



**Northern Middle Tennessee  
Workforce Board Inc.**

## Special Populations Committee

**May 1, 2025**

**11:00 A.M.**

[Click here for Zoom link](#)

Meeting ID: 811 4303 1360

Passcode: 193133

One tap mobile: +13017158592,,81143031360# US

## Agenda

### Welcome

### Call the Meeting to Order

### Approval of Minutes

### Business Reports:

1. Career Service Provider Performance
  - a. MAC
  - b. EDSI
  - c. Clarksville
  - d. Gallatin
2. Target Populations
  - a. Rural Healthcare
    - i. <https://www.tn.gov/workforce-services-tn/swdb/swdb-strategies/rural-workforce-initiatives.html>
  - b. PROWD Re-entry Grant
    - i. <https://www.tn.gov/workforce/reentrytn/prowd-grant.html>
  - c. Incumbent Worker Training Grant
    - i. <https://yeptn.com/>
  - d. Apprenticeship Training Grant
  - e. Youth Employment Program
3. Career Service Provider Updates
4. AJC Locations

### Adjourn

#### Members:

Corey Johns  
Christopher West  
Freda Herndon (Chair)  
George "Bo" Callis  
James Harper  
Mary Lear  
Nathan Garrett  
Jordan Osborne

**Complete zoom link:** <https://us02web.zoom.us/j/81143031360?pwd=aaGSrNBAV5qt4u23itShqYfwGBDubf.1>



DRAFT UNTIL  
APPROVED

Northern Middle Tennessee Workforce Board  
Special Populations Committee  
Meeting Minutes  
January 30, 2025, via Zoom at 11:00 a.m.

Members Attending	Members Absent	Staff & Guests Attending
Corey Johns	Jordan Osbourne	Marla Rye
Christopher West	James Harper	Andrea Dillard
Freda Herndon		Ginger Fussell
George "Bo" Callis		Meagan Dobbins
Mary Lear		Alyssa Spaulding
Nathan Garrett		Kim Rye
Selina Moore		

The Northern Middle Tennessee Workforce Special Populations Committee met via Zoom on January 30, 2025, at 11:00 a.m.

With a quorum confirmed, Freda Herndon called the meeting to order. Chris West moved to approve the minutes, and Mary Lear seconded. With no further discussion, the minutes were unanimously approved.

#### Career Service Provider Update

Andrea Dillard delivered the CSP performance update. For Q2, MAC narrowly failed to meet their enrollment goals, likely due to the holidays. She has met with MAC, and they are now up to date in January. They have exceeded their cumulative goals in every category except out-of-school youths, at 44% of the 50% goal. They are slightly behind on Q2 exits, but Meagan Dobbins has been working with them to clear out older cases. Exiting them slowly over several quarters is preferable for performance management. EDSI has exceeded their enrollment goals for Adult/DW and youth. They are slightly behind on exits. They have met or exceeded their cumulative goals.

She then reminded the Committee about the pilot projects in the region. For Clarksville, the Board took over as the CSP in October 2024. For their first quarter, they have met or exceeded every goal except youth. For Sumner, the state is in charge of service delivery. For their first quarter, they did not meet their goals. Andrea has been meeting with state leadership every Friday to discuss what needs to be done to improve enrollments and move forward. Chris West congratulated the Clarksville project for their performance and asked if they could give Gallatin

insight. Andrea replied that she believes a significant challenge Sumner faces is staffing. It is a comprehensive center, but one of the region's lowest-staffed AJCs. Additionally, some staff are either entirely new to WIOA or new to the position. Marla added that 3 TDLWD employees were working on the pilot projects in the beginning. Two are no longer there; the other has been pulled onto another project. Freda Herndon asked if the foot traffic had changed in Sumner. Andrea replied that she believes traffic has picked up. It seems to her that Sumner is enrolling to Wagner Peyser, as instructed by the state, but they are not being coenrolled into Title I. Corey Johns asked whether the state or board was responsible for hiring. Andrea answered that hiring was a dual effort, but the state made the final decision. Nathan Garrett then asked if there was anything that partners could do to add value and help with numbers. She replied that they could look at TCAT students and assess them for WIOA eligibility. Freda said that board staff could contact Adult Education to see if co-enrollment opportunities existed. Nathan Garrett expressed interest in introducing staff to the TCAT Portland Campus, and Marla thanked him. Freda Herndon asked about the timeline for evaluating the two pilots with the upcoming new program year. When would decisions for the new RFP be made? Marla answered that she made excellent points that would be answered in the CSP Procurement Update.

### **Target Populations**

The Board was recently awarded a rural healthcare grant. NM will partner with Volunteer State Community College to take advanced EMTs in Cheatham, Robertson, Dickson, and Stewart County and upskill them to paramedics. Marla will be working with EMT agencies in the counties to have interested individuals sign a contract stating that they will receive free tuition and support services while working for their local agencies, similar to an apprenticeship program. Several other organizations within the NM region also received this grant, many of which will partner directly with Northern Middle. She added that another rural healthcare grant is currently accepting applications.

Northern Middle was also awarded a Reentry Opportunities and Workforce Development grant. It primarily targeted the Memphis area but has recently expanded to Davidson County. The Office of Reentry reached out and asked NM to be a part of it. It is too early to know the grant's scope, but since reentry is a large portion of the labor force participation rate, Marla thought it would be advantageous to partner with them. She hopes to know more about the scope of the contract in the March-April timeframe. Nathan Garrett asked to be kept in touch. TCAT has tried to do training classes in the Davidson County system in the past, but they transitioned online during COVID, making it complicated.

Marla then asked Freda Herndon to give an update about the Adult Education diploma report. Q2 ended December 31, 2025, and Workforce Essentials is back to the number one spot in the state for diploma attainment. This was primarily thanks to the flexibility of piecing together the TABE, Hi-Set, and GED tests to help students attain their diplomas with new pathways. It has helped those with different learning styles or less formal education find success. The state did issue a 43% diploma goal increase for the year, which has been a challenge. They are trying a new model at the new Davidson County AJC by dividing staff into ESL or Hi-Set instructors. This

will hopefully allow staff to focus on one specific area of instruction and provide a higher level of service to the student instead of shifting around. Freda hoped that this strategy change will pay off in the long run. Marla added that the state has a goal of 7000 diplomas, but are only at 2321 through 50% of the year. She then asked Freda about the non-grantees on the report. Freda answered that they are entities not funded by the state and have never been tracked. They do this so that state and federal guidelines are not a hinderance.

### **CSP Procurement Update**

Marla delivered the CSP procurement update. EDSI and MAC have been the contracted service providers for 4.5 years. State procurement guidelines only allow a contract to be extended for 5 years without procurement, meaning a contract must be made by July 1, 2025. Considering their performance over time and the fact that they are behind on the participant cost rate for the fiscal year, it is apparent that there are improvements to be made in the service delivery model. Before making any procurement decisions, she would like to talk with County Mayors, Chambers of Commerce, and economic development agencies with workforce components to determine what they would like to see different in the AJCs. She will use that information to craft an RFP to bring the focus back to local service delivery. When NM was the CSP, staff were chamber members or involved in community events. She believes that subcontracting services has led to a loss of "local" presence within the community. Several other areas are beginning to deliver their programs, and Marla thinks that works well in rural communities. However, urban areas need a broader strategy. Thomas P. Miller and Associates were contracted to do an independent procurement during the last procurement, but NM staff were troubled with their commitment and approach. John Zobl offered during the Finance Committee meeting that the RFP be in-house, which is allowable.

