

\*\*Please sign your name in chat box to confirm attendance.

#### **Quarterly Board Meeting**

November 10, 2020 Click here for Zoom link

**11:30** a.m. to **1:00** p.m. **Tel:** +16465588656 412604

#### **AGENDA**

Call Meeting to OrderJohn ZoblApproval of MinutesJohn ZoblRecognition of Board Members & MayorsMarla Rye

**Meet the New Providers** 

EDSI Christina Dusenberry Metropolitan Action Commission Dr. Cynthia Croom

#### **Strategic Priorities:**

Manage Board funds to support Career Pathways
 Financial Report
 Ginger Fussell

**▶** Connect People with Career Opportunities:

One-Stop-Operator Report George Phillips
COVID-19 Response to Individuals Andrea Dillard

**▶** Train Workforce to Fill Employer Needs:

Business Services-Apprenticeships Freda Herndon COVID-19 Response to Business Needs Andrea Dillard

► Improve Efficiency & Effectiveness of Training Programs
New WIOA Policies

Renee Hollis

#### **Old Business:**

Workforce StudyCampbell Strong Workforce PartnershipMarla RyeJohn Watz

Adjourn: John Zobl

#### **Upcoming Meetings:**



February 10, 2021 May 12, 2021 August 11, 2021 November 10, 2021



#### DRAFT UNTIL APPROVED

## Northern Middle TN Workforce Board Meeting August 12, 2020 11:30 a.m. to 1:30 p.m.

#### Present Members: Members Absent: Guest and Staff:

Bo Callis Tylesha McCray Seth Thurman Jennifer Hobbs Lynn Seifert Richie Brandon Chris West Tony Adams Carol Puryear James Harper Dan Caldwell GC Hixson Kristi Spurgeon John Zobl Howard Bradley Mark Peed

Bo Callis

John Alexander

Keith Carnahan Charles Story Jon Hunter David Rutledge Dan Ryan

Krystle Cain Rob Tudor Mayor McCarver Mayor Wallace Mayor Holt Kendrick Curtis Ginger Fussell Marla Rye Erin Lilly Renee Hollis Andrea Dillard Freda Herndon John Watz Meagan Dobbins George Phillips Barbara Unruh Ginger Hausser Joseph Johnson Dr. Rubin Cockrell Jimmy Johnston Pamela Sieffert Ellen Gomez Mark Stiles Rupa DeLoach Barrett Smith Ginger Fussell

The Northern Middle Tennessee Workforce Development Board met virtually on Wednesday August 12, 2020 at 11:30 a.m.

The meeting was called to order and Chairman John Zobl made opening remarks. Marla welcomed everyone to the meeting. John Zobl asked for a motion to approve the minutes. Seth Thurman made the motion to approve. Howard Bradley seconded and the vote was unanimous. Marla welcomed the new board members, Jennifer Hobbs, Lynn Seifert, Richie Brandon, Tony Adams, and James Harper. She thanked Mayors Anthony Holt, Jesse Wallace, and Kerry McCarver for attending the meeting in support of the board. Marla stated that the Mayors met on June 30 and signed the Interlocal Agreement and created the new paperwork that is necessary for the new program year. Mayor Holt was elected chief local elected official.

#### **Election of Officers:**

Marla asked Anthony Holt (CLEO) to serve as the facilitator for the election of officers. Anthony started by thanking Chairman John Zobl, vice chair Charles Story, and secretary Kristi Spurgeon for their hard work and dedication to the board. Mayor Holt opened the floor for nominations from the board members. Howard Bradley nominated John Zobl for chair. Anthony asked if anyone had any other nominations. GC Hixson seconded the nomination of John Zobl. With no opposition, the vote was passed unanimously. John Zobl recommended that we reappoint Charles Story as the vice chair and Kristi Spurgeon as the secretary. GC motioned and Carol Puryear seconded. The vote passed unanimously.

#### **Workforce Study:**

John Zobl asked Rupa to give an update on the Workforce Study and the projected completion date. Rupa presented a PowerPoint on the status of the study. Rupa explained the study began in October of 2019, and they were getting ready to begin reviewing and editing in March when COVID-19 happened. She stated they had to reassess the data post COVID-19 and see how it effected workforce development. They are in the review and edit phase now. They are currently updating data to be the most current and doing an internal review of data sets. Rupa stated the study is expected to be complete by September. John Zobl stated he read through the presentation and was very impressed by the level of detail in the report. Rupa explained that she wants to continue to inform the board about shifts in the data even after the study is complete to help the workforce area with updated data sets.

#### **Manage Board funds to support Career Pathways:**

Ginger gave a recap on the prior fiscal year. She stated that we utilized 79% of the grant funding that were earmarked available for the prior fiscal year. Workforce Board expenses are at 95.1%. The One Stop Operator contract was one that had been running high, and with monitoring, came in under budget. Ginger stated we appreciate Mid Cumberland for paying attention to our concerns and keeping the OSO line item in budget. The CSP utilized 82% of their initial contract budget. Throughout the year we increased the budget as additional funding became available. They spent 68.4% of the modified budget number. We had identified that funding for participant enrollments finished at 58.9%. Campbell Strong Project is a two year grant to serve soldiers and spouses. With three months remaining on this project we are at 90.8% enrollment. However, there is a sizable amount of funding available still on the budget. We have requested a no cost extension from the state and are waiting on approval.

Ginger updated the board about the \$15 million budget that was approved at the last meeting. \$1.1 million is made up of a National Dislocated Worker Grant. We have revised funds available for this upcoming year of \$16.1 million. The six month extension to Mid Cumberland has included guidance on goals, and expectations. Ginger gave a monitoring update for our sub recipients. We monitor quarterly and the areas of concern this quarter were discussed with Mid Cumberland. The first concern was staff turnover and how it is contributing to performance concerns. Ginger did note a positive from this quarter all reports were on time and gave credit to timely invoicing from our contractors and timely processing by Workforce Essentials. Ginger also mentioned that Mid Cumberland showed commitment to the quarterly monitoring's and had their key management team at all meetings.

Ginger explained the upcoming procurement timeline. She stated the executive committee voted to approve procuring a third party administrator to be used for the procurement process. Marla stated the

target is to have new contracts awarded by November and for them to be effective beginning January 1. Ginger stated we need acceptance of the financial report and budget revision for the additional \$1.1 million. John Zobl asked for a motion to approve the finical budget that Ginger presented. Chris West motioned and Seth Thurman seconded. The vote was passed unanimously.

#### **Connect People with Career Opportunities:**

Andrea Dillard updated the board on the National Emergency Grant. She stated that in the past the Northern Middle area has received these types of grants to deal with disasters such as tornados and floods. We received gap funding back in April to get an early start on this process. The existing contract runs from July 1, 2020 to June 30, 2022 in the amount of \$983,000. In order to be eligible you must qualify as a dislocated worker. It is for individuals who lost their job due to the pandemic. Andrea stated that we reached out to local school systems, county mayors, and city mayors to try to identify worksites where there is a need for COVID recovery efforts. We currently have worksites in all of our 13 counties in our workforce area.

George Phillips presented the dashboard with updates on the local area. He explained the 3 step reopening phases that took place at the 13 AJCs. He included the unemployment rate as of June. George stated that the Northern Middle AJCs were open before any other workforce areas in the state. He presented some of the safety protocols that each of the centers are following to stop the spread of COVID-19. PPE was provided including disposable mask, gloves, disinfectant, hand-sanitizers and even disposable gowns for wiping down heavy traffic areas. He noted that all visitors are screened before being allowed to enter the AJCs. He presented the key performance indicators for the quarter and stated that COVID has greatly affected these numbers.

#### **Train Workforce to Fill Employer Needs:**

Freda Herndon presented the updated Rapid Response report for Northern Middle through July 31<sup>st</sup>. These companies have notified the state that they are having a layoff or permanent closure. Freda explained the Apprenticeship report stating that we have allocated almost all the funds from last year.

Renee presented the updated ETPL policy which aligns with state guidance. Renee requested approval for this new policy. Joh Zobl asked for a motion. Seth Thurman motioned and Tony Adams seconded. With no discussion, the vote passed unanimously.

#### **Improve Efficiency & Effectiveness of Training Programs:**

John Watz explained that every three years all the AJCs have to be recertified. He stated that during the month of July a team inspected all 14 centers to make sure they complied with the states policy and had ADA accommodations. John mentioned they updated signage in the Rutherford and Wilson County offices. He said the Northern Middle committee has approved all centers. He stated the recertification paperwork has been submitted to the state for review.

#### **Old Business:**

Marla Rye concluded the meeting by confirming future meeting dates. With no other business, Chairman Zobl adjourned the meeting.





#### Meet our new Service Providers:

#### **EDSI**

EDSI (Educational Data Systems, Inc.) is a national workforce development, talent solutions and consulting company with a passion for helping great companies and communities train and retain great people. EDSI works with regions, employers and jobseekers to overcome their most challenging obstacles. Founded in 1979 and headquartered in Dearborn, Michigan, the company employs more than 800 people across the country. EDSI is a National Best and Brightest® Companies To Work For award winner.

For over 40 years, EDSI has worked with workforce development agencies, regional partners and employers to assess and understand workforce development needs and deliver solutions to build better workforces. The company operates more than 70 contracts providing successful business services and jobseeker placement and retention services across the country.

