



**Northern Middle Tennessee Local
Workforce Development Board**

Local Plan 2019

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NORTHERN MIDDLE TENNESSEE LOCAL WORKFORCE DEVELOPMENT BOARD

OPERATING SYSTEMS AND POLICIES

A. DESCRIPTION OF THE ONE STOP DELIVERY SYSTEM. The mission of the Northern Middle Tennessee Local Workforce Development Board (NMTLWDB) and its partners is to help job seekers access employment, education, training and resources to succeed in the labor market and to match employers with the skilled workers needed to compete in the global economy. The NMTLWDB delivers this through the American Job Center system providing high quality customer service to employers and job seekers. The NMTLWDB sets the strategic direction through aligning workforce resources and monitors performance to ensure job seekers meet and exceed employer demands to include performance requirements under WIOA. The NMTLWDB aligns its focus and vision with the Governor's goals: Prioritizing the strategic recruitment of target industries; Assisting existing Tennessee businesses in expansion and to remain competitive; Supporting regional and rural economic development strategies; and Investing in innovation and reducing business regulation. The American Job Center (AJC) framework is focused on meeting or exceeding the following objectives:

1. Identify, assess, and certify skills for successful career.
2. Promote economic development by connecting workforce development with job creation.
3. Increase employer engagement with the workforce system.
4. 4) Expand education to create career pathways from high school through higher education.
5. 5) Increase work based learning.

Each of these objectives have a common theme of developing the necessary skills for good employment for job seekers and skilled workers for employers. The partners have collaborated to integrate services in the American Job Centers to provide a seamless flow for job seekers to access the necessary services without program emphasis. This meets the Governor's vision of leveraging existing assets by coordinating the partner services to efficiently use the appropriate program(s) for each job seeker. By working with the job seeker through career pathways, the partners position the job seeker in the most positive course of action to a high-quality job. The Business Services Team work with existing and new businesses to offer services available to them through the American Job Centers. Reaching out to the employers also helps the Center partners identify the in-demand jobs available in the community and ways to best serve the employer. This meets the Governor's vision of attracting new businesses to the state while helping existing businesses expand and remain competitive. Since the local workforce area is made up of rural, suburban and

metro areas, we have the unique challenge of meeting the needs of job seekers and employers and supporting the diverse economic development strategies.

The delivery of services to businesses and job seekers is delivered through the American Job Center System located within the 13 county area known as the Northern Middle Tennessee Workforce Area. There are offices located in 12 of the 13 counties with four being Comprehensive and eight Affiliate centers. Currently there are two additional centers servicing soldiers departing the Fort Campbell military base, which is within the Northern Middle Region. There is an access point on the military base itself as well as a specialized center partnering with the Western KY Workforce Board, to specifically address the needs of soldiers and military spouses. The NMTLWDB is reviewing its delivery area and is currently conducting an analysis of its traffic count within the career center system to see if additional outreach is needed in rural counties. Additionally, a cost analysis is ongoing for the two centers located in Davidson and Rutherford Counties due to their current locations being state owned property. The partners of the American Job Centers in NMTLWDA feel that the delivery of all programs is progressing toward the mutual visions of the Governor, State Board, Local Board and partners.

ON DEMAND ACCESS. The Tennessee Department of Labor and Workforce Development is currently testing a new on demand access point in the Montgomery County AJC. The concept is to bring required career services to customers in the most inclusive and appropriate settings and direction. The highlights of the system are listed below and are in the testing phase at this time. AJC staff are reviewing and responding to its use and reliability to state officials.

Individual User: Job seekers and individual users will have numerous additional capabilities in version 19.0, including the following enhancements:

New Widgets – four new widgets on the individual dashboard include: *Paths* (linking to a new *Paths* tab), *Achieve Your Goals*, *Employer Services* (with a new Trending link), and *Related Posts*.

Improved Résumé Builder – adds a restructured and simplified first page of the Résumé Builder with three options: *Create résumé from scratch*, *Use an existing résumé*, and *Duplicate a résumé in our system*.

Enhanced Job Search Tabs – include the use of expandable, accordion controls and incorporation of Job Number search as a check box in Keyword search criteria.

New Intelligent Search – a *Job Search* tab with options to search based on unique *Crowd Search*, *Match Search*, and *Pathfinder* options that are based on the jobs to which other job seekers are applying, matching to criteria similar to the user's occupation, job experience, or other preferences.

Improved Job Search Virtual Recruiter – lets job seekers save a wider range of search criteria in any automated, Virtual Recruiter job searches.

Redesigned Job Details Screen – includes buttons that stay at the top of scrolling job details, such as *How to Apply*, *Like this Job*, and *More Jobs Like This* buttons. It also includes

redesigned and expanded job details screens with a friendly look and feel and with more detail areas (including added data and carts options from Labor Market Information).

New Paths Tab – lets individuals see goals and earn badges as they meet goals. This can culminate in earning a Smart Seeker status when all eight badges are earned (representing important tasks like creating résumés and performing self-assessments). When individuals earn the Smart Seeker status, employers can also see that icon in candidate searches.

Employer User: The enhancements for employers include the following: **Enhanced Candidate Search Tabs** – include expandable, accordion controls, the ability to search for internal and/or external résumés, and the ability to see résumé sources, as well as candidates' Smart Seeker status in search results.

Staff User: Staff members will also see changes and new capabilities, including the following enhancements:

An Interface Facelift – adds larger icons and improved, more visible fonts used in text boxes, check boxes, radio buttons, and other controls. This also includes an improved display of alert information throughout staff screens, closer to the related fields that need attention.

ONE STOP OPERATOR. Maximus Human Services, Inc. and Workforce Essentials, Inc. are the One Stop Operators for the Northern Middle Workforce Area. They were procured through RFPs authorized by two different Boards and contracts were initiated and extended through the current re-alignment of the 13 counties. New RFP's are scheduled for release in January of 2019 for subsequent years. The scope of services are listed below.

The following is the Scope of Service for the One-Stop Operator(s) for Maximus and Workforce Essentials.

A. Coordinate Services of One-Stop partner programs

The One-Stop Operator will be responsible for the coordination of core and required partners, both on-site and off-site, for the comprehensive center, including, but not limited to the following activities:

1. Designing and implementing a multi-partner orientation for customers.
2. Developing multi-partner materials to provide a comprehensive overview of all available services.
3. Scheduling regular staff meetings with on-site partners and coordination meetings with off-site partners at an interval defined by the LWDB.
4. Developing and implementing training manuals and instructional activities to promote excellence in customer service and other AJC related topics.