Marla then opened the floor to comment. Corey Johns asked if there was an outline for the local-level assessment to guide the conversations. She replied that there was no simplistic guide to the expectations and performance for the AJC, but she had several big-picture points. Chris West added that looking at Clarksville's performance shows that the Board's past experience as a CSP is a good indicator to get the entire area down the right path, even if it is a totally different climate. Freda Herndon asked if Marla had any sense of what the budget for next year might look like, as it may impact the RFP. Ginger Fussell explained that there was some carryover and additional grants, bringing last year's allocation to approximately \$8 million. As a precaution, she plans for a 10% reduction each year. Typically, they receive an estimate in March, with the official announcement in May. Marla noted that, through the CSPs, expenditures are behind the expected timeline. However, she reassured that there is no risk of losing the funds, as allocations have a two-year spending window, and they always prioritize using the funds within that period. While they will meet this requirement again this year, she expects a larger carryover than usual unless spending picks up in Q3 and Q4. That said, she does not view this as a negative, especially given the uncertainty surrounding the federal government and the new administration. Freda Herndon asked what urban counties, aside from Davidson, she is considering having a different delivery model. Marla answered that there is no one-size-fits-all. Administratively, it would be much easier to deal with 1-2 contractors, but

that may not be what is best for service delivery. They will have to determine the benefits and risks of selecting multiple contractors.

### **Adjourn**

Marla Rye introduced Selena Moore as the newest member of the NM board. She has been with the Department of Labor for over 20 years and serves on the Southern Middle Workforce Board. She is replacing Ryan Jolley. Marla then reminded that the Board meeting will be held on February 12, 2025, at the Montgomery AJC. With no further discussion, the meeting was adjourned.

**WIOA Federal Reporting Score Card  
NORTHERN MIDDLE WORKFORCE BOARD**

PY24 WIOA Core Performance Measures	Targets 100%	Targets 90%					
			Q1 PY 24	Q2 PY 24	Q3 PY 24	Q4 PY 24	
Adult Measures			PASS	PASS	EST	EST	
Exiters			528	496			
Participants Served			1969	1997			
Employment Rate 2nd Quarter after exit	84.1%	75.69%	81.5%	84.1%	83.2%	82.7%	
Employment Rate 4th Quarter after exit	83.8%	75.42%	77.7%	78.0%	79.2%	82.2%	
Median Earnings 2 <sup>nd</sup> Quarter after exit	8,500	\$ 7,650	\$ 9,060	\$ 9,770	\$ 10,088	\$ 9,938	
Credential Attainment w/in 4 Quarters after exit	74.0%	66.60%	67.6%	66.7%	70.5%	76.7%	
Measurable Skills Gains	72.3%	65.07%	67.5%	66.1%	66.1%	68.0%	
Dislocated Worker			PASS	PASS			
Exiters			242	316			
Participants Served			751	760			
Employment Rate 2nd Quarter after exit	86.4%	77.76%	83.7%	88.0%	88.1%	86.6%	
Employment Rate 4th Quarter after exit	86.0%	77.40%	79.0%	82.0%	80.7%	85.2%	
Median Earnings 2 <sup>nd</sup> Quarter after exit	10,500	\$ 9,450	\$11,348	\$11,931	\$12,500	\$12,741	
Credential Attainment w/in 4 Quarters after exit	69.1%	62.19%	69.7%	68.7%	70.0%	67.4%	
Measurable Skills Gains	73.9%	66.51%	71.1%	72.9%	82.4%	84.5%	
Youth			PASS	PASS			
Exiters			510	511			
Participants Served			1084	1051			
Employment Rate 2nd Quarter after exit	87.6%	78.84%	81.8%	81.0%	78.9%	80.6%	
Employment Rate 4th Quarter after exit	85.3%	76.77%	82.0%	79.1%	77.0%	79%	
Median Earnings 2 <sup>nd</sup> Quarter after exit	6,000	\$ 5,400	\$ 5,820	\$ 5,626	\$ 5,625	\$ 5,549	
Credential Attainment w/in 4 Quarters after exit	75.3%	67.77%	71.7%	75.6%	71.6%	78.3%	
Measurable Skills Gains	61.5%	55.35%	58.9%	56.3%	56.0%	50.9%	
GREEN-Passing at 100% of Goal							
YELLOW-Passing at 90% of goal							
Red-Failing at less than 90% of goal							

MAC Goals 2024 2025													
Matrix:		2024						2025					
		Sep 30 (QTR 1)			Dec. 30 (QTR 2)			Mar. 31 (QTR 3)			Cumulative June 30		
		Goal	Actual	%	Goal	Actual	%	Goal	Actual	%	Goal	Actual	%
Enrollments	ISY	36	36	100%	23	21	91.30%	18	20	111.11%	80	77	96.3%
	OSY	14	14	100%	18	15	83.33%	18	21	116.67%	65	50	76.9%
	Total	50	50	100%	41	36	87.80%	36	41	113.89%	145	127	87.6%
Exits													
	Youth	40	68	170%	33	25	76.22%	29	16	55.56%	116	112	96.6%
Positive Exits (85%)		Goal		Percent	Goal		Percent	Goal		Percent	Goal		Percent
	Youth	34	53	155.9%	28	17	61.0%	24	14	57.19%	99	84	85.2%
**Actual Positive Exit Rate (80%)													
		Exits		Percent	Exits		Percent	Exits		Percent	Exits		Percent
		68	53	77.9%	25	17	68.0%	16	14	87.50%	112	84	75.0%
Placement Wage													
	Youth	\$ 13.00	\$ 16.17	124.4%	\$13.00	\$16.52	127.1%	\$ 13.00	\$ 16.89	129.9%	\$13.00	\$ 16.23	124.8%

### EDSI 24-25 Quarterly Benchmarks

Matrix:		2024						2025					
		Sep 30 (QTR 1)			Dec. 30 (QTR 2)			Mar. 31 (QTR 3)			Cumulative June 30		
		Goal	Actual	%	Goal	Actual	%	Goal	Actual	%	Goal	Actual	%
Enrollments	A/DW	250	358	143.20%	200	257	128.50%	200	321	160.50%	850	936	110.1%
	Total Youth	81	65	80.25%	50	57	114.00%	50	75	150.00%	231	197	85.3%
	In-School		21			17							
*Exits (80% of enrollments)	A/DW	200	159	79.50%	160	109	68.13%	160	253	158.13%	680	624	91.8%
	Youth	65	59	91.05%	40	23	57.50%	40	35	87.50%	185	146	79.0%
Positive Exits # (85% of Exits)		Goal		Percent	Goal		Percent	Goal		Percent	Goal		Percent
	A/DW	170	136	80.00%	136	107	78.7%	136	240	176.5%	578	560	96.9%
	Youth	55	55	99.85%	34	23	67.6%	34	34	100.0%	157	130	82.8%
		Exits		Percent	Exits		Percent	Exits		Percent	Exits		Percent
** Actual Positive Exit Rate	A/DW	159	136	85.53%	109	107	98.2%	253	240	94.9%	624	560	89.7%
Goal 80%	Youth	59	55	93.22%	23	23	100.0%	35	34	97.1%	146	130	89.0%
		Goal		Percent	Goal		Percent	Goal		Percent	Goal		Percent
Placement Wage	A/DW	\$ 16.50	\$ 21.35	129.39%	\$ 16.50	\$ 20.90	126.7%	\$ 16.50	\$ 21.29	129.0%	\$ 16.50	\$ 21.37	129.5%
	Youth	\$ 13.00	\$ 16.34	125.69%	\$ 13.00	\$ 16.44	126.5%	\$ 13.00	\$ 16.24	124.9%	\$ 13.00	\$16.19	124.5%



Clarksville Pilot 24-25 Quarterly Benchmarks										
Matrix:		2025								
		Dec. 30 (QTR 2)			Mar. 31 (QTR 3)			Cumulative June 30		
		Goal	Actual	%	Goal	Actual	%	Goal	Actual	%
Enrollments	A/DW	30	34	113.33%	30	46	153.33%	90	80	88.9%
	Total Youth	12	9	75.00%	12	10	83.33%	36	19	52.8%
*Exits (80% of enrollments)	A/DW	24	37	154.17%	24	122	508.33%	72	196	272.2%
	Youth	9	14	155.56%	9	37	411.11%	27	53	196.3%
		Goal		Percent	Goal		Percent	Goal		Percent
Positive Exits # (85% of Exits)	A/DW	20	31	152.0%	20	107	524.5%	61	143	233.7%
	Youth	8	13	169.9%	8	34	444.4%	23	48	209.2%
		Exits		Percent	Exits		Percent	Exits		Percent
**Actual Positive Exit Rate	A/DW	37	31	83.8%	122	107	87.7%	196	143	73.0%
Goal 80%	Youth	14	13	92.9%	37	34	91.9%	53	48	90.6%
		Goal		Percent	Goal		Percent	Goal		Percent
Placement Wage	A/DW	\$ 16.50	\$ 21.81	132.2%	\$ 16.50	\$ 21.29	129.0%	\$ 16.50	\$ 20.03	121.4%
	Youth	\$ 13.00	\$ 19.23	147.9%	\$ 13.00	\$ 15.26	117.4%	\$ 13.00	\$ 16.15	124.2%

