



Quarterly Board Meeting  
November 8, 2023  
11:30 a.m. to 1:00 p.m.  
Martha O'Bryan Center  
711 South Seventh Street, Nashville

[Click here for Zoom link](#)

Tel: +1 312 626 6799

Meeting ID: 821 3646 0557 Passcode: 324093

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

## AGENDA

**Call Meeting to Order-Declaration of Quorum**

John Zobl

**Approval of Minutes**

John Zobl

**Welcome & Recognition of Board Members**

Marla Rye

**Partner Focus:**

Martha O' Bryan Center  
TN Dept. of Economic & Community Dev.

Kent Miller  
Lyndi Berrones

**Strategic Priorities:**

➡ ***Manage Board funds to support Career Pathways***  
Financial Report Approval

Ginger Fussell

➡ ***Connect People with Career Opportunities:***  
One-Stop-Operator Report/Regional OSO  
Titans Stadium Project

George Phillips  
Marla Rye

➡ ***Improve Efficiency & Effectiveness of Training Programs***  
Eligible Training Provider Policy  
Employment Based Training Grant Policy  
Eligible Training Provider List Reports and Requests

Andrea Dillard

➡ ***Train Workforce to Fill Employer Needs:***  
WIOA Performance Update  
EDSI Operations Report

Meagan Dobbins  
Danielle Ellis

**Public Comment Period:**

Open

**Wrap Up**

John Zobl

**Adjourn**

Zoom Link: <https://us02web.zoom.us/j/82136460557?pwd=ME5Tc2pDeVZoMjJOSE1ueXQ3RDIJQT09>

**Upcoming Meetings-Mark Your Calendars**

February 14, 2024 | May 8, 2024 | August 14, 2024 | November 13, 2024

**Northern Middle Tennessee Workforce Board  
Meeting Minutes  
August 9, 2023, In-Person & via Zoom at 11:30 a.m.**

<b>Members Attending</b>	<b>Members Absent</b>	<b>Staff &amp; Guest Attending</b>
Arrita Summers	Anne Fugate	Marla Rye
Dan Caldwell	Greg Jones	George Phillips
John Zobl	Jessica Largen	Madison Plunkett
Corey Johns	Keith Carnahan	Kailee Bush
Mark Peed	Richie Brandon	Ginger Fussell
Chris West	Seth Thurman	Andrea Dillard
Lynn Seifert		Natalie McLimore
Kristi Spurgeon		Tanya Evrenson
John Alexander		Georgena Wilson
Paul Webb		Liz McLaughlin
George "Bo" Callis		Heather Davis
Shoshana Samuels		Liberty Ushman
Tony Adams		Katina Bass
David Rutledge		Stephanie Coleman
Ginger Jarrett		Kim Rye
Sellittia Johnson		Kimberly Groff
James Harper		Mayor Randall Hutto
		Heather Skelton
		Cathy Royals
		James Starnes
		Danielle Ellis
		Meagan Dobbins
		Lydia Bennett-Carnes
		Renea Rosson
		Patrick Buford
		Lee Harrell
		Greg Manogin

The Northern Middle Tennessee Workforce Development Board met in person at the Volunteer State Community College in Springfield and with a virtual option on Wednesday, August 9, 2023, at 11:30 a.m.

The meeting was called to order by Chairman Zobl. Attendance was taken, and a quorum was declared. Chairman John Zobl asked for a motion to approve the minutes. Chris West made the motion. Dan Caldwell seconded. With no further discussion, the minutes were unanimously approved.

Marla thanked everyone in attendance and recognized those who have put in work since the last meeting. She thanked the AJC recertification team, which included Sellittia Johnson and John Alexander, who visited each AJC in the workforce area. Greg Jones & Dan Caldwell attended the TN Blu-SkillSPAN meeting at Volunteer State Community College. Dr. Arrita Summers continues working with the Automotive Training Program in Clarksville. TDOL and Adult Ed had a summer academy in Chattanooga.

Dr. Lynn Seifert attended and had some special recognition. Dr. Seifert reported that Denise Brison, a Dickson County Adult Education instructor, was recognized as the Tennessee State Teacher of the Year. Marla added that Mayor Hutto plans to work on a Wilson County innovative pilot program with the Summer Youth Employment Program and the county government. Corey Johns will be working with this pilot program as well.