EDSI's consulting team specializes in providing organizations with support in 3 critical areas: Attracting, Training, and Retaining top talent. EDSI helps organizations develop and implement "better, faster, smarter" people and business strategies.

#### MAC

The Metropolitan Action Commission (MAC) partners with families in poverty using a Whole Family/2Gen Approach. This approach meets the needs of both the child and the adult in their lives building a system of care around the entire family. Our programs and services break the cycle of poverty by addressing the root causes by increasing family economic security, educational success, and health and well-being from one generation to the next.

MAC was created by ordinance on August 12, 1964, for the purpose of securing and expending federal grants in accordance with regulations regarding the eradication of poverty. The original funding for the Metropolitan Action Commission was from the Great Society programs that began during the Lyndon Johnson Presidency. The Metropolitan Action Commission (MAC) was created and has been the designated Community Action Agency for Nashville and Davidson County since 1964 to help indigent individuals and families improve the quality of their lives by advocating the needs of the poor.

The MAC is governed by a Board of Commissioners composed of representatives from public, private, and community sectors. The Board of Commissioners oversees every aspect of the program and financial operations of the agency.



## Manage Board Funds to Support Career Pathways

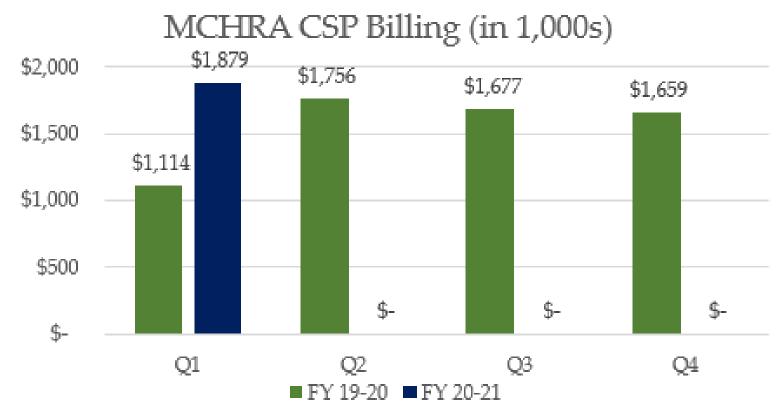
#### **EXECUTIVE SUMMARY**

#### 2020-2021 Quarter 1

Northern Middle LWDA	Q1 Expenses	12 Mo. Budget	
All Northern Middle Expenditures	\$ 3,442,786	\$ 15,169,826	22.7%
Workforce Board	Q1 Expenses	12 Mo. Budget	
Workforce Board Expenditures	297,453	1,265,645	23.5%
MCHRA One-Stop Operator (OSO)	Q1 Expenses	6 Mo. Budget	
OSO '20 (Six Month Extension)	40,505	221,168	18.3%
MCHRA Career Service Provider (CSP)	Q1 Expenses	6 Mo. Budget	
CSP '20 (Six Month Extension)	1,879,219	4,450,000	42.2%
MCHRA Enrollments	Q1 Actual	Goals	
Participant Enrollments '20 (Six Months)	557	1,074	51.9%
Participant Enrollments '20 (Quarter 1 Goal)	557	665	83.8%

#### NORTHERN MIDDLE TN WORKFORCE BOARD SEPTEMBER 2020 FISCAL UPDATE EXECUTIVE SUMMARY - MCHRA Update

MCHRA expenditures were the highest in September of any month since the beginning of the contract at \$828k. Despite lower billings in July and August of \$500 to \$552k, September's strength resulted in the highest quarterly billing since the beginning of the contract at \$1.879M.



#### **EXECUTIVE SUMMARY - MCHRA Update**

MCHRA indicated improvement in September regarding MPCR performance with significant increases in each fund stream, particularly dislocated worker. AJC re-openings, as well as expiring COVID-related unemployment assistance impacted enrollments. MCHRA enrollments were 182 in July, 224 in August and 151 in September. Higher enrollments in July and August were followed by increased direct participant expenditures in September.

	# Funds			
	Streams with			
FY20-21	MPCR > 55%	Adult	DW	Youth
Jul	0	36%	45%	41%
Aug	0	47%	49%	38%
Sep	3	58%	71%	55%
FY20-21		49%	59%	46%

#### **EXECUTIVE SUMMARY**

#### CAMPBELL STRONG 2-YEAR PROJECT RECAP

## End of initial 24 month project (1-year, no-cost extension to 9/30/2021 granted)

Campbell Strong Project	Expenses	Budget	
Campbell Strong - Current fiscal year	849,125	3,343,629	25.4%
Campbell Strong Expenditures - Project-to-Date	5,255,545	\$ 7,750,048	67.8%

Direct Participant Expenses	Expenses	Budget	
Campbell Strong - Current fiscal year	490,147	1,685,331	29.1%
Campbell Strong Expenditures - Project-to-Date	2,804,816	4,000,000	70.1%

Campbell Strong Enrollments	Actual	Goal	
Participant Enrollments	1,398	1,440	97.1%

Enrollment goals for October 1, 2020 through September 30, 2021 will be 560

#### **EXECUTIVE SUMMARY**

Minimum Participant Cost Rate (MPCR) - Preliminary Through September 2020

Without

**Campbell Strong** 

or Disaster Relief

Grants

MPCR = 45.76%

	MCHRA Adult MCHRA & Dislocated		Campbell Strong	Disaster	ther (WE ior CSP &		
		Youth	Worker	excluded	Relief	IFA)	Total
Qualifying Expenses	\$	264,302	\$ 688,331			\$ -	\$ 952,633
Total Program	\$	574,652	\$ 1,282,726			\$ 224,265	\$ 2,081,642
MPCR		45.99%	53.66%			0.00%	45.76%

Northern Middle is in compliance with the 40% Requirement.

## NORTHERN MIDDLE TN WORKFORCE BOARD SEPTEMBER 2020 FISCAL UPDATE EXECUTIVE SUMMARY

Minimum Participant Cost Rate (MPCR) - Preliminary Through September 2020

Including
Campbell Strong
and Disaster
Relief Grants

MPCR = 54.41%

			M	CHRA Adult			Other (WE					
	ı	MCHRA	HRA & Dislocated		ted Campbell		I	Disaster		Prior CSP &		
		Youth		Worker		Strong		Relief		IFA)	Total	
Qualifying Expenses	\$	264,302	\$	688,331	\$	490,147	\$	276,926	\$	-	\$	1,719,706
Total Program	\$	574,652	\$	1,282,726	\$	\$ 780,434		298,349	\$	224,265	\$	3,160,425
MPCR		45.99%		53.66%		62.80%		92.82%		0.00%		54.41%

## NORTHERN MIDDLE TN WORKFORCE BOARD SEPTEMBER 2020 FISCAL UPDATE MONITORING UPDATE

Northern Middle continues to monitor sub-recipients and provide technical assistance on an ongoing basis. Quarterly monitoring reports are submitted to Tennessee Department of Labor Program Integrity unit. A new state monitoring policy draft lists eight reporting elements. Northern Middle is aligning report format to address these eight elements.

#### Mid-Cumberland HRA

- \* MCHRA staff have provided written action plans to address Northern Middle's comments per monthly fiscal and programmatic desk reviews. Several areas showed improvement particularly in the month of September.
- \* Northern Middle credentialing measure for Dislocated Worker may be challenging into the future due to MCHRA performance trends.
- \* Northern Middle and MCHRA staff held two meetings regarding field tracking of direct participant payments and obligations to ensure that enrollments and funding maintain appropriate pace.

#### Campbell Strong - Workforce Essentials/West Ky Workforce Board

\* Low total expenditures resulted in remaining funds at the end of the two year contract period. A twelve month no-cost extension with increased enrollment goals was granted.



# Connect People with Career Opportunities

## Northern Middle Tennessee **Workforce Development Board AJC Report**

For July 1 to September 30, 2020

Report Date: November 10, 2020

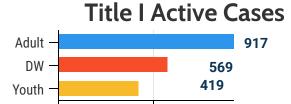
#### **Local Area Updates**

The quarter ending September 30 is the first quarter of the year that our Northern Middle American Job Centers (AJCs) have operated at full capacity. The pandemic hit just two prior to the end of the first quarter of the calendar year. Half of the second quarter, we were operating with a skeleton crew. The staff returned to re-open on May 11, but we did not return to operating at full-capacity until June 8. Leaving us with only three weeks remaining in the quarter.

For the quarter ending September 30, enrollments are up, AJC traffic is up and spending for jobskills training is up. Our AJCs are filled with customers, not only filing for unemployment benefits, but conducting job-searches; as well as seeking out all of the many services offered by our American Job Centers.

45.76% Contractual **MPCR** (Including OSO Costs, 7.1.20 to 9.30.20)

#### **Partner Program Updates**



500

#### **Adult Education**

A total of **43** students received their HiSETs with an average of 631 students enrolled in classes! This quarter, **35** students received a level gain.