Gallatin Pilot 24-25 Quarterly Benchmarks										
Matrix:		2025								
		Dec. 30 (QTR 2)			Mar. 31 (QTR 3)			Cumulative June 30		
		Goal	Actual	%	Goal	Actual	%	Goal	Actual	%
Enrollments	A/DW	15	7	46.67%	15	18	120.00%	45	25	55.6%
	Total Youth	10	1	10.00%	10	5	50.00%	30	6	20.0%
				#DIV/0!						
*Exits (80% of enrollments)	A/DW	12	0	0.00%	12	10	83.33%	36	16	44.4%
	Youth	8	4	50.00%	8	3	37.50%	24	8	33.3%
Positive Exits # (85% of Exits)	Goal			Percent	Goal		Percent	Goal		Percent
	A/DW	10	-	0.0%	10	8	78.4%	31	8	26.1%
	Youth	7	1	14.7%	7	3	44.1%	20	4	19.6%
	Exits			Percent	Exits		Percent	Exits		Percent
**Actual Positive Exit Rate	A/DW	0	-	0.0%	10	8	80.0%	16	8	50.0%
Goal 80%	Youth	4	1	25.0%	3	3	100.0%	8	4	50.0%
	Goal			Percent	Goal		Percent	Goal		Percent
Placement Wage	A/DW	\$ 16.50	\$ -	0.0%	\$ 16.50	\$ 21.50	130.3%	\$ 16.50	\$ 20.93	126.8%
	Youth	\$ 13.00	\$ 7.25	55.8%	\$ 13.00	\$ 11.63	89.5%	\$ 13.00	\$ 12.75	98.1%

## Northern Middle Program Year July 1, 2023 to June 30, 2024

### Incumbent Worker Training (IWT) Grants (07.01.2024 - 06.30.2025)

	County Location	Employer	UEI	Employees Trained	Contract Start Date	Contract End Date	Contract Amount	Amount Expended
1	Sumner	Clarendale @Indian Lake	SR6UG96MEP53	15	08.01.2024	05.31.2025	\$25,000.00	\$6,861.63
2	Davidson	Coca-Cola Consolidated, Inc	EVMRM7AZGAC6	30	09.01.2024	05.31.2025	\$21,694.00	
3	Rutherford	Fessler & Bowman	NYPLTSQU9BB5	50	08.01.2024	05.31.2025	\$24,922.00	
4	Davidson	Military Systems Group	SBYBHNZL5UJ1	12	08.01.2024	05.31.2025	\$24,948.00	
5	Sumner	The GAP	ZYZJX5WLT3M9	54	09.01.2024	05.31.2025	\$12,213.00	\$6,583.50
6	Davidson	Vanderbilt University Medical Center	GYLUH9UXHDX5	94	08.01.2024	05.31.2025	\$25,000.00	
7	Rutherford	Schwan Cosmetics USA	W6DTG8ZMBH93	47	08.01.2024	05.31.2025	\$12,195.00	
8	Davidson	Glatfelter	VYHULQ7RCMA4	10	10.14.2024	05.31.2025	\$5,000.00	
9	Wilson	Solaren Risk Management, LLC	VWBAAWEAJP23	35	10.14.2024	05.31.2025	\$25,000.00	\$25,000.00
10	Rutherford	Roscoe Brown, Inc	FXDHCW7M9F61	28	11.01.2024	05.31.2025	\$25,000.00	
11	Davidson	Nashville Boss Inc.	X4XMG5ECRVY5	10	11.18.2024	05.31.2025	\$22,500.00	\$20,365.80
12	Rutherford	Wiregrass Construction Company	Y2NNK2T8DSL5	2	12.12.2024	05.31.2025	\$8,120.00	\$8,120.00
13	Montgomery	Signature Healthcare of Clarksville	XXN1SAPGW4V6	8	01.02.2025	05.31.2025	\$15,000.00	
14	Houston	Signature Healthcare of Erin	EHCXLMJ53DF3	8	01.02.2025	05.31.2025	\$15,000.00	
15	Sumner	Signature Healthcare of Portland	J9CXUEDFLZR7	8	01.02.2025	05.31.2025	\$15,000.00	
16	Sumner	Westmoreland Care & Rehab Center	JA1UVGMFRB57	8	01.02.2025	05.31.2025	\$15,000.00	
17	Sumner	Dorman Products, Inc.	R6BMHC43K7K5	4	01.02.2025	05.31.2025	\$5,500.00	
18	Rutherford	Gallagher Guitar Co, LLC	TQAMCY7W7ZH6	8	02.03.2025	05.31.2025	\$4,160.00	
				<b>431</b>			<b>\$301,252.00</b>	<b>\$38,445.13</b>

*Board designated funds available: \$ 300,000.00*

### Apprenticeship Training Grants (09.03.2024 - 06.30.2025)

	County Location	Employer	UEI	Employees Trained	Contract Start Date	Contract End Date	Contract Amount	Amount Expended
1	Davidson	Dixon Management Group LLC	UVCJJH9SV2V3	9	10.14.2024	05.31.2024	\$22,500.00	
2	Davidson	Classic Handyman Company, Inc.	PLMNU6JEDTW9	1	10.14.2024	05.31.2025	\$2,500.00	\$2,500.00
3	Rutherford	Roscoe Brown, Inc	FXDHCW7M9F61	7	10.01.2024	05.31.2025	\$17,500.00	\$17,500.00
4	Cheatham	Industrial Electrical Services, Inc.	MEMXUJNDRAR8	4	10.14.2024	05.31.2025	\$9,000.00	\$9,000.00
5	Montgomery	Clarksville Montgomery Co Schools	QM24BH3KM7W7	29	10.14.2024	05.31.2025	\$43,500.00	
6	Rutherford	Cultivation Network	X7B4WU2WPA59	2	10.01.2024	05.31.2025	\$5,000.00	\$2,500.00
7	Davidson	Strings for Hope	TCPHL73T1KR8	5			\$12,500.00	\$12,500.00
8	Montgomery	CDE Lightband	Q8H1FN7FE733	6	12.2.2024	05.31.2025	\$13,000.00	\$13,000.00
9	Dickson	NHC		7	01.21.2025	05.31.2025	\$16,500.00	
10								
				<b>70</b>			<b>\$142,000.00</b>	<b>\$57,000.00</b>

*State Apprenticeship Grant Amount Available: \$142,000.00*

State Apprenticeship Expansion Formula Grant (10.01.2024 - 06.30.2025)									
	County Location	Employer	UEI	Employees Trained	Employment Sector	Contract Start Date	Contract End Date	Contract Amount	Amount Expended
1	Robertson	Robertson Co BOE	L54YG2NQ33U9	20	Teachers	10.01.2024	05.31.2025	\$50,000.00	
2	Rutherford	Rutherford Co BOE	JTUXFTXFMWYZ	10	Teachers	10.01.2024	05.31.2025	\$25,000.00	\$25,000.00
3	Wilson	Lebanon Fire Dept.	LXC9BK GMC3X4	10	EMTs	01.02.2025	05.31.2025	\$25,000.00	
4	Williamson	Bauren Solutions	DV51J21K1QQ3	5	Cabinet Manufacturers		05.31.2025	\$12,500.00	\$12,500.00
5									
6									
7									
8									
9									
10									
								\$112,500.00	\$37,500.00
SAEF Program Funds Available: \$112,500.00									



**State of Tennessee**  
**Department of Labor and Workforce Development**  
**Division of Workforce Services**  
220 French Landing Drive  
Nashville, TN 37243-1002  
(615) 741-1031

April 11, 2025

Northern Middle Local Workforce Development Board  
523 Madison Street, Suite A  
Clarksville, TN 37040

Dear Mr. Zobl,

Thank you for your continued partnership and dedication to the workforce system in the Northern Middle Local Workforce Development Area.

