20 CFR § 681.640.

To increase engagement among young people, provide positive reinforcement to sustain motivation, increase educational attainment and self-sufficient employment, and help support participants in facing economic challenges, the following incentives will be offered to Youth participants:

Work Experience Incentives	Amount
Successful completion of the first 2 weeks of paid work experience	\$50
Successful completion of the first 4 weeks of paid work experience	\$100

Additionally, for Youth participants who are / have been participating in work experience who are in need of a high school equivalency diploma, the following incentives will also be offered:

Attending 4 HiSet classes after orientation totaling 12 class hours	\$100
Completion of the HiSET voucher	\$150
Completion of the HiSET	\$250

For OSY work experience participants, the following incentive will also be offered:

Transitioning into postsecondary during participation or within 2 quarters after exit	\$50
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Credential Attainment Incentives	Amount
Attainment of a credential during participation or within 1 year after exit	\$100

As part of the Work Ready Community (WRC) initiative, which seeks designation as a regional economy with a pool of qualified workers, area residents must achieve the necessary levels on the ACT assessment to be granted a National Career Readiness Certificate (NCRC). By achieving an NCRC, participants are able to demonstrate their employability skills to potential employers who may prefer or require the assessment for entry into a position. Youth participants who may benefit from earning an NCRC, as determined through the assessment process, may earn the following incentive:

Attainment of a National Career Readiness Certificate (NCRC)	\$25
Improved NCRC Certificate Level	\$25

Note: Participants may only receive an improved NCRC certificate incentive payment if there is a documented need for a higher NCRC level (e.g. a position requires a higher level, the participant is seeking to enter into training for an occupation that typically requires a higher level, etc.).

Placement in Postsecondary / Employment Incentives	Amount
Placement in regular part-time or full-time employment for each quarter after exit OR	\$100 / Qrt (\$400 total)
For individuals originally enrolled as ISY in secondary school or OSY for non-occupational skills training or related services, placement in postsecondary training program for each quarter after exit	\$100 / Qrt (\$400 total)

Note: Participants can only earn one of the two placement incentives per quarter and cannot exceed \$400 total for four quarters. For instance, a participant who is both employed and enrolled in postsecondary training during a quarter after exit may only receive one \$100 incentive payment for that quarter. Participants can receive a combination of employment and postsecondary placement incentives throughout the four quarters. For instance, a participant may earn a postsecondary placement incentive for the first two quarters, and an employment incentive for the last two quarters.

Supporting documentation is required for payment of these incentives and must be uploaded into VOS. Supporting documentation may include pay stubs, postsecondary acceptance letter/schedule, transcripts, diploma, Ged/HiSet, High school diploma, postsecondary credential, certificate, or copy of licensure, and/or ACT NCRC scores. Incentive payments to participants must be issued in the form of check or direct deposit, in order to ensure proper internal controls in accordance with 2 CFR part 200, and recorded properly in VOS. At the request of the Career Service Provider, an alternate payment system may be approved by the Executive Director, in consultation with the Board Chair, if proper internal controls have been established and can ensure

safeguarding of incentive payments. Availability of incentives is contingent upon funding levels, and this policy may be suspended by the Executive Director, with approval of the Board Chair, to accommodate decreases in funding.

Common Exit

A common exit occurs when a participant enrolled in multiple partner programs, to include Title I, Title III, Trade Adjustment Act / Trade and Globalization Adjustment Act, and Jobs for Veterans State Grants, has not received services from any of the applicable programs in which the participant is enrolled for at least 90 days, and no future services are planned. In accordance with Workforce Services Policy – Common Exit from WIOA Partner Programs, in order for staff to properly and timely exit participants, they are required to follow up with participants every 30 days. A detailed description of contact and contact attempts must be documented in case notes, included the intention of the contact. In the event the participant is unable to be reached, staff should do a follow-up contact every five days from the date of the missed contact until contact is made. If staff is unable to reach the participant on the second contact attempt via phone or primary method, then he / she should make every effort to use alternative contact methods (i.e. social media, Facebook, alternative contacts, email, etc.), not to exceed 90 days. If after all contact attempts during the 90-day period the staff is unable to reach the participant, he/she should close all open activities and create a closure with the appropriate closure reason.