#### **Wagner Peyser**

7,350

New employers registered in Jobs4TN

5,679

New Job Orders in Jobs4TN

359

Wagner Peyser Participants

#### Vocational Rehabilitation

1,308

191

86

45

**Active Cases** 

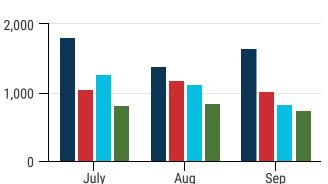
**Applications** 

**Currently Working** 

Successful Closures

#### **AJC Total Traffic Counts**

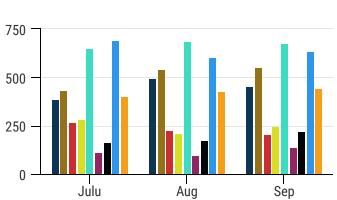




Comprehensives

Navy - Davidson **Red - Montgomery** Med. Blue - Rutherford **Green - Sumner** 

#### **Total Individual Visitors** 32.679



**Affiliates** 

Navy - Cheatham Gold - Dickson **Red - Houston** 

**Teal - Robertson Purple - Stewart** Black - Trousdale Yellow - Humphreys Med. Blue - Williamson Orange - Wilson





#### Northern Middle AJC Report July 1, 2020 - September 30, 2020

#### Unemployment Rates by County as of September 2020;

**State = 6.3%** 

County	Unemployment Rate (June)	Unemployment Rate (September)
Cheatham	(7.8%)	4.6%
Davidson	(12.1%)	7.5%
Dickson	(7.6%)	4.4%
Houston	(9.3%)	6.0%
Humphreys	(7.4%)	4.6%
Montgomery	(10.0%)	6.2%
Robertson	(8.8%)	4.8%
Rutherford	(10.6)	5.4%
Stewart	(7.4)	4.5%
Sumner	(9.3%)	5.3%
Trousdale	(8.1%)	5.2%
Williamson	(6.7%)	3.6%
Wilson	(9.3%)	5.3%

In the spring, our Northern Middle counties saw their respective unemployment rates quadruple due to the pandemic in the course of only a few weeks. By April, all of our counties had double-digit unemployment rates, one as high as 16.7%, while the state was at 15.0%.

By June, our unemployment rates had dropped significantly and were much lower than the state's rate of 10%.

That drop has continued throughout the summer and into the fall. The state now has an overall unemployment rate of 6.3% as of September; while Northern Middle has an average rate of 5.2% across our thirteen counties. The highest unemployment rate is in Davidson County, with a rate of 7.5%, while the lowest is in Williamson County at 3.6%. This is a significant improvement from where things stood in the spring, and the efforts in our American Job Centers played a big part in this turn-around.

#### **Virtual Job Fairs**

The pandemic has created the need for Virtual Job Fairs. In September, the Northern Middle Board purchased a platform that makes job fairs very accessible for employers and job-seekers, including resume submissions, live chats and even video interviews, all from the safety of a computer. It functions like a regular job fair, with individual company booths and a "lobby". We have used it many times already with great feedback, from both employers and job-seekers.



#### **Key Performance Indicators (KPI)**

Beginning January 1, 2020; the Statewide Workforce Development Board (SWDB) established Key Performance Indicators for each major program under WIOA. Targets were reviewed with each Local Area in February. All AJC partners are to be included in the KPIs for 2020, including Title I, Adult Ed, Wagner-Peyser, Voc-Rehab, TANF, SCSEP & NCOA, RESEA, TAA, SNAP E&T among others. The Northern Middle Title I targets for 2020 are listed below, along with the actual data from Calendar Year Q1, Q2 and Q3 2020. Performance obviously suffered greatly when the AJCs were shut down and were not fully operational until almost mid-June. Now that they are fully operational again, performance has improved significantly.

	Calendar Year	Northern Middle Target	Actual
	Q1 2020	507	238
Adult and	Q2 2020	338	165
Dislocated	Q3 2020	507	455
Worker	Q4 2020	339	
	2020	1,691	858
	Q1 2020	185	92
	Q2 2020	123	67
Youth	Q3 2020	185	144
	Q4 2020	123	
	2020	616	303























## TAKE ADVANTAGE OF FREE SHORT-TERM TRAINING AND BE READY FOR A NEW CAREER IN THE NEW YEAR

We know new skills can make a difference in your career path. We also understand that COVID-19 has resulted in job loss, reduced hours, and constant change. With funds provided by through Tennessee CARES and the Tennessee Department of Labor and Workforce Development, we have partnered with Training Providers to offer "New Skills November" at no cost to you.



#### **LOCATIONS**

Nashville, Clarksville, Waverly, Dickson, Erin, Ashland City, Murfreesboro, Gallatin, and Lebanon.



#### **CLASSES**

Basic computer training, Construction, CNA, Fiber Optics, CDL Truck Driving, and more.



#### **ENROLLMENT**

To enroll in one of the trainings visit: https://nm-wb.com/new-skills-november













School	Date	Training	Class	Time	Capacity	City	Location	Register:
Nashville State Community College	11/2/2020	Computer Training	Microsoft Word	8:00 am - 4:00 pm	Up to 12 students	Nashville	Nashville White Bridge Road Room #C- 221	https://www.nm-wb.com/new-skills-november
Nashville State Community College	11/04/2020	Computer Training	Microsoft Excel	8:00 am - 4:00 pm	Up to 12 students	Nashville	Nashville White Bridge Road Room #C- 221	https://www.nm-wb.com/new-skills-november
Nashville State Community College	11/05/2020	Computer Training	Microsoft PowerPoint	8:00 am - 4:00 pm	Up to 12 students	Nashville	Nashville White Bridge Road Room #C- 226	https://www.nm-wb.com/new-skills-november
Nashville State Community College	11/06/2020	Computer Training	Microsoft Outlook	8:00 am - 4:00 pm	Up to 12 students	Nashville	Nashville White Bridge Road Room #C- 226	https://www.nm-wb.com/new-skills-november
				8:00 am - 4:00 pm	Up to 12	Clarksville	Clarkerilla Carania	
Nashville State Community College	11/09/2020	Computer Training	Microsoft Word	0.00 din 4.00 pin	students	ClarkSville	Clarksville Campus Wilma Rudolph Blvd. Room #109	https://www.nm-wb.com/new-skills-november
Nashville State Community College	11/10/2020	Computer Training	Microsoft Excel	8:00 am - 4:00 pm	Up to 12 students	Clarksville	Clarksville Campus Wilma Rudolph Blvd. Room #109	https://www.nm-wb.com/new-skills-november
Nashville State Community College	11/12/2020	Computer Training	Microsoft PowerPoint	8:00 am - 4:00 pm	Up to 12 students	Clarksville	Clarksville Campus Wilma Rudolph Blvd. Room #109	https://www.nm-wb.com/new-skills-november
Nashville State Community College	11/13/2020	Computer Training	Microsoft Outlook	8:00 am - 4:00 pm	Up to 12 students	Clarksville	Clarksville Campus Wilma Rudolph Blvd. Room #109	https://www.nm-wb.com/new-skills-november
Nashville State Community College	11/30/2020	Computer Training	Microsoft Word	8:00 am - 2:00 pm	Up to 11 students	Waverly	Waverly Campus Holly Lane Room #102	https://www.nm-wb.com/new-skills-november
Nashville State Community College	12/01/2020	Computer Training	Microsoft Excel	8:00 am - 2:00 pm	Up to 11 students	Waverly	Waverly Campus Holly Lane Room #102	https://www.nm-wb.com/new-skills-november
Nashville State Community College	12/02/2020	Computer Training	Microsoft PowerPoint	8:00 am - 2:00 pm	Up to 11 students	Waverly	Waverly Campus Holly Lane Room #102	https://www.nm-wb.com/new-skills-november
Nashville State Community College	12/03/2020	Computer Training	Microsoft Outlook	8:00 am - 2:00 pm	Up to 11 students	Waverly	Waverly Campus Holly Lane Room #102	https://www.nm-wb.com/new-skills-november
Nashville State Community College	12/04/2020	Computer Training	Word/Excel/ PPT/ Outlook Q&A	8:00 am – 12:00 pm	Up to 11 students	Waverly	Waverly Campus Holly Lane Room #102	https://www.nm-wb.com/new-skills-november
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Nashville State Community College	11/05/2020	Soft Skill Training	Communication & Listening	9:00 am - 12:00 pm	Up to 15 students	Nashville	Nashville White Bridge Road Room #S- 116	https://www.nm-wb.com/new-skills-november
Nashville State Community College	11/5/2020	Soft Skill Training	Personal Productivity	1:00 pm - 4:00 pm	Up to 15 students	Nashville	Nashville White Bridge Road Room #S- 116	https://www.nm-wb.com/new-skills-november
Nashville State Community College	11/12/2020	Soft Skill Training	Diversity & Differences	9:00 am - 12:00 pm	Up to 15 students	Nashville	Nashville White Bridge Road Room #S- 116	https://www.nm-wb.com/new-skills-november