Following our conditional approval letter dated April 2<sup>nd</sup>, 2025, Workforce Services (WFS) has reviewed the materials submitted by the Northern Middle Local Workforce Development Board (NMLWDB) in response to the outlined conditions. We are pleased to confirm that all conditions have been satisfactorily met.

Accordingly, WFS grants full approval for the NMLWDB to serve as its own Career Service Provider (CSP) for Title I services and as its own One-Stop Operator (OSO), beginning on July 1<sup>st</sup>, 2025, in accordance with the implementation timeline provided. Your efforts to establish clear firewalls, ensure independent oversight, and comply with federal and state regulations have been recognized and are appreciated.

Thank you for your commitment to serving Tennesseans through a transparent, compliant, and effective workforce development system. We look forward to continued collaboration in advancing access to high-quality services across the region.

If you have any questions or require further guidance, please do not hesitate to reach out.

Sincerely,

  
Jason Cecil (Apr 11, 2025 10:17 CDT)

Jason Cecil, Workforce Services Assistant Commissioner



**State of Tennessee**  
**Department of Labor and Workforce Development**  
**Division of Workforce Services**  
220 French Landing Drive  
Nashville, TN 37243-1002  
(615) 741-1031

April 02, 2025

Northern Middle Local Workforce Development Board  
523 Madison Street, Suite A  
Clarksville, TN 37040

Dear Mr. Zobl,

Following a thorough review of your request for the Northern Middle Local Workforce Development Board (NMLWDB) to serve as its own Career Service Provider (CSP) for Title I services, Workforce Services (WFS) has conditionally approved this request. This approval is contingent upon the fulfillment of specific regulatory requirements and the implementation of enhanced firewalls to prevent conflicts of interest and ensure compliance with federal guidelines.

**Conditions for Approval:**

1. Procurement Process Compliance
  - In accordance with 2 CFR § 200.320(c), noncompetitive procurement is only permissible under specific circumstances. The NMLWDB must submit a formal written request for a procurement waiver, justifying the absence of competition, and obtain written approval from the appropriate federal or pass-through entity.
2. Conflict of Interest and Oversight Mechanisms
  - To ensure compliance with 20 CFR § 679.410 and 20 CFR § 679.430, NMLWDB must enhance its firewall measures by addressing the following concerns:
    - a. Oversight of the Career Service Provider (CSP)
      - The NMLWDB currently plans to monitor Workforce Essentials, Inc. (WFE), its designated CSP. Given that NMLWDB staff have affiliations with WFE, additional safeguards must be in place to ensure objective oversight.
      - *Suggested Action:* Implement an independent third-party monitor to oversee programmatic compliance and performance, ensuring impartial review and corrective action as needed.
    - b. Relationship Between Fiscal Agent and CSP
      - WFE is designated as both the Fiscal Agent and the CSP, creating a potential conflict in financial oversight.
      - *Suggested Action:* Strengthen financial oversight mechanisms, including periodic state reviews or stricter financial approval processes, to ensure unbiased fund allocation.
    - c. Role of the Independent One-Stop Operator (OSO)
      - The OSO currently reports to the NMLWDB Chair or designee, with oversight from NMLWDB staff, which may not provide sufficient independence.

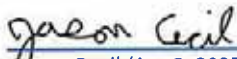
- *Suggested Action:* Restructure the OSO's reporting structure to report directly to the full Board or another independent entity to ensure neutrality in oversight.
- d. Independence of Third-Party Compliance Monitoring
  - It is unclear who will procure and oversee the independent third-party monitor. If this responsibility remains with the NMLWDB or WFE, there is a potential conflict of interest.
  - *Suggested Action:* The State Workforce Agency or another fully independent entity should procure and oversee the third-party monitoring process.
- e. Board's Role in Strategic Direction vs. Operational Influence
  - While the NMLWDB is responsible for providing strategic direction, excessive involvement in operational decision-making could create compliance issues.
  - *Suggested Action:* Clearly document the distinction between strategic oversight and day-to-day operations, ensuring that program implementation remains the sole responsibility of the CSP while the Board maintains an appropriate oversight role.

**Next Steps:**

We request that the NMLWDB submit a revised plan addressing the above conditions no later than **COB Friday May 2<sup>nd</sup>, 2025**. WFS is available to provide guidance and technical assistance in implementing these necessary measures. If further clarification is required, please do not hesitate to reach out.

Ensuring compliance with federal requirements is essential to maintaining the integrity of the workforce system. We appreciate your cooperation in strengthening these firewalls and look forward to working with you to support a fair, transparent, and effective service delivery model.

Sincerely,



Jason Cecil (Apr 2, 2025 11:19 CDT)

Jason Cecil, Workforce Services Assistant Commissioner

April 11, 2025

Mr. Jason Cecil, Assistant Commissioner  
Tennessee Department of Labor & Workforce Development  
220 French Landing Drive  
Nashville, TN 37243

Dear Assistant Commissioner Cecil:

In response to your April 2, letter to the Northern Middle Local Workforce Board (NMLWDB), I submit to you additional justification for Workforce Essentials, Inc. (WEI), fiscal agent and staff to the NMLWDB, to serve as the Career Service Provider for the thirteen counties that comprise the Northern Middle Workforce Area.

**Procurement Request:**

*In accordance with your requesting citing 2 CFR § 200.320(c)(4), the NMLWDB is requesting authorization to use a noncompetitive procurement method from the Tennessee Department of Labor, as our pass-through entity to be the Career Service Provider.*

*According to 20 CFR § 679.410 (b) the local board can request to be the Career Service Provider directly through agreement with the Governor. The Northern Middle Workforce Board is not requesting to be the OSO which requires the selection through a competitive process as stated in 20 CFR § 679.410 (a)(1)(i)(ii).*

Based upon your guidance, the NMLWDB is requesting to use sole source based upon:

- a 23% reduction in funding which equates to over \$2 million loss in the last three years.
- An increase of national, for-profit service WIOA providers responding to procurement request and sharp decline in local provider response. It is less efficient, and less cost-effective to use providers outside the service area. This takes away valuable funding which could be used for participant services but is being paid as performance incentives. In addition, the NMLWDB has also experienced a decline in key performance indicators by utilizing contracted service providers.
- Additionally, sourcing outside the LWDA system, has resulted in a sharp decline in local presence and less flexibility in making the time-sensitive courses of action needed to react to area workforce challenges and meet required KPI's.
- Staff to the NMLWWB have more than 35 years of experience in balancing such challenges successfully.
- The NMTWB can deliver the services in a more efficient and cost-effective staffing plan.



For these reasons, the Board is requesting permission from the Governor or his designee to be the Career Service Provider for Northern Middle Workforce Area and from the Tennessee Department of Labor to allow for non-competitive procurement.

### **Conflict of Interest and Oversight Mechanisms**

To ensure compliance with *20 CFR § 679.410* and *20 CFR § 679.430*, the NMLWDB will enhance its firewall measures by:

#### **a. Oversight of the Career Service Provider (CSP)**

*Issue:* The NMLWDB currently plans to monitor Workforce Essentials, Inc. (WFE), its designated CSP. Given that NMLWDB staff have affiliations with WFE, additional safeguards must be in place to ensure objective oversight.