5. Providing technical assistance to staff and partner agencies to understand the vision, mission, goals and objectives of the LWDB and the AJC.
6. Cross training of AJC staff, as appropriate, to increase staff capacity, expertise, and efficiency.
7. Working with Team Leads to develop adequate staffing plans for the comprehensive center(s).
8. Overseeing AJC property, including building(s) and equipment, and facilitating appropriate changes and/or maintenance to assure the One-Stop property presents a professional atmosphere for job seeker, employer and partner customers and is conducive to AJC activities, and reporting any maintenance or other issues to the owner/lessor, as appropriate.
9. Working with direct supervisors/team leaders to ensure functional alignment of AJC partner staff located in the center(s), including:
 - Scheduling staff to assure appropriate coverage of customer service needs during regular, holiday and/or extended hours, as needed.
 - Implementing work schedules for "shared" responsibilities (customer flow, general workshops, etc.) that are fair and equitable to all AJC partner staff.
 - Providing leadership and guidance to encourage AJC partner staff to function as a team.
 - Addressing deviation from functional supervision with AJC partner staff to resolve, with their respective supervisor if needed.
 - Evaluate services being provided at the AJCs to ensure that all required services as mandated by state and federal laws are being provided at or through the Centers.
10. Coordinating the continuing good standing of AJC Certification status as directed by the LWDB Executive Director or State.
11. Coordinating services with the LWDB's affiliate and/or identified access points to assure that partners are apprised of comprehensive center services for referral of customers.
12. Evaluate branding throughout the Centers to ensure consistency and adherence to all federal, state and local mandates.

B. Observe and evaluate service delivery

The One-Stop Operator will be responsible for observing and evaluating service delivery throughout the AJC delivered by on-site partners. This shall include but is not limited to:

1. Observing and addressing any concerns to assure the staff present is professional, including, but not limited to appearance, conduct and service to customers.
2. Ensuring meaningful access to all customers by incorporating the principles of universal and human-centered design, for example: flexible space usage; the use of

pictorial, written, verbal, and tactile modes to present information for customers with disabilities and English language learners; and providing recommendations to the LWDB for necessary accommodations and adequate space for the use of assistive devices and adaptive technologies.

3. Ensuring that all services are being provided in a manner consistent of any local, regional or state plans created and/or certified by the LWDB.

C. Report to the LWDB, through the facilitation of shared data, with emphasis on state systems

The One-Stop Operator will facilitate the sharing and maintenance of data in the comprehensive center(s), including but not limited to State systems, and report out to the LWDB such data by:

1. Providing any reports as deemed necessary by the LWDB including but not limited to performance data for all on-site partners, pace of spending reports, cost per outcome, business and jobseeker service.
2. Coordinating with LWDB Executive Director to determine applicable policies/procedures for data sharing and maintenance of Personally Identifiable Information (PII) and ensure the protection of data.
3. Establishing LWDB approved data sharing agreements between AJC internal and external partners to streamline customer service.
4. Training AJC staff on sharing and maintenance of data protocols, including PII and confidentiality.

D. Evaluate performance of the comprehensive AJCs

The One-Stop Operator will evaluate performance of comprehensive center(s) by:

1. Providing innovative solutions for underperformance and ideas for improving on strengths.
2. Developing a working knowledge of WIOA Performance Measures for all AJC partners, including how they correlate for overall performance of local and regional goals.
3. Developing a working knowledge of the system(s) used in the center(s).
4. Preparing and analyzing reports related to One-Stop services for the LWDB
5. Developing and initiating LWDB approved evaluation processes to determine customer experiences in the comprehensive center(s).
6. Reviewing AJC Certification Application and Memorandum of Understanding to have a general knowledge of partner program services.
7. The One-Stop Operator will not perform any of the duties stated in 678.620 (b) to avoid conflict of interest.

REFERRAL PROCESS. The One Stop Operator oversees the referral process of customers within the AJC system and is tied directly to the AJC MOU which is the baseline agreement signed by all partners within the AJC system. All core and other program partners have agreed to the referral process, which enhances seamless services to customers and leverages funding and services available to business and job seekers. The referral process of the primary partners are listed below in the following section. The remaining agreement can be found in the MOU itself.

B. LOCAL REFERRAL.

Title I (Adult, Dislocated Worker and Youth) –

Cross training and an understanding of partner services is critical to the referral process. Title I participants may be referred to various partners after an initial assessment and the needs of the participant are identified. When the partner is physically located in the AJC, the participant may be escorted to the partner for introduction and referral. Referrals may also be made through VOS or other electronic means. External partner referrals may take place through phone call or other electronic means to set an appointment for the participant. With the integration of the partner services in the AJCs the participant is able to receive a full array of service without a specific identification of the program, just the understanding that they are being assisted.

Title II (Adult Education and Family Literacy) –

Title II staff will, after an assessment is made determining the need, refer appropriate clients to applicable partner program staff electronically via jobs4tn.gov, when that partner is a user of that system; in addition to an in person warm handoff directly to staff. In the event that the partner is not a user of jobs4tn.gov, and is physically located within the AJC, the warm in person handoff will be made, followed up by an email. In all other cases, the referral will be made via email and/or telephone, except in the case of UI, when the referral will be in the form of direction to the applicable website, and/or to the Zendesk ticket creation process or Zopim chat or direct referral via telephone.

Title III (Employment Services under Wager-Peyser) –

Title III staff will, after an assessment is made determining the need, refer appropriate clients to applicable partner program staff electronically via jobs4tn.gov, when that partner is a user of that system; in addition to an in person warm handoff directly to staff. In the event that the partner is not a user of jobs4tn.gov, and is physically located within the AJC, the warm in person handoff will be made, followed up by an email. In all other cases, the referral will be made via email and/or telephone, except in the case of UI, when the referral will be in the form of direction to the applicable website, and/or to the Zendesk ticket creation process or Zopim chat or direct referral via telephone.

Title IV (Rehabilitation Services) –

The Vocational Rehabilitation Program (VR) may make referrals to any available partner program to meet the rehabilitation needs of eligible individuals. For co-located staff or VR offices, the referral method will meet the AJC partner standard. The local service MOU agreement illustrates the collaboration between VR partners to ensure best use of resources in providing services to customers. VR tracks referrals using specific referral codes and an electronic case management system.