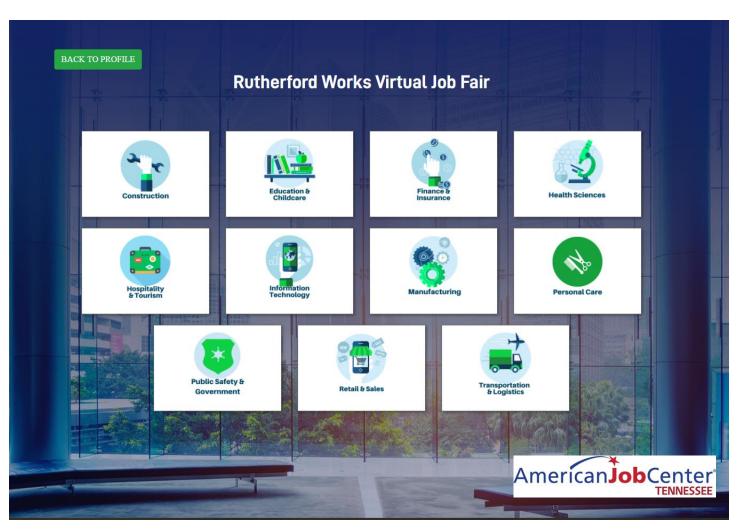
School	Date	Training	Class	Time	Capacity	City	Location	Register:
Nashville State Community College	11/12/2020	Soft Skill Training	Building Trust	1:00 pm - 4:00 pm	Up to 15 students	Nashville	Nashville White Bridge Road Room #S- 116	https://www.nm-wb.com/new-skills-november
Nashville State Community College	11/19/2020	Soft Skill Training	Motivating Employees	9:00 am – 12:00 pm	Up to 15 students	Nashville	Nashville White Bridge Road Room #S- 116	https://www.nm-wb.com/new-skills-november
Nashville State Community College	11/19/2020	Soft Skill Training	Managing Performance	1:00 pm - 4:00 pm	Up to 15 students	Nashville	Nashville White Bridge Road Room #S- 116	https://www.nm-wb.com/new-skills-november
Nashville State Community College	11/18/2020	Hospitality	ServSafe	8:00 am - 4:30 pm	Up to 10 students	Nashville	Nashville Southeast Campus Hickory Hollow Pkwy Room #1463	https://www.nm-wb.com/new-skills-november
Nashville State Community College	12/02/2020	Hospitality	ServSafe	8:00 am - 4:30 pm	Up to 10 students	Nashville	Nashville Southeast Campus Hickory Hollow Pkwy Room #1463	https://www.nm-wb.com/new-skills-november
Nashville State Community College	11/09 -20/2020	Manufacturing Training	Industrial Readiness	8:00 am - 3:30 pm	Full	Clarksville	Clarksville Campus Wilma Rudolph Blvd. Modular Classrooms	https://www.nm-wb.com/new-skills-november
Nashville State Community College	11/30/2020 – 12/11/2020	Manufacturing Training	Industrial Readiness	8:00 am - 3:30 pm	Up to 14 students	Clarksville	Clarksville Campus Wilma Rudolph Blvd. Modular Classrooms	https://www.nm-wb.com/new-skills-november
T 0 " (								
Tennessee College of Applied Technology Dickson	Saturday, November 14 Saturday, November 21 Saturday, December 5	Computer Training	Microsoft Word, Excel, PowerPoint,	8:00 am – 4:30 pm	10	Erin	American Job Center 155 W. Front Street Erin, TN 37061	https://www.nm-wb.com/new-skills-november
Tennessee College of Applied Technology Dickson	Saturday, November 14 Saturday, November 21 Saturday, December 5	Computer Training	Microsoft Word, Excel, PowerPoint,	8:00 am – 4:30 pm	10	Ashland City	American Job Center 384 South Main Street Ashland City, TN 37015	https://www.nm-wb.com/new-skills-november
Tennessee College of Applied Technology Dickson	Saturday, November 14 Saturday, November 21 Saturday, December 5	Project Management	Project Management	8:00 am – 4:30 pm	10	Dickson	740 TN-46 Dickson, TN 37055	https://www.nm-wb.com/new-skills-november
Tennessee College of Applied Technology Clarksville	Saturday, November 14 Saturday, November 21 Saturday, December 5	Project Management	Project Management	8:00 am – 4:30 pm	10	Clarksville	135 International Blvd. Clarksville, TN 37040	https://www.nm-wb.com/new-skills-november
Tennessee College of Applied Technology Murfreesboro	Tuesday, November 9 ( 9 Week Course)	Construction Training	Basic Safety, Construction Math, Drawings, etc.	Tues. Wed. Thurs. 5:00 p.m9:00 pm	10	Murfreesboro	Old Fort Parkway Murfreesboro, TN	https://www.nm-wb.com/new-skills-november
Tennessee College of Applied Technology Murfreesboro	Tuesday, November 9 ( 9 Week Course)	Certified Nursing Assistant	Patient Care C.N.A. Certification	Tues. Wed. Thurs. 5:00 p.m9:00 pm	15	Murfreesboro	Old Fort Parkway Murfreesboro, TN	https://www.nm-wb.com/new-skills-november
Tennessee College of Applied Technology Murfreesboro	16-Nov	Certified Nursing Assistant	Patient Care C.N.A. Certification	Tues. Wed. Thurs. 5:00 p.m9:00 pm	15	Murfreesboro	Old Fort Parkway Murfreesboro, TN	
Tennessee College of Applied Technology Murfreesboro		Basic Computer Skills	Microsoft Suite			Murfreesboro	Old Fort Parkway Murfreesboro, TN	Jail Class?
	_	_						
Volunteer State Community College	November 5- 6, 2020	Certified Fiber Optics	Specialist/Testing	8:00 am - 5:00 pm	Expired	Gallatin	1480 Nashville Pike Gallatin, TN	https://www.nm-wb.com/new-skills-november

School	Date	Training	Class	Time	Capacity	City	Location	Register:
Volunteer State Community College	November 7-8, 2020	Certified Fiber Optics	Splicing	8:00 am - 5:00 pm	10	Gallatin	1480 Nashville Pike Gallatin, TN	https://www.nm-wb.com/new-skills-november
Volunteer State Community College	November 2-4, 2020	Certified Fiber Optics	Technician	8:00 am - 5:00 pm	Expired	Gallatin	1480 Nashville Pike Gallatin, TN	https://www.nm-wb.com/new-skills-november
Austin Peay State University Armored Trucking	November 2, 2020	Truck Driver Training	CDL	8:00 am-5:00 p.m M- F (4 weeks)	8	Clarksville	APSU McReynolds Bldg. Room 203	https://www.nm-wb.com/new-skills-november
Austin Peay State University Armored Trucking	30-Nov-20	Truck Driver Training	CDL	8:00 am-5:00 p.m M- F (4 weeks)	Full (Wait List)	Clarksville	APSU McReynolds Bldg. Room 203	https://www.nm-wb.com/new-skills-november
Lockhart Trucking Academy	November 9, 2020	Truck Driver Training	CDL	8:00 am-5:00 p.m M- F (4 weeks)	Full (Wait List)	Lebanon	606 Briskin Lane Lebanon, TN	https://www.nm-wb.com/new-skills-november
Lockhart Trucking Academy	16-Nov-20	Truck Driver Training	CDL	8:00 am-5:00 p.m M- F (4 weeks)	Full (Wait List)	Lebanon	606 Briskin Lane Lebanon, TN	https://www.nm-wb.com/new-skills-november
Quiltss	9-Nov-20	Patient Care	Apprenticeship		Full (Wait List)	Franklin		

#### **Premier Virtual**











Virtual Job Fair December 2 9 am - 1 pm REGISTER TODAY!









#### **Manufacturing Day 2020! Northern Middle Tennessee Opportunity Showcase**













Raising awareness of career pathways open to students from high school, college and beyond.

Thanks to the local manufacturers joining today!



# Train Workforce to Fill Employers Needs

Tennessee Department of Labor and Workforce Development
<b>CARES ACT Funds for Employer Training: \$350,000</b>

County	Employer	<b>Training Type</b>	<b>Amount Requested</b>		Projected Award	
Davidson	Berry Global	OJT	\$	25,000.00	\$	25,000.00
Davidson	Clear Link	IWT	\$	25,000.00	\$	25,000.00
Davidson	Empower Electric	IWT	\$	125,000.00	\$	77,849.42
Montgomery	Clarksville Dental	IWT	\$	14,741.60	\$	14,741.60
Montgomery	LG Electronics	IWT	\$	25,000.00	\$	25,000.00
Montgomery	Clarksville Montgomery County Schools	IWT	\$	141,853.24	\$	86,000.00
Robertson	Robertson County Schools	IWT	\$	8,815.98	\$	8,815.98
Rutherford	Interstate Warehousing	OJT	\$	25,000.00	\$	25,000.00
Rutherford	Rutherford Works	IWT	\$	4,018.00	\$	4,018.00
Wilson	Compaction Tool Service	IWT	\$	12,036.00	\$	12,036.00
Wilson	Jones Bros Contractors	IWT	\$	21,539.00	\$	21,539.00
Wilson	Solaren	IWT	\$	25,000.00	\$	25,000.00
		TOTAL	\$	453,003.82	\$	350,000.00

United Way of Greater Nashville						
<b>CARES ACT Funds for Small Businesses (Layoff Aversion):</b>	\$370,000					