*Corrective Action:*

- The NMLWDB has agreed to maintain a competitive procurement process of the One-Stop Operator which will report to the full NM Workforce Board. This is already an on-going process as the OSO provides quarterly updates at every NM Workforce Board meeting.
- In addition to the independent OSO, the NMLWD has stipulated that it will procure an independent organization to monitor the Career Service Provider operations. This will ensure an impartial review with stipulated corrective action.
- In addition to internal monitoring, the Career Service Provider will be subject to Tennessee Department of Labor and Workforce Development annual review in accordance with TDLWD's Monitoring Guide by the Performance Accountability Review (PAR) unit, as well as the Workforce Service Division's Program Managers and Oversight Unit. All monitoring reports from the procured monitor and TDLWD will be shared with the NMLWDB.

#### **b. Relationship Between Fiscal Agent and CSP**

*Issue:* WFE is designated as both the Fiscal Agent and the CSP, creating a potential conflict in financial oversight.

*Corrective Action:* In order for Workforce Essentials to serve as both the Fiscal Agent and the CSP, the following oversight mechanisms will be implemented to strengthen financial controls:

- Career Service Provider financial controls and operations will be reviewed and oversight provided by the Workforce Essentials Board of Directors. This is an independent Board of 11 individuals.
- None of the Workforce Essentials Board members serve on the Northern Middle Workforce Board. Thus, ensuring an independent oversight without conflict of interest with the NMLWDB.

- The Northern Middle Local Workforce Board will provide oversight of all WIOA operations in aggregate. The CLEO will continue to sign all WIOA contracts and monthly expenditure reports.
- The NMLWDB will be subject to annual review by the Performance Accountability Review unit, as well as the Workforce Service Division's Program Managers and Oversight Unit. As mandated, the organization will be subject to a single audit by an independent CPA firm.

#### **c. Role of the Independent One-Stop Operator (OSO)**

*Issue:* The OSO currently reports to the NMLWDB Chair or designee, with oversight from NMLWDB staff, which may not provide sufficient independence.

*Corrective Action:* The OSO is currently procured regionally to Mid-Cumberland Human Resources Agency.

- The OSO will report directly to the full Board to ensure neutrality in oversight.
- The OSO will provide a report at each NMLWDB meeting for not only CSP operations, but for the entire workforce system in Northern Middle.

#### **d. Independence of Third-Party Compliance Monitoring**

*Issue:* It is unclear who will procure and oversee the independent third-party monitor. If this responsibility remains with the NMLWDB or WFE, there is a potential conflict of interest.

*Corrective Action:*

- Staff of the Northern Middle LWDB will draft the procurement documents for the independent third-party monitor.
- The Northern Middle LWDB's Executive Committee will review and rate the responses of potential applicants.
- The Executive Committee will make a recommendation to the full Board for approval.
- The winning organization will report directly to the Board Chair and make reports to the full Board at least annually.

#### **e. Board's Role in Strategic Direction vs. Operational Influence**

*Issue:* While the NMLWDB is responsible for providing strategic direction, excessive involvement in operational decision-making could create compliance issues.

*Corrective Action:* The strategic oversight is the responsibility of the Northern Middle LWDB. Responsibility for planning and strategic Direction will fall to that Board. As the Executive Director of the NM Workforce Board, I will focus on Board activities including strategic direction. The day-to-day operations of the Career Service Provider will fall to the corporate



Board of Workforce Essentials and the CSP Program Director. By having two different Board of Directors, without overlap, this firewall prevents overlap between the two organizations and responsibilities.

- The strategic oversight is the responsibility of the Northern Middle LWDB. Responsibility for planning and strategic Direction will fall to the NM LWDB. As the Executive Director of the NM Workforce Board, I will focus on Board activities including strategic direction.
- The day-to-day operations of the Career Service Provider will fall to the corporate Board of Workforce Essentials and the CSP Program Director will report directly to the Workforce Essentials Board.

By having two different Board of Directors, without overlap, this firewall safeguards potential conflicts of interest between the two organizations and responsibilities.

We hope this adequately addresses your concerns as the NMLWDB is confident that this approach will improve services to the citizens of middle Tennessee. If you have additional questions or concerns regarding this request, please feel free to call me.

Sincerely,

  
Marla W. Rye  
Executive Director

Cc: Mayor Bob Rial, CLEO  
John Zobl, Chairman NMLWDB

Attachments: 3/24/25 NMWB Request to be Career Service Provider

March 24, 2025

Governor Bill Lee  
Commissioner Deniece Thomas, Designee  
Tennessee Department of Labor & Workforce Development  
220 French Landing Drive  
Nashville, TN 37243

Dear Commissioner Thomas:

Please accept this letter as an official request for Workforce Essentials, Inc. (WEI), fiscal agent and staff to the Northern Middle Tennessee Workforce Board (NMWB), to serve as the Career Service Provider for the thirteen counties that comprise the Northern Middle Workforce Area.

The NMWB has had seven providers of WIOA services since the State mandated a separation of duties in 2017. Four of those were youth providers while three were adult and dislocated worker service providers, with one being a for-profit company. This frequent rotation of providers, driven by procurement mandates, has caused employee turnover and an erosion of institutional knowledge. As a result, NMWB staff are in a constant state of training and performance has suffered, particularly over the last two years, with key performance indicators such as enrollments and the minimum participant cost rate falling short of required benchmarks.

Although the Board has considered this transition in recent years, the determining factor was the release of allocation planning estimates for 2025-2026. The Northern Middle area is projected to face a reduction of over \$1 million dollars on July 1, 2025. Over the last three years, NMWB's funding has declined almost 25%, prompting the Board to reassess operations, including potential AJC closures and other operational adjustments.

Following the State Workforce Board's adoption of the new procurement policy on February 28, 2025, the NMWB and Chief Local Elected Official determined that the most efficient and effective path forward is for Workforce Essentials to serve as the Career Service Provider.

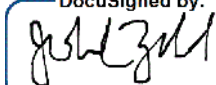
In accordance with the policy, we have attached the following information to address the four stipulated requirements.

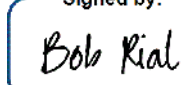
- a. Updated Organizational Chart.
- b. Written procedures indicating firewall separations.
- c. Supporting data for the request.
- d. Timeline to implement.

Thank you for the opportunity to submit this request. We believe it is the optimum solution for the citizens of Tennessee and will provide a quality workforce structure that aligns with economic development and educational entities to promote the vision of TN Works.

If you have additional questions or concerns regarding this request, please address them to our Executive Director, Marla Rye.

Sincerely,

DocuSigned by:  
  
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John ZODI, NIVIVVB Chair

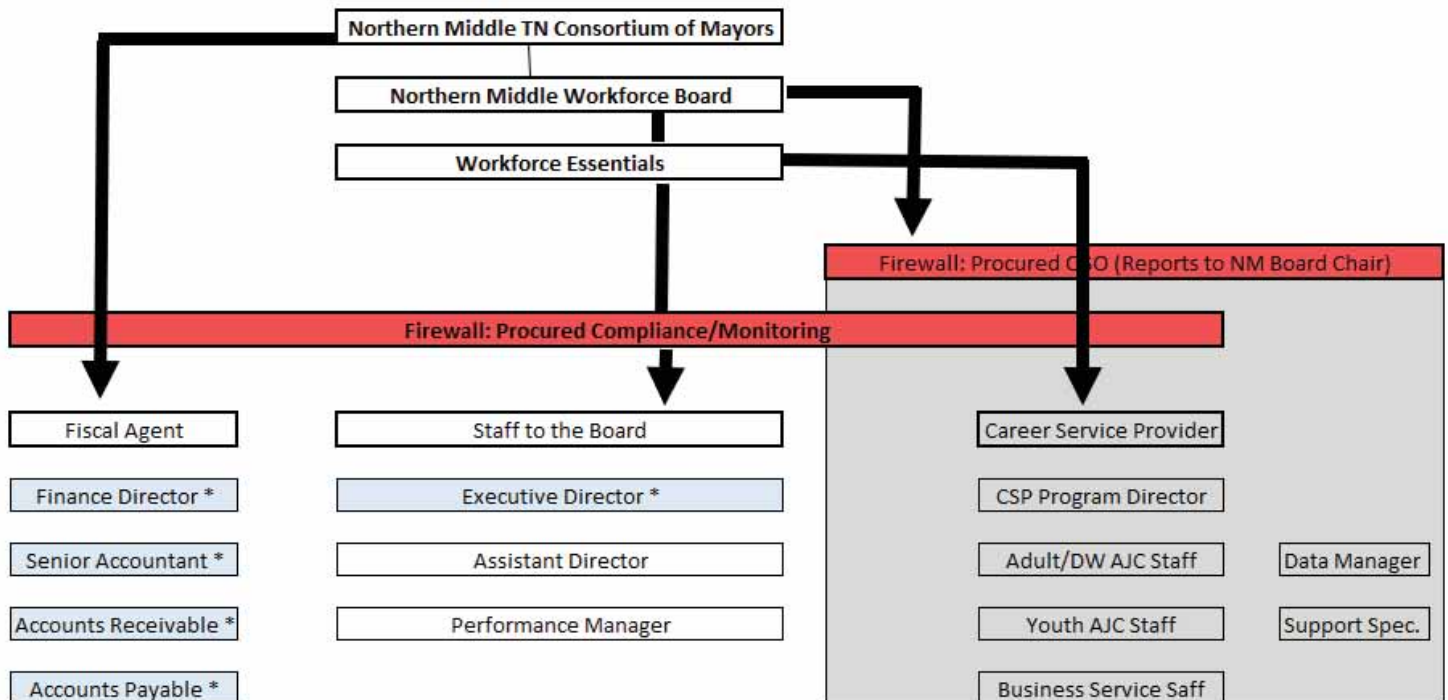
Signed by:  
  