Marla introduced Stephanie Coleman, the Chief Talent Development Officer with the Nashville Chamber of Commerce. She is engaged in the TN Blu-Skillspan organization.

**Partner Focus:**

***TN Blu-SkillSPAN***

Stephanie Coleman informed the Board about the TN Blu-Skillspan organization. It is statewide and supported by the National Skills Coalition. They are committed to inclusive, high-quality skills training and equity. She reviewed how they are organized, which starts with the National Network and transcends to the grassroots/workers. They exist to examine where the skills gaps are in the Middle Tennessee Workforce. It focuses on middle-skills jobs, which are jobs that require more than a high school diploma but less than a four-year degree. As of 2018, in Tennessee, middle-skill opportunities are 56% of jobs. National Skills Coalition has determined that 92% of jobs require some digital skills, so this is also a focus for them.

The coalition is made up of approximately 65 organizations across the state. They are comprised of chambers of commerce, industry partners, community-based organizations, training providers, community colleges, advocacy groups, and labor groups.

TN Blu-SkillSPAN is co-led by the Nashville Area Chamber of Commerce and the Martha O'Bryan Center. There is strong representation in each region, but they are also analyzing their leadership, ensuring they have all the right organizations involved, and ensuring regional representation in urban, suburban, and rural areas.

In 2019, BLU and SkillSPAN were launched in Tennessee as separate coalitions. In 2021, the two coalitions were brought under the same umbrella; in 2023, the co-leadership structure was launched. They are the only coalition of about 35 states that have moved these two under one umbrella. This structure brings together stakeholders that don't always have the same policy positions on workforce issues. This arrangement allows all stakeholders to work together, identify state policy issues, and brainstorm ways to increase the availability and access to good jobs for many people. Legislative areas they have been focusing on and accomplishing were discussed. The areas worked on were to get more individuals ready for what's next in their education and career.

Potential policy changes are being worked on, such as Martha O'Bryan, which is a pilot project that focuses on bridging the benefits cliff so that families have the incentive to further their economic mobility without fearing being in worse shape financially if they have the chance of a promotion. Another one is a past-due balance forgiveness program and more support for part-time students. This group also develops a set of policy priorities to track each year. The five policy priorities tracked for 2023 are expanding career and technical education and work-based learning opportunities, creating greater access to programs by expanding work supports, expanding access to high-quality short-term training, moving to one tuition level for community colleges, and closing the eligibility gap between Tennessee Promise and Tennessee Reconnect.

### ***Summer Youth Employment Program***

Marla informed the Board about the progress of the Summer Youth Employment Program. Currently, 328 young adults are working across the 13 county region, and we have 61% of all youth enrolled in the state of Tennessee. Three of the working youth joined the meeting to talk about their experiences. Liberty works at the Robertson County AJC, Madison works at the Board's administrative office, and Kaylee works with the Montgomery County mayor's office. The girls expressed their desire to work, be productive over the summer, and obtain work references for future jobs. They talked about what they enjoyed about the program, their future goals, and how this experience helped them. When asked how they learned about the program, they said through Facebook and parents. They each had friends in the program and would happily participate again if given the opportunity. Members of the Board mentioned the desire to participate but couldn't because the approval process took too long. They plan to participate next year if they get more advanced notice. Marla expressed her appreciation to EDSI and MAC for their efforts this summer.

### **Strategic Priorities**

#### ***Manage Board funds to Support Career Pathways***

Ginger Fussell reviewed the budget. Quarter 4 expenditures were \$4.3M, approximately \$1M higher than last quarter. Last quarter was approximately \$1M higher than its previous quarter. The successful final two quarters of the year compensated for the lagging first two quarters to bring us to a higher year of spending and grant utilization than our prior year. FYTD expenditures for the year were \$12.5M, approximately \$1.5M over last year. Current quarter expenditures are strong, particularly in the Adult and Youth fund streams. Considering our reduction in funding for the upcoming year, NM staff have begun conversations with EDSI, our largest provider, to pace themselves in obligating their reduced 23-24 pass-through. Ginger explained that last quarter, the Board granted an extension of our authority to request \$500k from last year of DW to Adult re-purposing. We are making that request to the state currently. Considering the amount of Adult needs to be anticipated, NM staff are asking for flexibility to request the re-purposing of \$1M from DW to Adult through June 30, 2023, for a combined total of \$1.5M.