			Í	
County	Small Business Employer	Training Type	Amount Requested	Projected Award
Davidson	Parson Cleaning Service	SBA	\$ 752.00	\$ -
Davidson	Nannies of Brentwood	SBA	\$ 10,000.00	\$ -
Davidson	Assist TN Services	SBA	\$ 10,000.00	
Davidson	Excel Facility Management Group	SBA	\$ 10,000.00	\$ 10,000.00
Davidson	The Starnes Group	SBA	\$ 795.89	\$ 795.89
Davidson	Travellers Rest Historic House Museum	SBA	\$ 1,470.10	\$ 3,167.61
Davidson	Bellevue Harpeth Chamber of Commerce	SBA	\$ 1,920.00	\$ 1,920.00
Davidson	Holmes Pest Control	SBA	\$ 10,000.00	
Davidson	Relevant Resources Group	SBA	\$ 3,000.00	

Davidson	M&P Services	SBA	\$ 6,743.33	\$ 6,699.31
Davidson	Ruffin Consulting	SBA	\$ 10,000.00	
Davidson	GSH Media & Consulting	SBA	\$ 9,370.17	
Davidson	CorBrook, LLC	SBA	\$ 10,000.00	
Davidson	Elegant Enterprise LLC	SBA	\$ 4,911.37	\$ 4,911.37
Davidson	U-Kno Catering	SBA	\$ 287.00	
Dickson	The Roxy Theater - Dickson	SBA	\$ 10,686.63	\$ 10,000.00
Dickson	R&F Communications	SBA	\$ 6,210.93	\$ 6,210.93
Dickson	Tartam dba Subway - White Bluff	SBA	\$ 2,458.66	\$ 2,458.66
Houston	The Original Floodzone	SBA	\$ 3,045.26	\$ 3,045.26
Houston	Cleghern's Grocery Inc	SBA	\$ 3,540.21	\$ 3,540.21
Houston	Markley P Runyon, Attorney	SBA	\$ 5,437.41	\$ 5,437.41
Humphreys	Flexer Theaters	SBA	\$ 2,193.99	\$ 2,193.99
Humphreys	Hukam dba Subway - Waverly	SBA	\$ 1,215.65	\$ 1,215.65
Humphreys	Tru-Fit Products	SBA	\$ 10,000.00	\$ 10,000.00
Humphreys	Waverly Café	SBA	\$ 2,498.58	\$ 2,498.58
Humphreys	Memories & Marmalade	SBA	\$ 10,000.00	\$ 1,500.00
Humphreys	Allied Hose & Belting	SBA	\$ 10,000.00	
Humphreys	Mathias Metal Systems	SBA	\$ 10,000.00	\$ 10,000.00
Humphreys	Nisbat Inc dba Subway 39655	SBA	\$ 1,849.83	\$ 1,849.83
Montgomery	Gianesin, LLC (Caprigio's Pizza)	SBA	\$ 10,000.00	\$ 2,280.81
Montgomery	AO Cellphone Repair & Sales	SBA	\$ 7,000.00	\$ -
Montgomery	Marvin's Army Gaming	SBA	\$ 10,000.00	\$ -
Montgomery	SHE Gifts of Life, LLC	SBA	\$ 10,000.00	\$ -
Montgomery	LIFFE (Living in Faith & Fitness Everyday)	SBA	\$ 5,700.00	\$ 5,700.00
Montgomery	Vipdout	SBA	\$ 3,800.00	\$ 3,800.00
Montgomery	Linda Love Insurance Service	SBA	\$ 7,027.00	\$ 5,000.00
Montgomery	Juice & Rootz	SBA	\$ 10,000.00	\$ 5,000.00
Montgomery	Ms. Pete's Catering Corp	SBA	\$ 5,595.00	\$ 2,705.90
Montgomery	Protected Insurance Group	SBA	\$ 2,812.66	\$ 2,812.66
Montgomery	Williams Growth Station	SBA	\$ 10,000.00	\$ 5,000.00
Montgomery	Encompass Financial Services	SBA	\$ 10,000.00	\$ 10,000.00
Montgomery	Legion Restorations Inc	SBA	\$ 8,321.00	

Montgomery	Power and Grace Preparatory Academy	SBA	\$ 10,000.00	\$ 10,000.00
Montgomery	FerrariStampi	SBA	\$ 10,000.00	\$ 10,000.00
Montgomery	Riverside Shoe Repair	SBA	\$ 1,322.96	\$ 1,322.96
Montgomery	C&C Gutters	SBA	\$ 10,000.00	\$ 10,000.00
Montgomery	Smithfield Manufacturing	SBA	\$ 10,000.00	\$ 10,000.00
Montgomery	Shooters Gun Emporium	SBA	\$ 10,000.00	\$ 10,000.00
Montgomery	Skye Publishing dba Estate Gardens & Maintenance	SBA	\$ 9,964.00	
Montgomery	Tailwater Marine & Tackle	SBA	\$ 5,294.96	
Montgomery	The Goines Agency, LLC	SBA	\$ 10,000.00	
Montgomery	Cut Masters Lawn Service Inc.	SBA	\$ 10,000.00	
Montgomery	Cunningham Spirits LLC dba Old Glory Distilling Co	SBA	\$ 10,682.95	\$ 10,000.00
Montgomery	Kids Stuff & More CDC LLC	SBA	\$ 2,797.63	\$ 2,797.63
Montgomery	The Youth Academy LLC	SBA	\$ 8,635.38	\$ 8,635.38
Montgomery	Forestry Management Services	SBA	\$ 10,000.00	
Montgomery	Lyle Cook Martin Architects	SBA	\$ 10,000.00	
Robertson	B&B Machine Company	SBA	\$ 9,841.44	\$ 9,841.44
Robertson	Beth Null Dorris - State Farm	SBA	\$ 3,137.75	\$ 3,137.75
Robertson	Prime Time Auto Care and Mobile Detailing	SBA	\$ 10,000.00	\$ -
Robertson	Green Street HVAC	SBA	\$ 3,231.44	\$ 3,231.44
Robertson	Wilkinson Insurance	SBA	\$ 6,329.53	\$ 6,631.35
Robertson	Dorris Milling Co	SBA	\$ 2,371.62	\$ 2,562.62
Robertson	Aluminum Racing Products Inc	SBA	\$ 10,000.00	\$ 10,000.00
Robertson	Highland Rim Speedway	SBA	\$ 10,000.00	\$ 10,000.00
Rutherford	L&W Profection Services	SBA	\$ 10,000.00	\$ 3,655.00
Rutherford	Design Works Nashville	SBA	\$ 10,000.00	\$ 3,770.00
Rutherford	The Walk-In Closet LLC	SBA	\$ 9,612.00	\$ 6,981.62
Rutherford	Bambini Village Montessori	SBA	\$ 10,000.00	\$ 10,000.00
Rutherford	Allvan USA, LLC	SBA	\$ 9,717.00	\$ 10,000.00
Rutherford	Rutherford County Area Habitat for Humanity	SBA	\$ 10,097.00	\$ 10,000.00
Rutherford	Dominion Financial Management	SBA	\$ 3,281.47	\$ 3,281.47
Stewart	Beecham Enterprises Co dba Mama Mea's	SBA	\$ 7,181.75	\$ 7,181.75
Sumner	Primrose School of Hendersonville	SBA	\$ 10,000.00	
Sumner	Dale's Cleaning Service	SBA	\$ 7,405.05	

Wilson	Wilson County Business & Education Coalition	SBA <b>Total</b>	\$ 2,982.60 <b>566,957.85</b>	\$ 2,982.60 <b>320,485.73</b>
Wilson	Lebanon Wilson County Chamber of Commerce	SBA	\$ 6,763.75	\$ 6,763.75
Wilson	MA Professional Business Services	SBA	\$ 6,692.00	\$ 6,692.00
Wilson	Fitness Tennessee LLC	SBA	\$ 9,700.00	\$ -
Trousdale	Iris Plastics LLC	SBA	\$ 1,272.90	\$ 1,272.90



# Improve Efficiency & Effectiveness of Training Programs



November 10, 2020

#### **Executive Summary**

#### **Credential Attainment Guidance**

- 1. What is the general purpose of this guidance?

  This is new guidance to address credential attainment definitions and how to report and collect credential attainment documentation.
- 2. What are the notable guidelines conveyed within this policy? Defines the types of recognized postsecondary credentials.



Effective Date: 11.10.2020

**Duration: Indefinite** 

#### **Credential Attainment Guidance**

#### **Purpose**

To provide the Career Service Provider (CSP) with credential attainment definitions and guidance for reporting and collecting credential attainment documentation from program participants.

#### **Background**

Section 116 of WIOA establishes performance accountability indicators and performance reporting requirements to assess the effectiveness of States and local areas in achieving positive outcomes for individuals served. TEGL 10-16, Change 1, elaborates on the performance accountability requirements in section 116 of WIOA.

#### **Definitions**

Credential Attainment Performance Measure is the percentage of participants enrolled in an education or training program (excluding those in on-the-job training and customized training) who attain a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program.

**Recognized postsecondary credential** is defined as a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal government, or an associate or baccalaureate degree.

#### Examples of a recognized post-secondary credential:

- Associate degree
- Bachelor's degree
- Technical certificate or diploma (e.g. certificate or diploma issued by a TCAT)
- License recognized by state or federal government (e.g. Registered Nurse, Licensed Practical Nurse, etc.)
- Certificate of completion of an apprenticeship
- An industry recognized certificate or certification (e.g. Microsoft Information Technology certificate, Certified Nursing Assistant, etc.)