B1D42316DE2F418...  
Bob Rial, Chief Local Elected Official

Cc: Marla W. Rye

## Justification Request

### a. Updated Organizational Chart

The Organizational Chart depicts the three distinct roles of Fiscal Agent, Staff to the Board and Career Service Provider.



\* Allocated percentage via Workforce Essentials Administrative Cost Pool.

DRAFT-Subject to change.

### b. Procedures indicating firewall separations.

Firewalls will be enforced through multiple processes including:

1. The Fiscal Agent will report to the CLEO as he is financially responsible for WIOA funding. The CLEO appoints the fiscal agent and has direct responsibility for services. Monthly invoices require approval in Smart Simple and contracts require his or his designee signature.
2. The NMWB will continue to procure an independent One-Stop-Operator (OSO) which will report to the NMWB Chair or designee. The OSO will present quarterly to the full NMWB. Please know that the NMWB is open to a state-wide procurement of the OSO by your department. The NMWB staff will monitor OSO operations.

3. WEI will provide CSP services and report directly to the Workforce Essentials Board of Directors. The NMWB will provide strategic direction and monitor performance of the career service provider.
4. Programmatic and Fiscal compliance monitoring will be procured to a third party to monitor Board and career service provider operations. By having an independent monitor, all conflicts of interest between the related organization will be eliminated.
5. While not a specific firewall, the NMWB and WE will be subject to a Single Audit by an independent certified public accounting firm which will review grantee's financial management processes, including financial management systems and its compliance with all of its federal grant requirements.

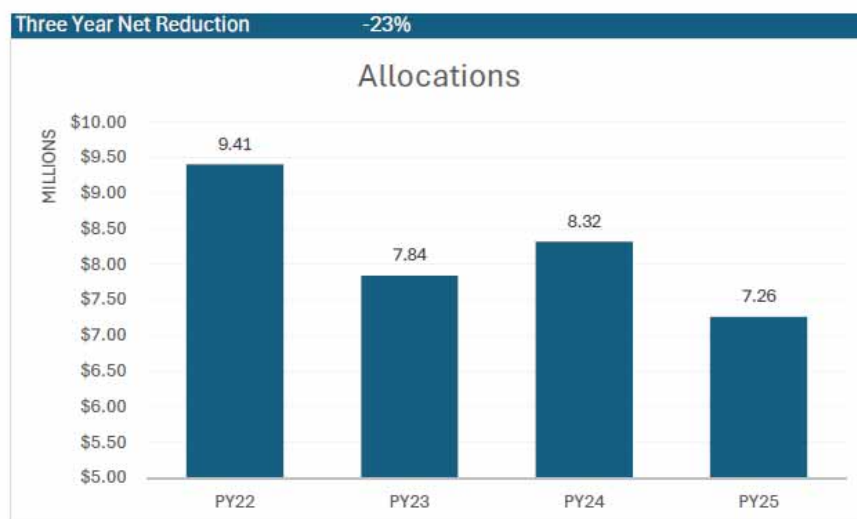
c. Supporting data for the request

**Financial:**

The NMWB has experienced a significant reduction in funding over the last three years. More than \$2 million has been eliminated from the budget since PY23.

**Northern Middle TN LWDB  
Allocation Reduction  
Three-Year Net Reduction**

	Allocations	\$ Reduction	% Reduction
PY22	9,407,167.00		
PY23	7,839,846.55	(1,567,320.45)	-17%
PY24	8,321,810.00	481,963.45	6%
PY25	7,263,356.00	(1,058,454.00)	-13%
Three Year Net Reduction		(2,143,811.00)	-23%





The reduction in funding has caused the NMWB to review operational efficiencies. The current career service provider is a for-profit company. Since contract implementation on January 1, 2021, approximately \$250,000 has been paid in negotiated performance incentives. However, no incentives will be paid for the current program year.

In addition, the Board is currently measuring the effectiveness of bricks and mortar affiliate sites. Decisions will be made at the May board meeting on potential office closures.

### Performance:

At the end of program year 2024, the June report indicated that Northern Middle failed to achieve the MPCR. This is the first year since inception that NM did not meet the standard.

**Northern Middle Report Card - June 2024**

	Adult	Apprenticeship	Dislocated Worker	National Dislocated Worker	Rapid Response	Reemployment Services and Eligibility Assessment	Senior Community Service Employment Program	Statewide Activities	Youth	Total
Total Budget	\$ 3,330,882.84	\$ 228,575.00	\$ 6,351,099.11	\$ 513,321.08	\$ -	\$ 494,191.99	\$ -	\$ 2,998,643.61	\$ 3,564,476.98	\$ 21,498,022.20
Total Obligations	\$ 3,108,895.64	\$ 217,943.41	\$ 6,051,110.40	\$ 513,321.08	\$ -	\$ 483,119.74	\$ -	\$ 2,830,589.00	\$ 3,315,777.48	\$ 20,513,584.95
Total Expenditures	\$ 4,096,132.18	\$ 217,943.41	\$ 4,089,386.41	\$ 513,321.08	\$ -	\$ 422,337.27	\$ -	\$ 2,878,829.79	\$ 3,061,990.02	\$ 16,829,892.18
Total Unobligated Obligations	\$ 913,540.44	\$ -	\$ 2,011,771.99	\$ -	\$ -	\$ 77,962.47	\$ -	\$ 948,729.21	\$ 253,847.46	\$ 4,183,891.79
Total Unobligated Balance	\$ 240,188.80	\$ 3,693.29	\$ 299,988.71	\$ -	\$ -	\$ 11,072.34	\$ -	\$ 1,773,941.61	\$ 248,701.80	\$ 994,432.23
Total Remaining Balance	\$ 1,174,747.24	\$ 3,693.29	\$ 3,311,740.70	\$ -	\$ -	\$ 69,054.71	\$ -	\$ 1,124,769.82	\$ 301,548.94	\$ 7,148,377.04

Obligation %	93.43%	97.48%	93.18%	100.00%	0.00%	97.76%	0.00%	94.07%	93.58%	93.42%
Utilization %	78.42%	97.48%	63.60%	100.00%	0.00%	86.00%	0.00%	82.49%	90.97%	75.96%
Unobligated Obligation %	17.07%	0.50%	11.68%	0.00%	0.00%	11.73%	0.00%	11.77%	4.54%	19.46%
Unobligated Balance %	4.52%	0.52%	4.72%	0.00%	0.00%	2.24%	0.00%	3.93%	4.47%	4.59%
Remaining Balance %	35.10%	1.51%	36.40%	0.00%	0.00%	13.97%	0.00%	37.51%	9.03%	24.04%