- C. ADULT AND DISLOCATED WORKER ACTIVITY.** Each partner of the American Job Centers in NMTLWDA is committed to aligning workforce programs and activities seeking the best employment and education solutions for the job seekers in the area and to building the relationships with employers by providing the needed services. Services are integrated and delivered according to customer need without emphasis on program. Assessments are conducted on each customer to determine their needs and services. Service delivery is divided into three functions: Welcome Function (Basic Career Services), Skills/Career Development Function (Individualized Career Services), and Business Services Function. Participants visiting the AJCs will be greeted by the shared staff at the welcome desk, where they will be triaged to an appropriate service. Services may include the following: registration, orientation to services, re-employment program questions, provision of labor market information, access to resource room, initial assessment, identification of basic skill deficiencies, self-directed job referral and placement, referral to workshops, and referral to other community services. Services may also include skills analysis, facilitated assessments and testing, (COPS, COPEs, CAPS, TABE) identifying support needs, provide career guidance and coaching, arrangement for soft skills training, and referring job seekers to program specific occupational training. Cross training is provided to staff in order to serve participants efficiently with AJC basic services. Through knowledge of partner programs, staff can make the referrals appropriately to better serve job seeker needs. The relationship between the partners is open and available to job seekers in conversations and meetings for resolution to any difficulties that may arise.

Rapid Response activities are provided by the Business Services Team, a lead staff person receives WARN notification, contacts the employer to collect information and with partner collaboration puts together a team of appropriate staff and resources for a Rapid Response meeting.

- D. YOUTH ACTIVITIES.** Through a network of subcontractors the NMTLWDB will provide the mandatory fourteen youth elements while enhancing best practices led by five youth providers within the 13 county region. These will be delivered in traditional and non-traditional formats via the American Job Center Network and targeted zones within some counties where additional at risk youth live. This approach to tailored program availability as compared to a single framework for all youth will enable intake, assessment, skill upgrades and employment plans to be tailored to each youth's needs while maximizing the resources of the contractors and other community based organizations. Adult education is a key provider that currently is tied directly to the AJC system and the Career Service

Provider (CSP) will be providing incentives to youth who earn their High School Equivalency Diploma through the AE program as a motivational tool. A solid educational footing allows youth to become self-sufficient and opens the options for further education and training opportunities. The Board has Vocational Rehabilitation as a primary partner located in the AJC as well as a CSP who also acts as a Ticket to Work Employment Network that can leverage funding and options to alleviate barriers to employment and education targeting those youth with disabilities.

The current CSP youth providers have numerous years of experience of placing at risk youth to work through enhancing skill sets, developing career pathways, making employer connections in areas such as work experience, and aligning educational opportunities to ease barriers to employment. The youth providers have goals and objectives and report monthly the status of youth being served via VOS and additional spreadsheets. Youth providers tie their reimbursements to reconciling individual payments to customers in VOS. These are monitored by the Board staff to ensure that in school and out of school at risk youth are served to include that percentages of expenditures are properly administered via ITA's as well as expenditures for work experience. These are reported to the Board in their quarterly meetings via the Youth Board committee.

- E. **PRIORITY OF SERVICE.** Local Board has a policy and procedure for determining priority. The following process is used to determine priority.
- A. Priority is determined during the eligibility process.
 - B. *Basic Career Services* are available to all job seekers without priority.
 - C. To be eligible to receive *WIOA Adult Individual Career or Training services*, an individual must be all of the following:
 - a. 18 years of age or older;
 - b. Citizen or noncitizen authorized to work in the United States; and
 - c. Meet Military Selective Service registration requirements (males only)
 - a. Career coach will assess the client's income for the past six-months prior to the date of enrollment.
 - b. Client will provide documents to the Career Coach as proof of earnings six-months prior to the date of enrollment. Documents may include paycheck stubs, public assistance records, State MIS, Social Security benefits, UI documents, self-attestation, or case notes.
 - D. Determine Basic Skills Deficiency
WIOA Section 3(5)(B) "An individual who is unable to compute or solve problems, read, write, or speak English at the level necessary to function on the job, in the individual's family, or in society." The Career Coach will determine basic skills deficiencies by an objective, valid, and reliable assessment. Documentation of the assessment will be maintained in the participant's file, clearly stating name, date of test and results.

Priority of Service for the Title I Adult program must be applied in the following order:

- a. Veterans and eligible spouses who meet the statutory priority (such as public assistance recipients, other low-income individuals including the underemployed, or those who are basic skills deficient) and Title I adult program eligibility must receive the highest level of priority for services;
- b. Other individuals (not veterans or eligible spouses) who meet the statutory priority (such as public assistance recipients, other low-income individuals including underemployed, or those who are basic skills deficient) and Title I Adult program eligibility then receive the second level of priority for services;
- c. All other veterans and eligible spouses who meet Title I Adult program eligibility then receive the third level of priority for services;
- d. Other individuals (not veterans or eligible spouses) who do not meet the statutory priority (such as public assistance recipients, other low-income individuals including underemployed, or those who are basic skills deficient) but do meet a local discretionary priority and Title I Adult program eligibility, then receive the fourth level of priority for services. Note: This level requires approval from the Director of Career Services Provider or their designee. SEE PRIORITY POLICY.

F. INDIVIDUAL TRAINING ACCOUNTS. Individual training accounts allow Adults, Dislocated Workers and Out-of-School Youth to purchase training that will assist them in obtaining self-sufficient employment. Priority of services will be observed when providing ITA.

- The Training Program must appear on the state approved training provider list.
- Training must be a demand occupation. In-demand information can be obtained from “Bright Outlook” in the VOS data base system.
- Training must result in a recognized credential such as a degree, certificate, license, etc.
- Training should be short-term and not exceed 18-24 months in duration. Ideally, training of 12 months or less is preferred.
- Training ITAs cannot be issued for more than \$6,000 per enrollment without the approval of the Board.
- All other available financial resources such as Pell grants, TN Reconnect, TN Promise, Wilder/Naifeh, Lottery, TSAC, other scholarships, etc., must be used first towards payment of tuition, fees and books prior to WIOA dollars being expended.
- If customer is attending training at the time of WIOA enrollment, they must submit grades/progress reports before ITA is issued to ensure satisfactory progress is being met.
- Customer must provide grades/progress reports at the end of each quarter/semester/etc. or additional funds will not be authorized.