Last quarter, we informed the Board that we would get Summer Youth funding, but we did not know the amount. The funding that impacted the current year budget was approximately \$539k, while the second phase, which began July 1 of 2023, was an additional \$1.7M. In addition to the \$539k increase, we requested and received additional funding on the COVID National Dislocated Worker grant, which ended June 30, 2023. EDSI was able to utilize \$123k of the additional funding. The \$15.2M budget reported at the May meeting grew in Q4 to \$16.2M. We will request approval of this increased budget. Grant utilization in 2022-23 was the highest in three years at 77%.

NM utilized 97% of grant funding expiring June 30, 2023. 100% of WIOA formula funding was used. The most significant portion of the unused funding, related to an additional funding request on the COVID National Dislocated Worker grant of \$400k, was made late in the year.

MPCR increased from 53.27% last quarter to 54.92%, which remains strong compared to the 40% required. This success is driven by the positive outcome of high percentages of expenditures spent directly on participants as intended. However, a less favorable driver is that staff turnover throughout the year out in the field has lowered the overhead costs of our largest provider, EDSI. Contract-to-date (30 months) EDSI met or exceeded all dollar-driven goals except In-School Youth. EDSI exceeded the Adult/DW MPCR at 57%. They met the Youth MPCR at 50%. They exceeded their Work Experience goal at 27% but did not meet their In-School Youth goal at 29%. Contract-to-date (30 months) MAC met or exceeded all dollar-driven goals except In-School Youth. They met the Youth MPCR goal at 50%. They exceeded their Work Experience goal at 38% but did not meet their In-School Youth goal at 38%.



Annual CSP billing increased by \$1.8M compared to last year. Of that amount, \$1.1M relates to the current year pass-through of the COVID National Dislocated Worker grant to EDSI. Quarter 4 CSP billing, which includes COVID NDWG, increased \$777k compared to last quarter and was \$829k higher than Quarter 3 of the previous year, which did not include COVID NDWG. Ginger reviewed the billing progress and pointed out that EDSI spent 94% of their 30-month contract budget. MAC spent 89% of their 30-month contract budget, and MCHRA spent 84% of their 12-month contract budget. Marla explained to the Board that the OSO contract with MCHRA is now a regional contract between Northern Middle and Upper Cumberland. George Phillips will remain as the One-Stop-Operator for both regions.

Ginger updated the Board regarding the three smaller youth contractors. The contractors each received \$100k Youth awards. The three new youth providers contributed \$98k in billing during Quarter 4, \$220k cumulatively. At the end of their 12-month contracts, the providers collectively utilized 73% of \$300k in awards. JTG had the best outcomes fully utilizing their funding and meeting all three dollar-driven goals. Liberty's Station had high concentrations of paid work experience but utilized only 38% of its funding. Monroe Harding utilized 82% of their funding but did not meet MPCR or ISY targets.

The 2023-24 budget, initially presented in May based on year-end carryover projections, has been adjusted to reduce carryover and add Summer Youth funding. The net increase of \$1.5M is the combination of approximately \$800k reduction in carryover offset by the addition of approximately \$2.3M in Summer Youth funding. Ginger explained that last quarter, the Board granted an extension of our authority to request \$500k from last year of DW to Adult re-purposing. We are making that request to the state currently.

The EDSI staffing situation has improved somewhat; however, case management has suffered due to staff turnover. Priority has shifted to the training of staff to improve customer service. The current focus is on reducing caseloads for quality of service. Technical assistance and initial monitoring efforts related to the new Summer Youth Program have been given, which for Phase II follows guidelines outside of the usual WIOA guidelines. The smaller youth contractors programmatically completed grant close-out. Most youth were closed with positive outcomes. Only a few were transferred to EDSI's caseload. A contract has been finalized with MCHRA to conduct regional OSO services for Northern Middle and Upper Cumberland. TDLWD's PAR and Program Integrity Units are currently monitoring Northern Middle. On-site visits were conducted on August 1 and 2; the remaining procedures are in progress.