Workforce Board Costs	\$ 381,731.24	\$ 10,222.41	\$ 376,714.02	\$ (2,740.00)	\$ -	\$ 18,671.82	\$ -	\$ 204,833.89	\$ 349,412.28	\$ 1,828,874.21
One-Stop Operator Costs	\$ 22,272.04	\$ -	\$ 73,496.73	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 39,368.36	\$ 107,476.83
Career Service Provider Costs	\$ 1,432,734.89	\$ -	\$ 1,810,484.89	\$ -	\$ -	\$ 226,747.28	\$ -	\$ -	\$ 1,470,084.34	\$ 4,843,023.80
Incumbent Worker Training Costs	\$ 16,102.08	\$ -	\$ 12,693.88	\$ -	\$ -	\$ -	\$ -	\$ 178,200.84	\$ 4,384.00	\$ 276,932.79
Adjusted Participant Costs	\$ 617,234.93	\$ 102,713.00	\$ 1,302,804.18	\$ 30,244.80	\$ -	\$ -	\$ -	\$ 1,402,764.05	\$ 1,108,779.85	\$ 4,754,141.21
Total Expenditures	\$ 2,471,404.93	\$ 217,943.41	\$ 3,532,597.68	\$ 17,504.80	\$ -	\$ 245,420.93	\$ -	\$ 1,793,540.82	\$ 2,971,909.88	\$ 11,233,247.60

Workforce Board %	15.43%	6.99%	10.11%	15.63%	0.00%	7.61%	0.00%	11.50%	11.70%	11.79%
One-Stop Operator %	0.90%	0.00%	2.14%	0.00%	0.00%	0.00%	0.00%	0.00%	1.10%	1.12%
Career Service Provider %	58.01%	0.00%	51.31%	0.00%	0.00%	92.39%	0.00%	0.00%	48.47%	44.00%
Incumbent Worker Training %	0.50%	0.00%	2.34%	0.00%	0.00%	0.00%	0.00%	9.54%	0.14%	2.47%
Adjusted Participant %	24.90%	93.01%	34.09%	115.63%	0.00%	0.00%	0.00%	79.75%	37.30%	40.54%

Potential Recapture			
Adult	Dislocated Worker	Youth	Total
First Year Potential Recapture	\$ -	\$ -	\$ -
Second Year Potential Recapture	\$ -	\$ -	\$ -

Performance				
	Adult	Dislocated Worker	Youth	Total
Total Enrollments	1,842	699	1,113	3,654
Cost per Participant	\$ 9,034.06	\$ 4,764.74	\$ 2,436.66	\$ 2,845.39

FAR Monitoring			
Program Year 2022		Program Year 2023	
Review Date	Yes	Review Date	Yes
Findings	No	Findings	No
Findings Resolved	N/A	Findings Resolved	N/A

Federal Measures				
	Out of School Youth <sup>1</sup>	Work Experience <sup>2</sup>	Incumbent Worker Training <sup>3</sup>	Transitional Jobs <sup>4</sup>
2022	52.71%	30.16%	4.57%	0.00%
2023	66.26%	28.11%	0.00%	0.00%

	State Measures			
	Adult	Dislocated Worker	Youth	Total
Direct Participant Cost Rate <sup>1</sup>	38.18%	97.20%	40.10%	33.06%

		System Reconciliation				
		SmartSolve	JOBSVET	difference	Status	
System Reconciliation *	\$	3,115,777.48	\$	3,510,229.09	\$ (394,451.61)	Reconciled





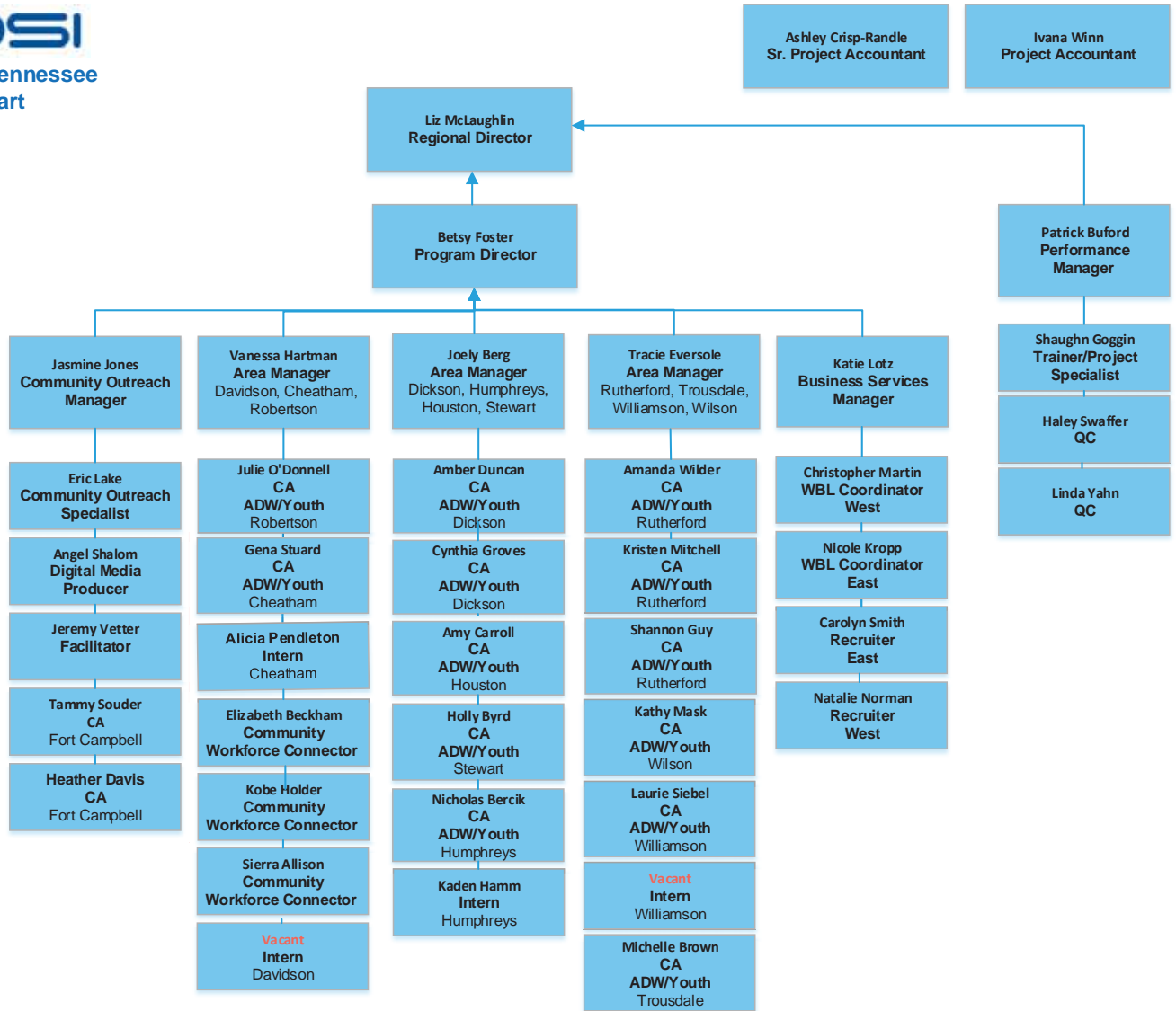
Finally, working with the state, the NMWB implemented pilot programs in three locations to determine the best approach to service delivery. While improvements were made in two of the three areas, the pilot in Clarksville, led by Workforce Essentials proved to be the most successful for Title I operations.