- ITAs are to be awarded per training provider term.
- The Career Coach will issue the ITA.
- Participants will be provided information on the Training Providers in order to make an informed choice.
- Out of state and on-line training provider programs must be on their states eligible training provider list before an ITA can be issued.
- A copy of the completed ITA must be forwarded to the training provider. If for some reason the ITA is voided, a copy of the "VOID ITA" must be forwarded to training provider with explanation and documentation on how void ITA was disbursed (i.e. fax, scan, mail, etc.) and put in electronic customer file.
- In order to efficiently manage WIOA funds a Career Coach must de-obligate the remaining balance or unexpended funds to be recaptured and allocated to other customers.

Contracts for services may be used instead of an ITA only when one or more of these exceptions apply:

- The services provided are OJT, customized training, incumbent worker training, or transitional jobs;
- The Board determines that there are an insufficient number of Eligible Training Providers in the local area to accomplish the purpose of a system of ITA;
- The Board determines that in the area there is a training-services program of demonstrated effectiveness offered by a community-based organization or other private organization to serve individuals with barriers to employment;
- The Board determines that the most appropriate training could be provided by an institution of higher education to train multiple individuals for jobs in sector-demanded occupations, provided this does not limit customer choice; or
- The Board is considering entering into a pay-for-performance contract and the Board ensures that the contract is consistent with 20 CFR 683.510.

G. CUSTOMER CHOICE. Jobs4TN.gov lists providers and training programs that provide local and regional training opportunities, which is governed through the states Eligible Training Provider List (ETPL). Additionally, surrounding states bordering TN also have approved training lists. This portal for educational opportunities also gives feedback as to success of each program depending on the institutions history of graduation rates and job placements. Each individual that aspires to attend additional training goes through a series of assessments via their case manager that points them into a direction for success and alignment into the correct career pathway. The final career decision is up to the customer, but through case management guidance and analysis of ETPL programs, the customer is able to make informed decisions in their choice for aligned training when launching new careers.

- H. TRAINING PROVIDER APPROVAL.** The Training Provider must initiate applications for initial eligibility by completing an online New Provider Application. The online application is first submitted to the LWDB for verification of completeness. The LWDB must verify that the Provider is in compliance with all Tennessee regulations pertaining to training authorization. If the Provider is compliant and their application is complete, and the provider delivers the instruction within NMTLWDB the state will forward the Provider application on to the NMTLWDB within 5 days of receiving the necessary verifications. NMTLWDB will ensure that the Provider meets their local eligibility criteria and vote to decide if the Provider and the associated programs will be added to the ETPL. Providers must supply any additional supplemental information requested by the NMTLWDB to assist in the initial eligibility decision. Applications must be presented in the time and manner determined by the NMTLWDB and may ask the provider for a formal presentation in front of the full Board prior to the Board voting on the program. SEE BOARD POLICY #14.
- I. SUPPORT SERVICES.** Job Seekers who face significant barriers to employment or training may require support services allowed under WIOA section 133 and via the NMTLWDB Policy #3. The job seeker needs to eliminate barriers, will be annotated in their file. It must support their individual service strategy. Partner programs that could also provide some level of supportive service should be used first. Referrals are aligned with other partner programs through the AJC MOU document to increase cost effectiveness and avoid duplication. When multiple options exist for receiving support services, case management staff must document that a reasonable effort was made to choose the most effective method and cost effective price. All activities are entered into the state system Virtual One Stop (VOS). Further allowable and unallowable services are seen in the attached POLICY #3.

VISION GOALS AND IMPLEMENTATION STRATEGY

- A. LOCAL BOARD WORKING WITH PARTNERS.** Within the 13 County area of Northern Middle there are 4 Comprehensive Centers and 8 Affiliates as well as an Access Point on Fort Campbell with a Specialized Center to be open soon. The NMTLWDB has ensured they are all electronically linked. A partner MOU is in place. A seamless referral process is in place. Representatives of Title I, II, III, and IV staff are actually located within the Comprehensive Centers. The partners and offices provide a seamless delivery system for business and job seekers while increasing collaboration and leveraging resources. Service integration is key to organizational success and delivery. Eligible individuals, especially those with barriers to employment, can access services truly within the 'one stop' under one roof to formulate career plans without having to reach out multiple offices to find assistance. Universal access, streamlined business teams, linked referrals and targeted in-demand training highlighted through Bright Outlook, provides true service integration as highlighted via state Workforce Services Policy and guidelines. Job seekers who require multiple services to achieve self-sufficiency are co-enrolled in programs to leverage resources and speed the individual quickly on their career pathway.

- B. INCUMBENT WORKER TRAINING.** The NMTLWDB has identified in-demand occupational sectors to assist job seekers in order to provide appropriate training to meet the needs of employers. The Board has created guidance and controls as well as policy to allow grants for up to \$25,000 for Incumbent Worker Training, On-the-Job training, and Apprenticeships. The Business Services team, under the direction and guidance of the NMTLWDB and 13 County Mayors have instituted a strong outreach to business and industry via the Consolidated Business Grants (CBG). They also provide work experience for youth and TANF recipients who need to build their skill sets toward a career path. The Board has already awarded 33 CBG grants to business and industry encompassing large to small businesses across the 13 county area this past year. There are 21 Incumbent Worker contracts, 6 On-the-Job contracts and 5 Apprenticeship contracts that have been active just this past quarter. Companies such as North American Stamping, PepsiCo, Heritage Farms Dairy, Clarksville Bookkeeping, have all benefited from these programs. In the end, the Boards focus is strengthening companies, strengthening communities and thus strengthening individuals.
- C. COORDINATION OF EDUCATION.** Workforce skills are at the heart of meeting the needs of employers worker supply. There are no generic workers, all are unique and each employer brings its own values and needs. Some will require highly skilled, highly technical workers while others rely on dependability and internal training for the honing of the basic skills. The successful region is one where there is a blend of basic and advanced skills with flexible employees and employers. Education also plays a key role in the development and eventually the delivery of the skills required with the workforce. The NMTLWDB is involved in matching that skill set to employers in a variety of ways to include participating in workforce studies such as the Montgomery County Comprehensive Labor Study, the Middle TN Wage and Analysis Study, Workforce 360 Economic Development Roundtables, and a variety of studies via the Nashville Chamber of Commerce. From analysis of these results, the Board is aligning educational opportunities to meet business and industry needs that are in demand and growing. Educational fields such as advanced manufacturing, health care, information technology, transportation and logistics and construction are all targets for job seekers and targets for investment of Board resources. These are delivered through our regional educational partners such as the Tennessee Colleges of Applied Technology as well as the Community Colleges. Scholarships in the form of Individual Training Accounts are awarded within these high demand fields that link to career pathways within the field. Representatives from the Tennessee Board of Regents are members of the NMTLWDB. The Board is involved in innovative ways in providing economic growth as seen in the recent submittal of a Wal-Mart Health Care Grant application between National Health Care, the Rutherford County Chamber of Commerce and the CSP, Workforce Essentials. Additionally, the Board is actively recruiting soldiers leaving the military from Fort Campbell, delivering adult education within the 13 county area, as well as participating as a partner with numerous labor and education grants (LEAP) across the region.