Ginger reviewed the requested action items. Consideration is requested for the 2022-23 Budget Revision, bringing the total to \$16.2M, adding \$539k from the Summer Youth Phase I and \$400k from the COVID NDWG. Authorization is requested to re-purpose an additional \$1M DW for Adult to 6/30/24. And approval is requested for the 2023-24 Budget Revision, bringing the total to \$14.4M (+\$1.5M net = -\$800K Carryover + \$2.3M Summer Youth). Marla added that there are about 2,000 active participants, and 75% of them are adults, which is why the flexibility to transfer the money is needed. She then explained that an adult worker cannot be a dislocated worker unless they have been laid off. Mark Peed reported that the finance committee approved these action items and motioned for the Board to approve them. Arrita Summers seconded. With no further discussion, the Board approved the action items.

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

George Phillips presented his OSO report. He reported that the Summer Youth Program has gone very well. MPCR is 54.92%. In June, all comprehensive centers other than Sumner showed an increase in traffic. The affiliate centers showed a significant decrease. Dickson County has had an increase in traffic

over the last six months. Unemployment rates in each county have increased. Staff turnover continues to be an issue. Overall, it has been an excellent year with the KPIs. Marla added that Northern Middle has eight of the top ten lowest counties as far as the unemployment rate. Houston County is in the top 10 for unemployment rate at 5.3%.

Natalie McLimore updated the Board about the Tennessee Alliance for Economic Mobility (TAEM) program with Martha O'Bryan. She said that they have put out a commercial on the local cable channels to attract participants to the program. The commercial used a real client's testimony. With the TN Self Sufficiency through the Tank Project, she is starting to receive transitional benefits. Since receiving a \$25M grant, support can finally be offered, and childcare is included. They strive to do co-enrollments so families and caregivers have extra funds available to help and push them into employment, which is a sustainable solution for long-term results. This will push them over the benefits cliff.

Currently, 207 families have been enrolled in the program. The goal is to serve 900 families over a three-year time period. They anticipate a huge enrollment time period next month because of partnering with the school system.

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

Andrea Dillard reviewed the recommendation from the Innovation Committee regarding the Eligible Training Provider List. They recommended approving the two new providers, Excel Barber and Style College and Nightingale College. Nightingale College is a private institute with numerous nursing courses. It is digital learning with clinicals on-site, but their corporate offices are located in Utah. The Innovation Committee recommended their approval be contingent based upon clinical sites being established in the Northern Middle area. They recommended approval of three new programs of existing providers being added and the recertification of three programs that were on the list previously but missed their renewal date. Mark Peed made the motion. Chris West made the second. Dr. Arrita Summers asked if their instructors would come from out of state to teach or if they would find someone local. Andrea stated that the classes are online, but she understood they would send people to teach the clinicals. She felt that this wasn't definite and they could hire someone local as well. The Board voted to approve these requests.

Andrea informed the Committee that all WIOA Federal Reporting Score Card performance measures have either 90% or 100% passing scores. Quarter 4 shows the estimated scores that will be finalized, and those are all passing. A predictive report was run for the first quarter of the new fiscal year and shows passing scores. These scores are from participants who exited the program a year ago. The current issue of having high caseloads with participants who need to be exited and may not be working will affect our scores in the future.

Because of the contractors' high carryover numbers when they took over, they were given the exit goal that 80% of new enrollments needed to be exited. EDSI did not meet the exit goal throughout all four quarters. Exiting participants positively continues to be an issue, as well as staff turnover. MAC performed well in regards to exits.

Andrea shared with the Board the WARN Notice, which details closures/layoff activities of businesses in the Northern Middle Workforce Area. The notice presented happened between January and July of this year. Almost 1,300 workers have been affected. In previous years, advanced notice has been given, but currently, notice might happen on the day of the layoff, which doesn't leave time to meet with employees. These individuals are eligible for the Dislocated Worker program; some are going to the American Job Centers for assistance.

***Improve Efficiency & Effectiveness of Programs***

Marla told the Board that KPI Goals are currently being set by the state now. Final negotiations will happen tomorrow. Northern Middle is at the top or near the top of every list. NM carries the state in numbers compared to its counterparts, but we are second when it comes to funding. Because we perform well, the state continues to request higher performance, but funding has been reduced. These challenges will be addressed during the negotiations tomorrow.