Follow-Up Services

Follow-up services are critical services, provided for no less than 12 months, following a youth participant's exit from the program. These services help ensure the youth is successful in employment and/or postsecondary education and training beyond their program completion. The youth service provider must establish and implement procedures to ensure that follow-up services are conducted and documented in Jobs4TN in accordance with the below guidelines:

1. At the time of enrollment, youth must be informed that follow-up services will be provided for 12 months following exit.
2. If at any point in time during the program or during the 12 months following exit the youth requests to opt-out of follow-up services, they may do so. In this case, the request to opt-out or discontinue follow-up services made by the youth must be documented in case notes.
3. Follow-up services must include more than only a contact attempted or made for securing documentation to report a performance outcome.
4. In the event a participant cannot be located or contacted, attempts to contact the participant must be documented in case notes, including the intent of the attempted contact.

Allowable follow-up activities also include:

1. Supportive Services
2. Adult Mentoring
3. Financial Literacy Education
4. Services that provide Labor Market Information
5. Activities that help youth prepare for and transition to postsecondary education and training

Reference: TEN 22-19; 20 CFR § 681.640; TEGL 21-16; WIOA sec. 129(c)(1)(B) and 123; MDRC's [*Serving Out-of-School Youth Under the Workforce Innovation and Opportunity Act \(2014\)*](#) by Farhana Hossain; 2 CFR part 200.

Related TDLWD Policy: Youth Program Service Design, [Common Exit from WIOA Partner Programs](#)

Vetted and Approved by the Northwest Tennessee Workforce Board: August 25 ~~June 10~~, 2020

Jimmy Williamson, Chair
Northwest Tennessee Workforce Board



STATE OF TENNESSEE
DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT
DIVISION OF WORKFORCE SERVICES
220 French Landing Drive
Nashville, TN 37243
(615) 741-1031

MEMORANDUM

TO: Local Workforce Development Boards

FROM: Kenyatta Lovett *KL*
Assistant Commissioner
Division of Workforce Services

DATE: July 13, 2020

Tennessee has many initiatives that are supporting individuals in their pursuit of secondary and postsecondary education, in order to propel themselves and their families to self-sufficiency and increased social mobility. Tennessee's workforce initiative Drive-to-55 is designed to achieve a goal of 55 percent of adults in Tennessee with a postsecondary degree or credential by the year 2025. The initiative has increased the higher education enrollments and demands all agencies to answer the call for support. Tennessee Promise, one initiative under Drive-to-55, offers high school graduates two years of tuition-free education for community or technical college. Tennessee Pathways is the K-12 initiative under Drive-to-55 and supports alignment among K-12, postsecondary, and industry to provide students with relevant education and training to jumpstart their postsecondary journey.

In order to effectively support the many initiatives of TN, the state's workforce development board (SWDB) needed increased flexibility to design and deliver workforce services that would allow the SWDB to serve its constituents effectively through the Tennessee Workforce System. To help achieve this goal, the SWDB applied for two waiver requests for the youth population under the Workforce Innovation and Opportunity Act (WIOA) Title I youth program.

It is with great pleasure that we inform you that the requested waivers were approved.

Requested Waiver: Waiver associated with the requirement at WIOA Section 129(a)(4)(A) and 20 CFR 681.410 that the State and local areas expend 75 percent of Governor's reserve youth funds and local formula youth funds on out-of-school youth (OSY).

Employment & Training Administration (ETA Response): ETA approves for Program Years (PYs) 2019 and 2020, which includes the entire time period for which states are authorized to spend program year (PY) 19 and 20 funds, the State's request to waive the requirement that the State expend 75 percent of Governor's reserve youth funds on OSY. TN may lower the expenditure requirement of Governor's reserve to 50 percent for OSY.

In addition, ETA approves for PYs 2019 and 2020, which includes the entire time period for which states are authorized to spend PY 19 and 20 funds, the State's request to waive the requirement that local areas expend 75 percent of local youth formula funds on OSY. TN may lower the local youth funds expenditure requirement to 50 percent for OSY. As a result of this waiver, ETA expects that the number of in-school youth (ISY) served will increase and performance accountability outcomes for overall WIOA Youth (including both ISY and OSY) will remain steady or increase for the majority of the WIOA Youth performance indicators.

Requested Waiver: Waiver of 20 CFR 681.550 to allow WIOA individual training accounts (ITAs) for ISY.

ETA Response: ETA approves, through June 30, 2022, the State's request to waive the requirement limiting ITAs to only OSY, ages 16-24. In addition to these OSY, the State may use ITAs for ISY, ages 16-21. Approval of this waiver should not impede the State's efforts to prioritize OSY, including outreach to the OSY population.

To summarize, effective immediately, LWDBs will expend 35 to 50 percent of PY20 local funding on ISY and not less than 50 percent on OSY. LWDBs will also issue, as applicable, ITAs to participants that classify as ISY at enrollment aged 16-21 utilizing PY19 and PY20 local funding.

Please send all correspondences to workforce.board@tn.gov.

KL:JL