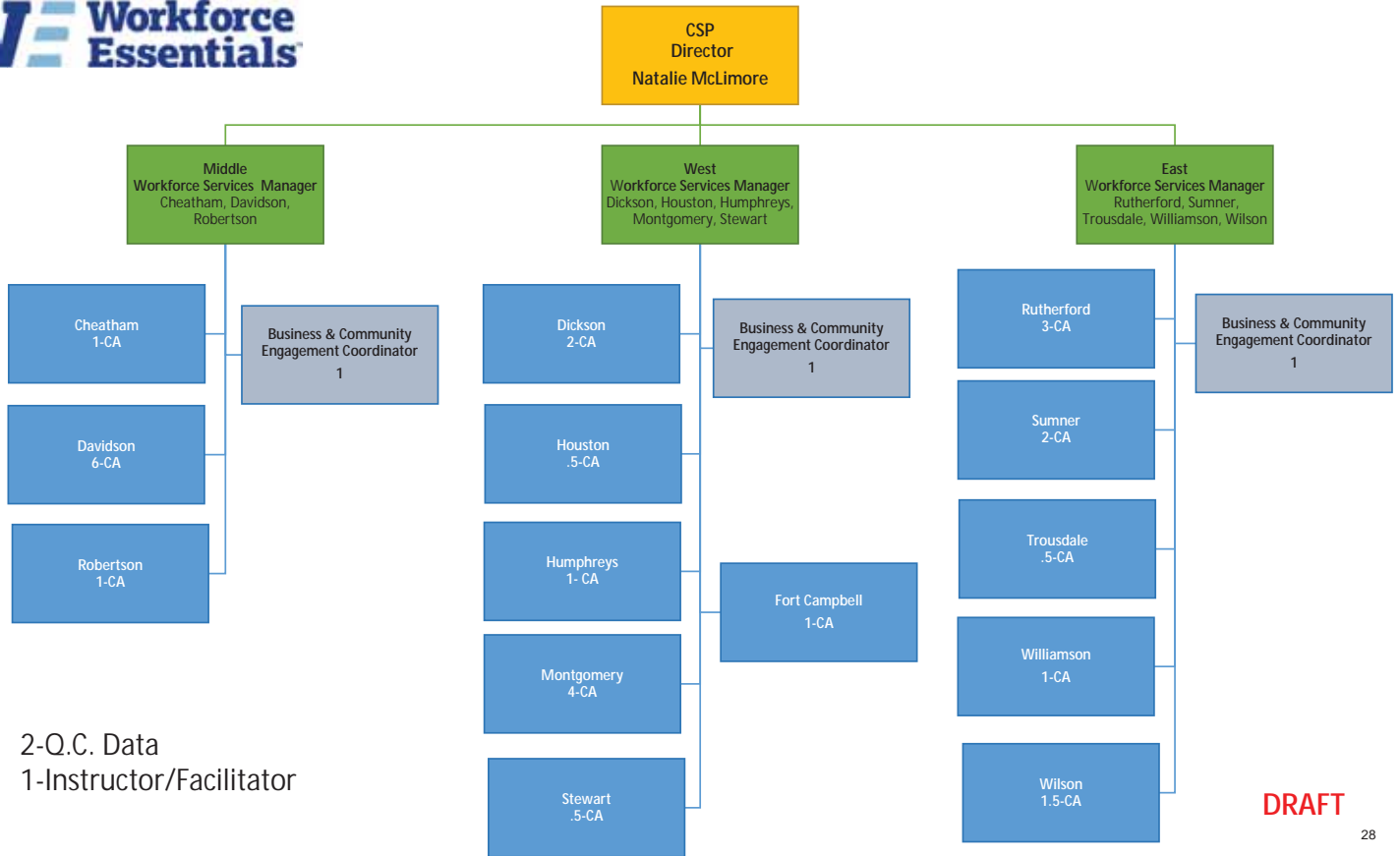
d. Timeline to implement:

Task	Timeline
Submission Request	March 24, 2025
Anticipated Approval	April 1, 2025
Staffing structure finalized	April 18, 2025
Positions posted	April 21, 2025
Selection of staff	May 15, 2025
Staff Training	June 1-30, 2025
Current CSP contracts end*	June 30, 2025
WEI Implementation	July 1, 2025

\*While the timeline is tight, the NMWB reserves the right to extend CSP contracts for specific services such as YEP that otherwise might have an adverse impact on participants.

**EDSI**  
Northern Middle Tennessee  
Organizational Chart

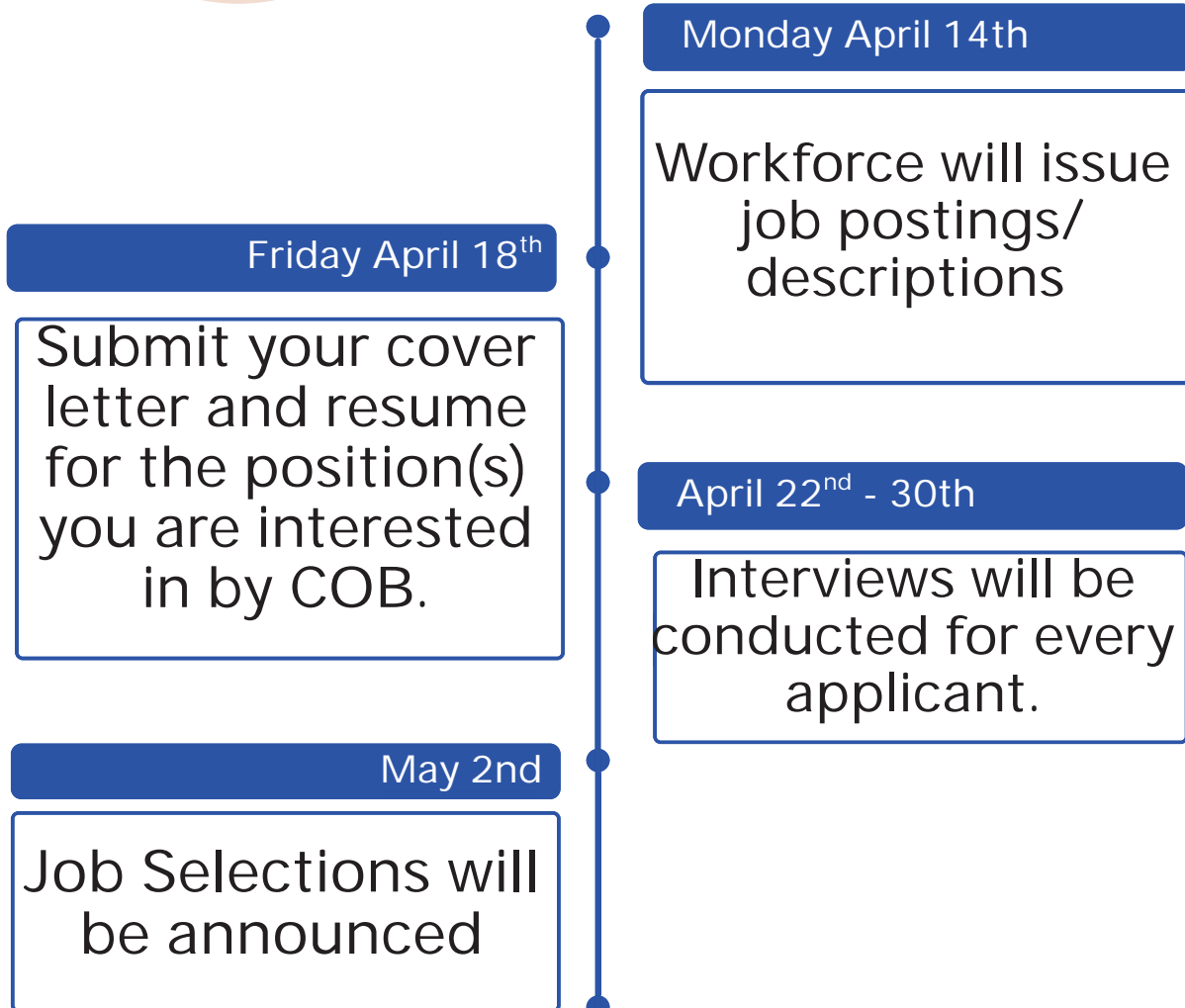




**DRAFT**



# Workforce Essentials Position Selection Timeline



Natalie McLimore  
Workforce Essentials, Inc. | Vice President  
(931) 905.3509  
[nmclimore@workforceessentials.com](mailto:nmclimore@workforceessentials.com)