- D. CARL PERKINS.** The NMTLWDB with the direct assistance of the Title I- IV partners as well as other community-based organizations has developed a linked American Job Center system that focuses on solid business principles, professional staff and effective partnerships to ensure business and job seekers receive high quality services. All of the partners have entered into a MOU, including programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006. This leverages resources, eliminates duplication of services and streamlines functions. Through this agreement, funds are braided between the four core partners and others such as TAA, SNAP, RESEA, NCOA, SCSEP, DVOPs, LVERs and Jobs Corp. The delivery is through an integrated three-team function of the Welcome, Career Service and Business Service Teams.

PUBLIC ASSISTANCE RECIPIENT TO SELF SUFFICIENCY ELEMENT

- A. ALIGNING OUTCOMES.** The 23 member NMTLWDB and the 13 County Mayors led by the CLEO are unified in their guidance to utilize all the resources at hand through the AJC system to improve the outcomes for all TANF and SNAP recipients. In doing so they have devised an integrated system of referrals and policies to ensure direct customers of the Tennessee Department of Human Services have the resources necessary to align employment outcomes for successful career pathways in the workforce. The TANF population, currently comprised of 510 customers within District 5 and District 6, is being served in Northern Middle with two contractors, ResCare and Workforce Essentials. Both utilize the AJC system as their primary conduit and process to move their customers to self-sufficiency and connection to employers. Workforce Essentials has also partnered with the Board and is a paying customer in the comprehensive and affiliate centers on the western half of its region. Having the customer and their case manager within the career center system, where people and jobs connect, is optimum for leveraging all of the resources needed to eliminate barriers and provide the tools, resources, and work experience necessary for skill building in in-demand occupations.
- B. IMPROVING EMPLOYMENT RATES.** The objective of Workforce Essentials and ResCare is to build the career pathway for their TANF customer to achieve independence through wage gains, as skills are honed and increased. Both contractors conduct initial assessments, specify assistance needed to eliminate barriers, develop milestone incentive payments and provide the work experience and educational experience they will need to develop a career path. A key player to many TANF recipients is Adult Education. Many of the TANF recipients are co-enrolled in AE classes that furnish their HISET diploma or enhance reading and math skills to help them succeed in healthcare or information technology classes. Customers enrolled in SNAP, after their initial meeting are referred to Title 1 staff in the AJC for assessment and receive further assistance in either additional training, or support for job search. There are weekly job fairs at the AJC and that alone exposes the public assistance recipient to the world of work. Additionally, numerous hiring managers, while at the centers, give of their time and expertise to present impromptu workshops for TANF customers allowing them to hear work requirements from hiring authorities instead of from a caseworker.

C. **SIZE OF THE PROGRAM.** There are 510 TANF customers being served in District 5 and District 6, which encompasses Northern Middle. There have been 172 SNAP Employment and Training services delivered within the first quarter of the year in the Northern Middle Workforce Area.

D. **BARRIERS.** The 19 barriers for TANF customers are listed below:

Barrier	1 – In Crisis	2 – Vulnerable	3 – Safe	4 – Building Capacity	5 – Empowered
1. Shelter/Housing	Homeless or threatened with eviction.	In transitional, temporary or substandard housing; and/or current rent/mortgage payment is unaffordable (over 30% of income).	In stable housing that is safe but only marginally adequate.	Household is in safe, adequate subsidized housing.	Household is safe, adequate, unsubsidized housing.
2. Employment	No job.	Temporary, part-time or seasonal, inadequate pay, no benefits.	Employed full-time; inadequate pay; few or no benefits.	Employed full time with adequate pay and benefits.	Maintains permanent employment with adequate income and benefits.
3. Income	No income.	Inadequate income and/or spontaneous or inappropriate spending.	Can meet basic needs with subsidy; appropriate spending.	Can meet basic needs and manage debt without assistance.	Income is sufficient, well-managed; has discretionary income and is able to save.
4. Food and Nutrition	No food or means to prepare it. Relies to a significant degree on other sources of free or low-cost food.	Household receives SNAP benefits.	Can meet basic food needs, but requires occasional assistance.	Can meet basic food needs without assistance.	Can choose to purchase any food household desires. Makes healthy choices.
5. Childcare	Needs childcare, but none is available/accessible and/or child is not eligible.	Childcare is unreliable or unaffordable, inadequate supervision is a problem for childcare that is available.	Affordable subsidized childcare is available, but limited.	Reliable, affordable childcare if available, no need for subsidies.	Able to select quality childcare of choice.
6. Children’s Education	One or more school-aged children not enrolled in school.	One or more school-aged children enrolled in school, but not attending classes.	Enrolled in school but one or more children only occasionally attending classes.	Enrolled in school and attending classes most of the time.	All school-aged children enrolled and attending on a regular basis.
7. Adult Education	Literacy problems and/or no high school diploma/GED are serious barriers to employment.	Enrolled in literacy and/or GED program and/or has sufficient command of English to where language is not a barrier to employment.	Has high school diploma/GED.	Needs additional education to improve employment and/or to resolve literacy problems to where they are able to function effectively in society.	Has completed education/training needed to become employable. No literacy problems.
8. Health Care	No medical coverage with immediate need	No medical coverage and/or great difficulty accessing medical card when needed. Client may be in poor health.	Client on publicly provided health plan.	Client can get medical care when needed, but may strain budget.	Client is covered by affordable, adequate health insurance.