#### Examples of what does not count as a recognized post-secondary credential:

- Continuing Education Units (CEUs)
- Work readiness certificates (e.g. completion of soft skills training)
- General skill certificates related to safety or hygiene (e.g. CPR, OSHA)
- General computer skills (e.g. basic computer skills training)

#### Instructions

WIOA supports both credentialed and non-credential instruction. WIOA intends to connect participants with the appropriate training and skills to obtain sustainable employment. While ensuring participants are attaining recognized credentials is important, the critical focus should be on ensuring each participant receives the best possible services and support to obtain lasting employment and optimal earnings.

TEGL 10-16, Change 1, further defines the types of acceptable credentials to include: other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment.

Under this guidance the Northern Middle Workforce Board will recognize the following as postsecondary credentials when issued by an institution of higher education if the individual also obtains employment in the industry associated with the training they received:

- Information Technology training that results in a certificate of completion and leads to employment in the IT industry (e.g. Project Management Professional)
- Healthcare training that results in a certificate of completion and does not require a license in the State of TN to obtain employment in that field (e.g. Phlebotomy, Medical Assistant, Medical Billing & Coding)

WIOA Section 116, TEGL 10-16, Change 1, TEN 25-19	
Authorized by:	Approved by:

Marla Rye, Executive Director Date John Zobl, Chairman Date



November 10, 2020

#### **Executive Summary**

#### **Youth Eligibility Policy**

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

The Youth Eligibility policy outlines eligibility requirements for the youth program, identifies the criteria for basic skills deficient, explains the five (5) percent exception provisions, and identifies the criteria for determining if a participant requires additional assistance to enter or complete an educational program or to secure and hold employment.

#### 2. What are the modifications to this policy?

WIOA requires that either the SWDB or the LWDB establish a policy for the "requires additional assistance" criterion. Previously the SWDB had defined the "requires additional assistance" criterion. On September 15, 2020, the TDLWD issued a memorandum now requiring that the LWDB define the "requires additional assistance" criterion for In-School Youth (ISY) and Out-of-School Youth (OSY) eligibility.



Effective Date: 10.01.2018 Revised Date: 11.10.2020

Duration: Indefinite

#### Youth Eligibility Policy

#### **Purpose**

This policy provides 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 and educational program, or to secure or hold employment."

#### Background

WIOA outlines a broad youth vision that supports an integrated service delivery system and a commitment to providing high-quality services for youth, including career exploration and guidance, continued support for educational attainment, opportunities for skills training such as pre-apprenticeships or internships for indemand industries and occupations, enrollment in postsecondary education, or a Registered Apprenticeship.

#### Policy & Instructions

Youth must meet eligibility requirements. WIOA establishes separate eligibility criteria for out-of-school youth (OSY) and in-school youth (ISY).

#### 1. Out-of-school Youth is defined as:

- A. Not attending any school at the time of enrollment:
- B. Not younger than 16 or older than 24 at the time of enrollment (participants may continue to receive services beyond the age of 24 once they are enrolled in the program (20 CFR 681.210); and
- C. Meets one or more of the following conditions:
  - School dropout
  - Within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. School year calendar is based on how a local school district defines its school year quarters.
  - Recipient of a secondary school diploma or its recognized equivalent who is low-income and basic skills deficient or an English language learner
  - An offender who has been subject to any stage of the criminal justice process
  - A homeless individual, aged 16 to 24 who meets the criteria defined in Violence Against Women Act of 1994 Section 41403(6), a homeless child or youth aged 16 to 24 who meets the criteria defined in the McKinney Vento Homeless Assistance Act Section 725(2), or who is a runaway
  - An individual in foster care, or who has aged out of the foster care system, or who has attained 16 years of age and left foster care of kinship, guardianship, or adoption, a child eligible for assistance under Social Security Act, or in an out-of-home placement;
  - Pregnant or parenting;
  - An individual with a disability;
  - Low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

#### 2. In-school Youth is defined as:

- A. Attending school at the time of enrollment;
- B. Not younger than 14 or older than 21 (unless an individual with a disability who is attending school under State law) at the time of enrollment (participants may continue to receive services beyond the age of 24 once they are enrolled in the program 20 CFR 681.220);
- C. Low-income; and
- D. Meets one or more of the following conditions:
  - Basic skills deficient;
  - An English language learner;
  - An offender who has been subject to any stage of the criminal justice process
  - A homeless individual, aged 14 to 21 who meets the criteria defined in Violence Against Women Act of 1994, a homeless child or youth aged 14 to 21 who meets the criteria defined in the McKinney Vento Homeless Assistance Act, or who is a runaway
  - An individual in foster care, or who has aged out of the foster care system, or who has attained 16 years of age and left foster care of kinship, guardianship, or adoption, a child eligible for assistance under Social Security Act, or in an out-of-home placement;
  - Pregnant or parenting;
  - An individual with a disability;
  - Requires additional assistance to complete an educational program or to secure or hold employment.

Note: Youth with disabilities who have an Individualized Education Account may be enrolled as ISY after the age of 21 but no older than 22.

#### US Citizenship or Authorization to Work in the United States

Eligible youth must also be a citizen or national of the United States, lawfully admitted permanent resident alien, refugee, asylee, and parole, and other immigrant authorized by the Attorney General to work in the United States (WIOA Section 188(a)(5)).

#### Selective Service Registration Requirement for Males Under Age 26

Before enrollment in WIOA Title I funded services, all males who are not registered with Selective Service and have not reached their 26th birthday must register through the Selective Service website at www.sss.gov.

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 for Participant Eligibility**

Documentation is required to support WIOA Title I youth eligibility (see Attachment I Youth Eligibility Criteria and Documentation). Local Workforce Development Boards must conduct program oversight and monitoring of the career service provider and local youth workforce investment activities as outlined in WIOA Section 107(d)(8). Documentation will 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 requirements that the document is supporting.

#### **Determining School Status**

To determine school status for youth participants, service provider staff must follow the definitions below.

School - Any secondary or postsecondary school as defined by the applicable State law (TCA 49-6-301, 49-6-401, and 49-7-2003) for secondary and postsecondary institutions. For purposes of WIOA, the Department does not consider providers of adult education under Title II of WIOA, Youth Build programs, the 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, 4-year college/university, traditional K-12 public and private, and alternative (e.g., continuation, magnet, charter, and home) schools. Service provider 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.
  - o If the youth does not follow through with attending post-secondary 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.
- Post-secondary 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.

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 service providers are permitted to administer testing. Formalized testing instruments that are valid, reliable, appropriate, fair, cost effective, and easy to administer and interpret results must be sued with approval of the Board. Assessment instruments must be appropriate for the target population, and provide reasonable accommodation in the assessment process, if necessary, for individuals with disabilities.

If the individual is found to be basic skills deficient, this must be recorded in the State management information system.

#### Term of the Individualized Education Account

For in-school youth and purposes of continuity of educational attainment, a student who enrolls in the program shall remain eligible until the participating student meets one of the following, whichever occurs first:

- A. The student enrolls full-time in a public school in the local education agency in which the parent or student who has attained the age of majority resides
- B. The student graduates from high school. The student may continue in the program until such time as he or she receives a high school diploma, or receives a passing score on all subtests of the HISET
- C. The student reaches twenty-two (22) years of age. The student may complete the school year in which he or she reaches the age of twenty-two (22), provided a student shall not be enrolled in the program past August 15 of the next school year after they have reached twenty-two (22).

### **Determining Low-Income Status**

A low-income individual is someone who:

- A. 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 (SNAP), the supplemental security income program established under Title XVI or the Social Security Act, or State or local income-based public assistance
- B. Is in a family with total income that does not exceed the higher of:
  - The poverty line, or
  - 70 percent (70%) of the lower living standard income level. (For additional guidance, see Low Income Guidelines policy)
- C. A homeless individual
- D. Receives or is eligible to receive free or reduced price lunch
- E. A foster child on behalf of whom State or local government payments are made
- F. An individual with a disability whose own income meets the low-income level for eligibility purposes
- G. Youth who reside in a high poverty area

### Five (5) Percent Low-Income Eligibility Exception

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 for the low-income criteria. A program must calculate the five (5) percent based on the percent of newly enrolled youth in the local 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 not ordinarily be required to meet the low-income criteria.

## Determining Additional Assistance for OSY and ISY Criteria

The following criteria are used to determine if a youth meets the definition of requiring additional assistance.

## A. Requiring Additional Assistance for OSY only

- 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
- Is required to enroll in remedial or developmental coursework in postsecondary
- Has dropped out of a postsecondary educational program as documented by school records

- Has never held a full-time job (30+ hours per week) for more than 13 consecutive weeks (age 18 or older only)
- Has been referred to, is being treated by, or has previously been treated by an agency for substance abuse

#### B. Requiring Additional Assistance for ISY only

- Has poor attendance patterns, including truancy and chronic absenteeism, in an educational program during the last 12 calendar months;
- Has been expelled from school within the last 12 calendar months;
- Has been suspended from school within the last 12 calendar months;
- Has a grade point average of less than 2.0;
- Is deemed at risk of dropping out of school by a school official
- Is required to enroll in remedial or developmental coursework in postsecondary

Note: All items must be documented by school records

# Five (5) Percent Additional Assistance Barrier Limitation for ISY

WIOA states that each local area must ensure, no more than five (5) percent of ISY enrolled in the program year are eligible only based on the "needs additional assistance" criterion. The five (5) percent limitation criterion for additional assistance applies to ISY only.