9. Life Skills	Unable to meet basic needs such as hygiene, food, activities of daily living.	Can meet a few but not all needs of daily living without assistance.	Can meet most but not all daily living needs without assistance.	Able to meet all basic needs of daily living without assistance.	Able to provide beyond basic needs of daily living for self and family.
10. Family Relations/Support Network	Lack of necessary support from family or friends; abuse (DV, Child) is present or there is child neglect.	Family/friends may be supportive, but lack ability or resources to help; family members do not relate well with one another; potential for abuse or neglect.	Some support from family/friends; family members acknowledge and seek to change negative behaviors; are learning to communicate and support.	Strong support from family or friends. Household members support each other's efforts.	Has healthy/expanding support network; household is stable, and communication is consistently open.
11. Transportation and Mobility	No access to transportation, public or private; may have car that is inoperable.	Transportation is available, but unreliable, unpredictable, unaffordable, may have car but no insurance, license, etc.	Transportation is available and reliable, but limited and/or inconvenient; drivers are licensed and minimally insured.	Transportation is generally accessible to meet basic travel needs.	Transportation is readily available and affordable; car is adequately insured.
12. Community Involvement	Not application due to crisis situation; in "survival" mode.	Socially isolated and/or no social skills and/or lacks motivation to become involved.	Lacks knowledge of ways to become involved.	Some involvement (advisory group, support group), but has barriers e.g. childcare, transportation.	Actively involved in the community.
13. Parenting Skills	There are safety concerns regarding parenting skills.	Parenting skills are minimal.	Parenting skills are apparent but not adequate.	Parenting skills are adequate.	Parenting skills are well developed.
14. Legal	Current outstanding tickets or warrants.	Current charges/trial pending, noncompliance with probation/parole.	Fully compliant with probation/parole terms.	Successfully completed probation/parole within past 12 months, no new charges filed.	No active criminal justice involvement in more than 12 months and/or no felony criminal history.
15. Mental Health	Danger to self or others; recurring suicidal ideation; experiencing severe difficulty in day-to-day life due to psychological problems.	Recurrent symptoms that may affect behavior, but not a danger to self/others; persistent problems with functioning due to mental health symptoms.	Mild symptoms may be present but are transient; only moderate difficulty in functioning due to mental health problems.	Minimal symptoms that are expectable responses to life stressors; only slight impairment in functioning.	Symptoms are absent or rare; good or superior functioning in wide range of activities; no more than everyday problems or concerns.
16. Substance Abuse	Meets criteria for severe abuse/dependence; resulting problems so severe that institutional living or hospitalization may be necessary.	Meets criteria for dependence; preoccupation with use and/or obtaining drugs/alcohol; withdrawal or withdrawal avoidance behaviors evident; use results in avoidance or neglect of essential life activities.	Used within last 6 months; evidence of persistent recurrent social, occupational, emotional, or physical problems related to use (disruptive behavior or housing problems); problems have persisted for at least one month.	Client has used during last 6 months, but no evidence of persistent or recurrent social, occupational, emotional, or physical problems related to use; no evidence of recurrent dangerous use.	No drug use/alcohol abuse in last six months.

17. Safety	Home or residence is not safe; immediate level of lethality is extremely high; possible CPS involvement.	Safety is threatened/temporary protection is available, level or lethality is high.	Current level of safety is minimally adequate; ongoing safety planning is essential.	Environment is safe, however, future of such is uncertain; safety planning is important.	Environment is apparently safe and stable.
18. Disabilities	In crisis – acute or chronic symptoms affecting housing, employment, social interactions, etc.	Vulnerable – sometimes or periodically has acute or chronic symptoms affecting housing, employment, social interactions, etc.	Safe – rarely has acute or chronic symptoms affecting housing, employment, social interactions, etc.	Building capacity – asymptomatic – condition controlled by services or medication.	Thriving – no identified disability.
19. Financial Management	Bankruptcies, foreclosures, evictions.	Outstanding judgements, garnishments.	Aware of credit score, needs a credit repair plan.	Moderate budgeting skills, has bank account but no savings plan.	Manageable budget and ability to save, bank account.

- E. PARTNER ORGANIZATIONS.** ResCare and Workforce Essentials have developed a network of partners and community organizations to fit the needs of a variety of clients in eliminating and alleviating barriers to success. There are over 40 DHS approved work experience sites with partners within the area. Both organizations develop a series of core activities that follow the Two-Gen approach to success. Education, labor market information, health and wellbeing, social capital, face to face engagement throughout the process are key pillars and partnerships that are delivered to the customer to assist them into moving forward in their career pathway. The core activities and strategies delivered and offered to the client are Job Search assistance, Work Experience, Vocational Education training, Community Service, Unsubsidized Employment, Adult Education and Direct Job skills training.
- F. CO-ENROLLMENTS.** The following Co Enrollment numbers have been tracked for the first quarter in Northern Middle TN with the Title I program: Wagner Peyser 904, Adult Education 155, RESEA 73, TAA 45, TANF 4, SNAP 28, Job Corps 2, VR 13, Veterans Vocational Rehab 3, and Vocational Education 1. A description of services of existing and new partners are found in the AJC MOU and IFA.
- G. BARRIERS INCARCERATION.** The barriers listed in D above for the TANF recipients are similar in scope to those whom are incarcerated. The major difference for those being released from incarceration is the barrier to re-acclimate to civilian life and the general freedoms allowed. The barriers to re-entry are also slightly different economically because many owe court costs and many have had personal vehicle licensing revoked and thus public transportation may be their only option for mobility. The NMTLWDB has initiated programs with County detention facilities such as the one located in Robertson County to conduct Adult Education classes within the facility resulting in numerous HISET diplomas over the past two years. In Sumner County, the AJC staff has worked with local companies to set up a work release program when nonviolent felons near the last quarter of their sentencing. They are released daily and are sent to work with companies such as the Gap and O’Charleys. In Williamson County, AJC Title I staff are providing workshops in the detention

facility on 'work readiness' as well as providing job search assistance to soon to be released inmates.

- H. **COLLABORATION WITH NEW PARTNERS.** There are numerous potential opportunities to expand on collaboration with partners and community based organizations. The realignment of the two local workforce areas to create the Northern Middle has created opportunities to share best practices from both areas that the other legacy area had not had strong connections in the past. Goodwill in Nashville has been providing youth services that could be expanded upon throughout the 13 county area. The relationship with the Robertson County detention facility can prove to other jail administrators that 'it can be done' to deliver high quality education within the prison system resulting in diplomas. The MOU process now allows the partners to share PII on customers to include current data and transcripts, as well as information on work experience without having to duplicate the service or duplicate the gathering of the information.
- I. **BRAIDING RESOURCES.** The one stop delivery system of the 12 American Job Centers in the Northern Middle Tennessee Local Workforce Development Area provides integrated service delivery by aligning all AJC partners into functional teams that are cross-trained via the One Stop Operator. Funding is braided in Davidson County with WIOA youth funds and Davidson County's Opportunity Now youth program targeting at risk youth within Nashville. Opportunity NOW is Nashville's youth employment initiative, working to provide young people in Davidson County access to employment. In Nashville, fewer teenagers and young adults are working during the summers and after-school. At the same time, Nashville employers across various industries are concerned about the lack of "soft" skills among their youngest employees—skills most readily learned through actual work experience. Helping to implement the Mayor's initiative is the Nashville Career Advancement Center (NCAC), a division of the Mayor's Office and staff to the NMTLWDB. Here WIOA and city funding are leveraged to achieve work goals for youth. Funding and referrals are also leveraged throughout via the MOU agreement signed by all partners. The MOU and the Infrastructure Agreement are reviewed quarterly. The MOU is utilized to facilitate flexible and transparent agreements to ensure that all customers are referred to unique services and provides the process so that all partners can participate. Shared costs are identified for partners and proportionately determined. For example, TANF may pay a milestone incentive, while Title I pays transportation to Adult Ed while VR provides assistance with the individuals eyesight disability. The customer receives the services without realizing numerous agencies and funding is assisting them via a wide array of resources.
- J. **LEVERAGING RESOURCES.** Individuals needing assistance from the AJC partners arrive at the welcome desk and sign in electronically via the VOS greeter system. There, they will enter some individual data prior to the Welcome team beginning to triage the person to ensure all of the assistance necessary is brought to bear in assisting them into a successful career plan. An individual who is homeless may be referred to a specific church group in a community to provide temporary shelter or if a homeless veteran enters, they may be referred to Operation Stand-down. Non-custodial parents may be referred to TANF for

assistance and later entered in to their Gen-Two Programs. Personnel with disabilities could be assisted by the DVOP, the Ticket to Work representative, Vocational Rehabilitation or possibly all three agencies.

- K. **SECTOR PATHWAY.** TANF partners such as ResCare and Workforce Essentials provides intensive educational guidance utilizing Career Pathways and local labor market data to determine a clear educational path for the participant. Career Coaches assist the client in completing FAFSA and accessing Tennessee Reconnect as well as Drive to 55 assistance to cover the cost of education. Workforce Essentials provides the public assistance client with a support system to enroll in the school of their choice that will allow them to successfully begin their advancement on a career pathway that is in-demand. The AJC hosts weekly job fairs to connect the participant to the world of work and the options to a variety of working environments. Support services are available to eliminate barriers ranging from assistance with glasses, to car repair, to interview and work clothing to childcare.
- L. **SUPPORTIVE SERVICES.** There are support service policies in place via ResCare and Workforce Essentials under Title 1 and TANF that are tailored for eliminating barriers to employment as well as assisting in education goals. An example of a common barrier is transportation. In a rural community, there may be no public transportation system so support is provided either through distribution of a gas card or coordination in utilizing the Mid Cumberland van and transportation service. Mid Cumberland is an important partner tied to the AJC system. In an urban community such as Nashville or Clarksville, a widespread public transportation system exists. Customers there will receive bus passes and guidance on how to access routes for attending education classes, work experience sites, or On-The-Job training sites.
- M. **RETAIN PUBLIC ASSISTANCE CUSTOMERS.** The Families First/TANF contractor partners of ResCare and Workforce Essentials assign a Career Coach to each client. They build a long-term relationship together as they navigate the client's career pathway. One of the more important and effective tools to ensure the client remains in touch and continues enacting the plans for self-sufficiency is through an incentive program. As the client completes their high school education, or receives a post-secondary certificate, or retains full time employment or has their FF/TANF case successfully closed within six months, a sizeable incentive is awarded to the client. This concept has proven highly successful for keeping those on public assistance on track and focused on their career goal.
- N. **MODIFICATION OF SERVICES.** As the economy continues to grow, fewer clients are on public assistance and if the economy takes a downturn, the Board expects to see a rise in requests for assistance. Partners such as the Department of Human Services prepare for those options through monitoring labor market information and economic trends. As the labor market shifts, resources and manpower are placed to meet the needs of the communities within the Northern Middle 13 Counties. The AJC system then adjusts the AJC MOU process to reflect that and is mirrored in the IFA as well. Additional, the number of TANF Career

Coaches may change from year to year. Partners will adjust accordingly under the Boards guidance, and Northern Middle will be flexible to ensure seamless delivery.

PERFORMANCE

A. **SERVICE LEVELS.** The Northern Middle Tennessee Local Workforce Development Board strives to remain the highest performing workforce area within the state. It does so through strong partnerships, a clear vision focused on business and job seekers while leveraging resources from stakeholders and partners. The Board, as well as the Chief Local Elected Official agreed at its meeting in November 2018 to adopt the state performance goals listed below and are on track of exceeding them through analysis of first quarter metrics.

B. MEASURES.

Adult		
<i>Federal Performance Indicator</i>	<i>Agreed upon outcome PY 2018</i>	<i>Agreed upon outcome PY 2019</i>
Employment Rate 2nd Quarter After Exit	83.0%	83.5%
Employment Rate 4th Quarter After Exit	83.0%	83.5%
Median Earnings 2nd Quarter After Exit	\$6,633	\$6,650
Credential Attainment within 4 Quarters After Exit	58.0%	59.0%
Measurable Skill Gains		
Dislocated Worker		
<i>Federal Performance Indicator</i>	<i>Agreed upon outcome PY 2018</i>	<i>Agreed upon outcome PY 2019</i>
Employment Rate 2nd Quarter After Exit	81.0%	82.0%
Employment Rate 4th Quarter After Exit	81.0%	82.0%
Median Earnings 2nd Quarter After Exit	\$6,900	\$7,000
Credential Attainment within 4 Quarters After Exit	68.5%	69.0%
Measurable Skill Gains		
Youth		
<i>Federal Performance Indicator</i>	<i>Agreed upon outcome PY 2018</i>	<i>Agreed upon outcome PY 2019</i>
Employment or Ed. Enrollment Rate 2nd Quarter After Exit	79.0%	79.5%
Employment or Ed. Enrollment Rate 4th Quarter After Exit	75.0%	76.0%
Median Earnings 2nd Quarter After Exit	NA	NA
Credential Attainment within 4 Quarters After Exit	70.0%	72.0%
Measurable Skill Gains		