WIOA Section 129(a), 20 CFR 681.23	0-250, TEGL 21-16		
Authorized by:		Approved by:	
Marla Rye, Executive Director	Date Date	John Zobl, Chairman	Date

References



November 10, 2020

# **Executive Summary**

# **Monitoring & Oversight Policy**

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

  To establish the NMTWB's engagement in monitoring and oversight activities and define the process for monitoring sub-recipients.
- 2. What are the modifications to this policy?

  Defines the monitoring and oversight responsibilities by staff and function. Also describes the appeals process in order to meet TDLWD WFS Monitoring Policy.



Effective Date: 10.01.2018 Revised Date: 11.10.2020 Duration: Indefinite

## **Monitoring and Oversight Policy**

### **Purpose**

The purpose of this policy is to establish the process for monitoring sub-recipients and the engagement of the Northern Middle Tennessee Workforce Board (NMTWB) in monitoring and oversight activities.

### **Background**

As outlined in WIOA Section 107(d)(8), local workforce development boards are required to conduct monitoring and oversight of all sub-recipients. The NMTWB must:

- Conduct oversight for local employment and training activities for adults and dislocated workers, youth workforce investment activities, and the One Stop delivery system;
- Ensure the appropriate use and management of funds provided for these activities; and
- Ensure appropriate use, management, and investment of funds to maximize performance outcomes under WIOA Section 116

#### **Policy & Instructions**

Monitoring is an ongoing process and the joint responsibility of quality assurance, fiscal, and other administrative staff.

The NMTWB will conduct at a minimum, quarterly oversight and monitoring of its WIOA programs and contractors in order to:

- Determine that expenditures have been made against the proper cost categories and within the cost limitations, specified within WIOA and the regulations;
- Determine whether there is programmatic compliance with WIOA, including additional applicable laws and regulations;
- Assure compliance with 2 CFR 200 (e.g. 2 CFR 200.34, Expenditures; 2 CFR 200.84, Questioned Cost; and 2 CFR 200.85, Real Property); and
- Determine compliance with the nondiscrimination, disability, and equal employment opportunity requirements of WIOA Section 188.

#### A. Monitoring Process

- 1. NMTWB staff will conduct monitoring and program reviews in accordance with Federal Uniform Guidance and the Tennessee Department of Labor and Workforce Development (TDLWD) Monitoring Policy and Monitoring Guide as amended.
- 2. Monitoring will be conducted at a minimum of quarterly by the appropriate NMTWB staff.
- 3. The monitoring review will utilize a combination of methods to include desk reviews, report reviews, analytical analysis, inquiries, testing and observations. The review may include: examining program records, questions to employees, interviewing participants, and entering any site or premise which receives WIOA funds. Participant files may be reviewed through a random sampling.

Monitoring Policy 1 | P a g e

- 4. Detailed reports will be compiled by NMTWB staff including observations, areas of concern, findings, recommendations, and a time frame for corrective action. Reports will be distributed to the sub-recipient and made available to NMTWB, TDLWD, monitors or auditors upon request. All responses and corrective actions must be completed within 30 business days from the date the report was issued.
- 5. NMTWB staff will review the responses and corrective action plan and either accept or deny the plan. Technical assistance will be provided at a minimum of quarterly to ensure compliance with all WIOA regulations.
- 6. Should the sub-recipient disagree with the findings, they may appeal the findings in writing. The NMTWB will consider the appeal and provide a final report within 60 days.

### B. Monitoring and Oversight by Staff and Function

<u>Program Quality Assurance Specialist</u> – responsible for quarterly monitoring of programmatic compliance with required laws, policies, plans, and procedures at the federal, state and local levels for adult, dislocated worker, national dislocated worker, and youth programs. Includes desk top review of participant eligibility, activities, direct participant expenditures, proper documentation, case management, and follow up utilizing the elements from the Tennessee Department of Labor and Workforce Development (TDLWD) Monitoring Guide. May also include on-site visits and interviews with participants. Prepares a formal, written, quarterly programmatic report, including any observations, areas of concern, and necessary corrective actions. The Program Quality Assurance Specialist works with the sub-recipient and Board staff to ensure corrective actions are taken for any programmatic or fiscal findings.

<u>WIOA Fiscal Director</u> – with assistance of staff, is responsible for quarterly fiscal monitoring to include desktop review of subcontracts, invoices, and grant budget and expenditure rates. Prepares a formal, written quarterly fiscal report including any observations, areas of concern, and necessary corrective actions. The WIOA Fiscal Director works with the sub-recipient and Board staff to ensure corrective actions are taken for any fiscal findings.

<u>Director of Policy and Performance</u> – responsible for providing policy and guidance to the sub-recipient regarding eligibility, record keeping, performance, and program objectives including WIOA Core Performance Measures and Key Performance Indicators (KPI). Program objectives are monitored on a quarterly basis at a minimum. The Director of Program and Planning and the Director of Policy and Performance review internal reports and reports submitted by the One Stop Operator and Career Service Provider as well as prepare summary reports to be presented to the NMTWB.

<u>Equal Opportunity Officer</u> – responsible for overseeing, investigating, and documenting complaints alleging discrimination or denial of equal opportunity and submitting American Job Center complaint logs to TDLWD.

#### C. Additional Monitoring

The NMTWB and staff reserve the right to conduct additional monitoring outside the established procedures in this policy. Additional monitoring will occur when there is reason to suspect that there are non-compliant practices occurring by the sub-recipient.

#### D. Appeals Process

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

Monitoring Policy 2 | P a g e

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

#### References

2 CFR Part 200; 20 CFR 683.400-420; 2 CFR part 2900; WIOA Sec. 188; TEGL 23-19, WFS Policy – Monitoring, TDLWD Monitoring Guide

Authorized by:	Approved by:	
Marla Rve. Executive Director Date	 John Zobl, Chairman	 Date



November 10, 2020

# **Executive Summary**

# **Grievance and Complaint Resolution Policy**

1. What is the general purpose of this policy?

To provide instruction and procedures regarding grievances and complaints resolution from participants and other interested parties.

- 2. What are the notable guidelines conveyed within this policy?
  - Describes the NMTWB staff roles and required documentation regarding complaints and/or grievances
  - Describes the complaint and/or grievance process that are non-discriminatory in nature
  - Describes the discriminatory complaint process

# 3. What are the modifications to this policy?

The policy was updated to describe the NMTWB staff roles and required documentation for both non-discriminatory and discriminatory complaints and/or grievances.



Effective Date: 10.01.2018 Revised Date: 11.10.2020 Duration: Indefinite

## **Grievance and Complaint Resolution Policy & Procedures**

#### **Purpose**

The purpose of this guidance is to provide instruction on the policy and procedures required under the Workforce Innovation and Opportunity Act (WIOA) regarding grievances and complaints from participants and other interested parties.

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

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

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

#### **Policy & Instructions**

#### A. Discrimination or Denial of Equal Opportunity Complaints

WIOA Section 188 prohibits discrimination against individuals in any program or activity that receives financial assistance under Title I of WIOA as well as by the One-Stop Partners listed in WIOA Section 121(b) that offer programs or activities through the One-Stop/American Job Center system. WIOA Section 188 prohibits discrimination on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, citizenship status or because of an individual's participation in a program or activity that receives financial assistance under Title I of WIOA (29 CFR Part 38).

No person in the United States shall, on the grounds of race, color, national origin, or disability, be excluded from, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving Federal financial assistance from the Department of Labor (29 CFR Part 31.3 and 32.4).

It is against the law for the Northern Middle Tennessee Workforce Board, a recipient of Federal financial assistance, to discriminate on the following basis:

- Against any individual in the United States, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief; and
- Against any beneficiary of programs financially assisted under Title I of Workforce Innovation and Opportunity Act of 2014 (WIOA), on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his/her participation in any WIOA Title I – financially assisted program or activity.

The Northern Middle Tennessee Workforce Board must not discriminate in any of the following areas:

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

Applicants/participants, or other interested parties, who feel that they have received unequal treatment should contact the Northern Middle Tennessee Workforce Board, Equal Opportunity Officer (EOO), 931-905-3507, TTY/TDD 1-800-848-0299. Informal procedures will be initiated to resolve the applicant/participant's complaint. One-on-one assistance is available for individuals with disabilities when necessary. If these procedures do not resolve the issue to the applicant/participant's satisfaction, the Equal Opportunity Officer will advise the applicant/participant of the formal complaint procedure as follows:

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

Northern Middle Workforce Board Equal Opportunity Officer 523 Madison Street Suite A Clarksville, TN 37040 TTY/TDD: 1-800-848-0299 TN Dept. of Labor & Workforce Development Attn: EO Officer 220 French Landing Drive Nashville, TN 37243 Phone: 615-253-1331 TTY/TDD: 615-532-2879 US Department of Labor Director, Civil Rights Center US Department of Labor 200 Constitution Avenue, NW Room N - 4123 Washington, DC 20210 TTY: 202-693-6516

To file a complaint with the Northern Middle Tennessee Workforce Board Equal Opportunity Officer (EOO):

- a. All complaints must be submitted in writing to the EOO at 523 Madison Street, Suite A, Clarksville, TN 37040 within 180 days of the date of the incident
- b. All complaints must be filed using the Employment and Training Administration (ETA) Complaint/Apparent Violation Form
- c. The EEO will provide written acknowledgement of receipt of complaint to complainant.
- d. The EEO will launch an investigation and hold a formal verbal discussion with complainant within fifteen (15) working days of receipt of complaint.
- e. The EEO will communicate a written decision to the complainant within ten (10) working days of the verbal discussion.
- f. If a resolution is not obtained at the local level within sixty (60) days of the filing of the complaint, or either party is dissatisfied with the local hearing decision, an appeal may be filed with the Tennessee Department of Labor and Workforce Development (TDLWD) at WIOA.complaints@tn.gov.

If a complaint is filed with the Northern Middle Tennessee Workforce Board, the individual must wait either until the Workforce Board issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center. If the Northern Middle Tennessee Workforce Board does not give a written Notice of Final Action within 90 days of the day on which the individual filed a complaint, the individual does not have to wait for the Workforce Board to issue that Notice before filing a complaint with the Civil Rights Center. However, the individual must file with the Civil Rights Center within 30 days of the 90 day deadline.

If the Northern Middle Tennessee Workforce Board does give written Notice of Final Action, but the individual is dissatisfied with the decision or resolution, a complaint may be filed with the Civil Rights Center. An individual must file a Civil Rights Center complaint within 30 days of the date on which he/she received the Notice of Final Action.

The Northern Middle Tennessee Workforce Board is an Equal Opportunity Employer/Program. Auxiliary Aides and services are available upon request to individuals with disabilities.

#### **B. Non-Discriminatory Complaint Process**

This complaint procedure is limited to complaints, and/or grievances that are non-discriminatory in nature. The follow process is required for:

- Complaints alleging unjust denial of WIOA services;
- Complaints made by staff within the LWDA against other LWDA staff or a sub-recipient entity

This procedure applies to program participants, applicants, service/training providers, and other interested parties. One-on-one assistance is available for individuals with disabilities when necessary.

- 1) All complaints must be filed by the within one hundred eighty (180) calendar days of the alleged occurrence
- 2) The complainant must be provided a copy of the Tennessee Department of Labor and Workforce Development (TDLWD) Grievance and Complaints Resolution Procedures.
- 3) Staff should follow the guidelines outlined in Attachment I and II of the TDLWD Grievance and Complaints Resolution Procedures.
- 4) The Northern Middle Tennessee Workforce Board has developed the following local complaint and grievance procedures:
  - a. All complaints must be submitted to the Executive Director of the Northern Middle Tennessee Workforce Board (NMTWB) at: Executive Director, 523 Madison Street Suite A. Clarksville, TN 37040.
  - b. All complaints must be filed using the Employment and Training Administration (ETA) Complaint/Apparent Violation Form
  - c. The Executive Director or their designee will provide written acknowledgement of receipt of complaint to complainant.
  - d. The Executive Director or their designee will launch an investigation and hold a formal verbal discussion with complainant within fifteen (15) working days of receipt of complaint.
  - e. The Executive Director or their designee will communicate a written decision to the complainant within ten (10) working days of the verbal discussion.
  - f. Should the complainant not be satisfied, the complainant may file a written appeal, prepared consistent with item b above, with the Board Chairman.
  - g. Upon receipt of an appeal, the Chairman will convene an ad hoc committee to review the appeal. The hearing will be limited to the original complaint and the complainant can choose to be represented by another individual, including legal counsel.
  - h. The committee will render a written decision to the complainant within five (5) working days of the hearing. If more time is needed to reach a decision, the complainant will be notified in writing of the time by which a decision will be made.
  - i. If a resolution is not obtained at the local level within sixty (60) days of the filing of the complaint, or either party is dissatisfied with the local hearing decision, an appeal may

be filed with the Tennessee Department of Labor and Workforce Development (TDLWD) at WIOA.complaints@tn.gov. The TDLWD decision may be appealed to the Secretary in the event that a decision has not been reached within sixty (60) days, or a decision has been reached and the party wishes to appeal to the Secretary.

j. An individual party to a collective bargaining agreement, alleging a labor standards violation, may also submit the grievance to a binding-arbitration procedure.

#### C. Hostile Work Environment, Unrelated to American Job Center Staff

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

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

II. Complaints to TOSHA:

Grievance and Complaint Resolution Procedures

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

More information can be accessed at <a href="https://www.tn.gov/workforce/employees/safety-health/tosha-redirect/file-a-safety-complaint.html">https://www.tn.gov/workforce/employees/safety-health/tosha-redirect/file-a-safety-complaint.html</a>

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

All processes and procedures described in this policy will be made available in hard copy and posted on the Northern Middle Tennessee Workforce Board website at <a href="https://www.nm-wb.com">www.nm-wb.com</a>.

Authorized by:		Approved by:	
Marla Rye, Executive Director	Date	John Zobl, Chairman	Date

4 | Page

OMB Approval No. 1205-0039 Expiration Date: Dec. 31, 2018

#### For Official Use Only

### Complaint/Apparent Violation Form<sup>1</sup>

Complaint No.		Date Received			
Part I. Complainant's Informat	tion <sup>2</sup>	Respondent's Information <sup>3</sup>			
Name of Complainant (Last, First, Middle Initial)		Name of Person, Company, or Agency the Complaint is Made     Against			
2a. Permanent Address (No., St., City, State, ZIP Code)		5. Name of Employer (if different from Part I #4 above) /One-Stop Office			
b. Temporary Address (if Appropriate)		Address of Employer/One-Stop Office			
3a. Permanent Telephone	b. Temporary Telephone	7. Telephone Number of Employer/One-Stop Office			
8. Description of Complaint or Ap	parent Violation (If additional spa	ace is needed, use separate sheet(s) of paper and attach to this form)			

Certification

I CERTIFY that the information furnished is true and accurately stated to the best of my knowledge. I AUTHORIZE the disclosure of this information to other enforcement agencies for the proper investigation of my complaint. I UNDERSTAND that my identity will be kept confidential to the maximum extent possible, consistent with applicable law and a fair determination of my complaint.

9. Signature of Complainant<sup>4</sup>

10. Date Signed

/ /

<sup>&</sup>lt;sup>1</sup> For information regarding complaints that are covered through the Employment Service and Employment-Related Law Complaint System see 20 CFR 658 Subpart E.

<sup>&</sup>lt;sup>2</sup> If the Complaint/Apparent Violation Form is used to submit an Apparent Violation, the name of the Complainant is not necessary and may remain anonymous. Parts 2a and 2b also do not need to be filled out if the form is used for an Apparent Violation.

<sup>&</sup>lt;sup>3</sup> For definition of "Respondent" see 20 CFR 651.

<sup>&</sup>lt;sup>4</sup> No signature is required at Part 9 if this form is submitted as an Apparent Violation.

Part II. For Official Use Only			
1. Migrant or Seasonal Farmworker?  Yes No  2. Complaint or Apparent Violation? Complaint Apparent Violation  3. Type of Complaint or Apparent Violation ("X" Appropriate Box(es)):  Employment Service Related  Job Order No.  Against Local Employment Service Office Against Employer  Alleged Violation of Employment Service Regulations  Employment-Related Law	4. Issue(s) involved in Complation ("X" Appropriate Both Wage Related  Child Labor  Working Conditions  Migrant and Seasona Agricultural Worker Protection Act (MSPAT)  Discrimination Other (Specify)	Housing Pesticides Health/Safety Disability Discrimination	5. H-2A/Criteria Employer ("X" Appropriate Box(es)):  U.S./Domestic Worker H-2A Worker Wages Transportation Meals Housing Other Other
6a. Referrals To Other Agencies ("X" Appropria  WHD. U.S. DOL. OSHA U.S. D. EEOC Other  b. Follow-Up Monthly C. Yes No Quarterly		Address of Referral ZIP Code and Telep	Agency (No., St., City, State, hone No.)
8. Explanation of Complaint/Apparent Violation (If additional space is needed, use separate sheet of paper)			
9. Actions Taken on Complaint/Apparent Vio Action Taken By:  Action Taken:	olation (If additional space is need) (First and Last Name)	eded for multiple action	
10. Complaint /Apparent Violation resolved? Yes No If "No", explain.  11. Provided other One-Stop Services? Yes No If "No", explain.			
12a. Name and Title of Person Receiving Co	omplaint		s (No., St., City, State, ZIP Code)
12c. Phone No.		12d. Signature	12e. Date

Public Burden Statement

Persons are not required to respond to this collection of information unless it displays a currently valid OMB Control Number. Obligation to reply is required to obtain or retain benefits (44 USC 5301). Public reporting burden for this collection is estimated to average 8 minutes per response, including the time to review instructions, search existing data sources, gather and maintain the data needed, and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this collection, including suggestions for reducing this burden, to the U.S. Department of Labor, Employment and Training Administration, Office of Workforce Investment, Room C-4510, 200 Constitution Avenue, NW, Washington, DC 20210.

<sup>&</sup>lt;sup>5</sup> For DISCRIMINATION COMPLAINTS ONLY. Persons wishing to file complaints of discrimination may file either with the State Workforce Agency, or with the Directorate of Civil Rights (DCR), U. S. Department of Labor, 200 Constitution Avenue, NW, Room N-4123, Washington, D.C. 20210