TECHNICAL REQUIREMENTS ASSURANCES AND EVALUATION

- A. INTEGRATE TECHNOLOGY.** The Board through its network of 13 American Job Centers utilizes the state web based Virtual One Stop (VOS) system for comprehensive information gathering and reporting. Each center is set with a VOS Greeter to track the numbers of clients visiting the AJC system. The One Stop Operator then conducts monthly analysis of traffic flow, timely service, and services rendered via staff, and other means to leverage internal office resources to meet needs of current and future customers. The OSO then develops a dashboard based on VOS data and reports monthly with Quarterly wrap-ups to the Board for center traffic reports and activities. The VOS system currently tracks Title I-III, UI, TRA, TAA, CBG, and SCSEP customers. The VOS system is currently expanding and additional partners and capabilities are being added each quarter via the Department of Labor. The Boards current Performance Manager is a field consultant to the state for VOS data updates and testing, thus the Board has firsthand knowledge of new and upcoming capabilities. All centers are electronically linked and data and reports are run via the Performance Manager of the Board to update committees and LEO official requests. The Mobile Career Coach, when utilized, also shares data of services rendered into VOS for tracking and resource placement by the Northern Middle Board as needed.
- B. PHYSICAL ACCESSIBILITY.** All American Job Centers have been certified by the state Department of Labor and Workforce Development as well as the State Workforce Board. The certification requires an extensive evaluation via state Policy 18-3 that requires an accessibility evaluation by a Vocational Rehabilitation Representative who conducts a thorough analysis of physical accessibility of the building as well as accessibility to resources and disability training to staff. VR is represented on the NMTLWDB as well as being a physical partner in each of the four Comprehensive Centers. Of the 26-page certification checklist, two full pages are devoted to accessibility based upon WIOA SEC 188, and all centers have passed certification as well as the external VR inspection. Additionally, the Board is an Employment Network in the Ticket to Work Program and additional expertise is available at the Comprehensive Centers to assist those with disabilities. The Employment Network staff conduct spot training to other staff partners on such areas as disability etiquette. DVOP staff are available throughout the system to assist veterans with disabilities. An array of electronic devices are available for those with some physical disabilities to better access information, assistance and educational opportunities.
- C. FISCAL MANAGEMENT.** The North Tennessee Workforce Board, Inc. (NTWB), now doing business as, the Northern Middle Tennessee Local Workforce Development Board, Inc. (NMTLWDB), was selected by the Chief Local elected Official via the Interlocal Agreement as the Fiscal Agent and Administrative Entity for the Board and to act as the sub recipient. The Fiscal Agent has signed the agreement and understands the responsibilities and liabilities of the role as the sub recipient as described in WIOA Section 107(d)(12)(B)(I)(II). All contacts between the CLEO and Fiscal Agent have clear defined roles and responsibilities and follow the functions of 20CFR679.420. The NMTLWDB follows the procurement of goods and services obtained with WIOA funds, as set forth in the requirements provided by the Office

of Management and Budget, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards Final Rule Title 2 of the Code of Federal Regulations 2CFR200. The attached Procurement Policy is the guidance followed by the NMTLWDB and will remain consistent with WIOA sections 107 and 121 as well as being in agreement with the CLEO in his selection of the One Stop Operator and the Title 1 Career Service Providers. The NMTLWDB will issue a Request for Proposal to a Third Party Administrator (TPA) to conduct the outreach and handle proposals for the Board's One Stop Operator and Career Service Provider. This will hold the Board initially at "Arm's Length" from the process to ensure all proposers have similar competitive access to apply to serve the businesses and job seekers within the 13 county area. The RFP, handled by the TPA, will follow guidelines of the procurement policy as well as WIOA section 121 and applicable TN sunshine laws and state policies. The selected contractors by the Board will enter into contracts with the Fiscal Agent. The current MPCR for Northern Middle Tennessee Local Workforce Development Area for the first quarter was over 43% and currently is over 50%. The Board, via the One Stop Operator and Career Services Provider continues to track this monthly and reports outcomes to the Operations Committee of the Board.

- D. TRANSFERENCE OF FUNDS.** According to WIOA Section 133, the Board may transfer up to 100% of the funds between the Adult allocation and the Dislocated Worker funding allocation. The request to transfer these funds must be based on areas such as, but not limited to; current labor market information, performance data, comparison and analysis of adult priority of service population compared to dislocated workers either long term unemployed or mass layoffs, recruitment efforts within the AJC system or average cost per participant. The transfer request once motioned by the finance and operations committee of the Board then goes to the full Board for approval. The Board can also use no more than 20% of its funds to pay for shared costs of Incumbent Worker trainings according to WIOA section 134(d)(4)(A)(i). For the Board to authorize these funds for Incumbent Worker training the Board takes into account factors such as the employer's competitiveness, characteristics of the employees to be trained, the wage and benefits to the employees and other factors. The guidance the Board uses for Incumbent Worker Training is found in policy 13 of the Board entitled Consolidated Business Grant Policy, which outlines Apprenticeship, OJT and IWT programs that the Board may/may not authorize. The Board utilized this policy during the 2018 year to assist businesses with funding when CBG funding was interrupted at the Federal level as a means to continue middle Tennessee's overall economic development and momentum.
- E. AGREEMENTS.** The Northern Middle Tennessee Local Workforce Development Board maintains the Interlocal Agreement to include Addendum One and Partnership Agreement with the 13 County Mayors/ County Executives. The American Job Center Partners via the MOU and Infrastructure Agreement, its subcontractors as well as the subcontractor agreements such as Mid-Cumberland delivering seamless services to the job seeker as well as business and industry. Cross training of staff in all centers, and information sharing is conducted by the One Stop Operator during their bi-weekly and monthly meetings. An information-sharing example would be a new educational institution or program that was

now providing services within the area after approval of the ETPL would be passed around to all partners.

- F. **TITLE VI.** The One Stop Operator as well as the Career Service Provider staff have attended Title VI training. CSP staff and the OSO staff attended Federal Discrimination Laws training in March of 2018. Members of the NMTLWDB are aware of the requirements to ensure that providers of services throughout the AJC system are trained, but not limited to, areas such as EEO, Conflicts of Interest, and Title VI.