Every three years the AJCs have to be recertified. John Alexander and George Phillips lead the recertification team. John reported that George Phillips (OSO) led the committee. Georgena Wilson (Title III), Allen Senseney (Title II), Sellittia Johnson (Title IV VR), John Watz (Title I & Board Staff ), and John Alexander (Board & State) were members of the committee. They went to each AJC throughout the 13 counties, Ft. Campbell, and the Mobile Coach. They used the state checklist to check for meeting guidelines. They met all the guidelines except for an occasional missing sign, which was corrected. Marla requested a vote to approve the recertification of the centers. John Zobl asked for a motion. Corey Johns made the motion. Dan Caldwell seconded the motion. With no further discussion, the Board approved the recertification.

Marla informed the Board that at the last legislative session, the state passed a new bill that any open meetings have to offer an open comment period. Marla stated that going forward, information would be posted on the meeting public notice that if someone wanted to address the Board, they would have to request to do so before the meeting. At this time, it was requested that if anyone had any comments they would like to make, they could do so now since this was a new process. John Zobl made the comment that he thought Marla and the group were doing a great job.

**Adjourn**

John Zobl reminded the Board that the next meeting would be November 8, 2023. With no other discussion, the meeting was adjourned.

**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**SEPTEMBER 2023 FISCAL UPDATE**  
**2023-24 BUDGET PROGRESSION & SPEND TREND**

	(\$ in 000's)			
Northern Middle LWDA	2023 QTR 1	Expenses YTD	Revised FY 2023-24 12 Mo. Budget	% Spent
Infrastructure Funding Agreement	101	101	1,000	10.1%
Adult	1,275	1,275	3,143	40.6%
Dislocated Worker Re-purposed for Adult	39	39	1,000	3.9%
Dislocated Worker for DW	441	441	4,257	10.4%
Youth	921	921	2,474	37.2%
RESEA	55	55	300	18.3%
National Dislocated Worker (Flood)	18	18	52	34.6%
Summer Youth Phase 1 ended 8/31/23	167	167	435	38.4%
Summer Youth Phase 2 beginning 7/1/23	419	419	1,760	23.8%
<b>Total FY 23-24 Expense vs Budget</b>	<b>3,436</b>	<b>3,436</b>	<b>14,421</b>	<b>23.8%</b>
<p><i>* Northern Middle's grant utilization for Quarter 1 increased by \$910k over Q1 of the prior year.  \$586k of the increase was due to this year's Summer Youth program.  \$324k relates primarily to increase in formula fund spending.</i></p>				
<p><i>* Overall spending is tracking at less than 25% of 2023-24 budget at the end of Q1.  However, Adult and Youth spending are outpacing budget time progression.</i></p>				
<p><i>* In previous meetings, The Northern Middle Board approved flexibility through June 30, 2024 to request of  TDLWD up to \$1.5M for re-purposing of Dislocated Worker (admin and/or program) for Adult.  Of that amount, \$1M has been requested.</i></p>				
<p><i>* EDSI will need to carefully and strategically pace formula spending for the rest of 2023-24.  EDSI has presented a proposal to include a request for additional funding.  Due to funding cuts, only a shift of DW to Adult budget has been granted.</i></p>				

**NORTHERN MIDDLE TN WORKFORCE BOARD  
SEPTEMBER 2023 FISCAL UPDATE**

**Minimum Participant Cost Rate (MPCR)**

TDLWD Minimum Participant Cost Rate (MPCR) - Preliminary Through September 2023

**MPCR = 49.82%**

	MAC Youth	EDSI Youth	EDSI Adult, Dislocated Worker	NM's National DW Grant- Flood	Other (NM, & IFA)	Total
Qualifying Expenses	\$ 88,743	\$ 457,258	\$ 756,411	\$ 20,245	\$ -	\$ 1,322,657
Total Program	\$ 173,360	\$ 762,203	\$ 1,445,048	\$ 20,245	\$ 254,110	\$ 2,654,966
MPCR	51.19%	59.99%	52.35%	100.00%	0.00%	49.82%

**Northern Middle met 40% Requirement in preliminary calculations.**

**The transition of 4 locations to the Labor Participation Rate Pilot project lowers MPCR.**

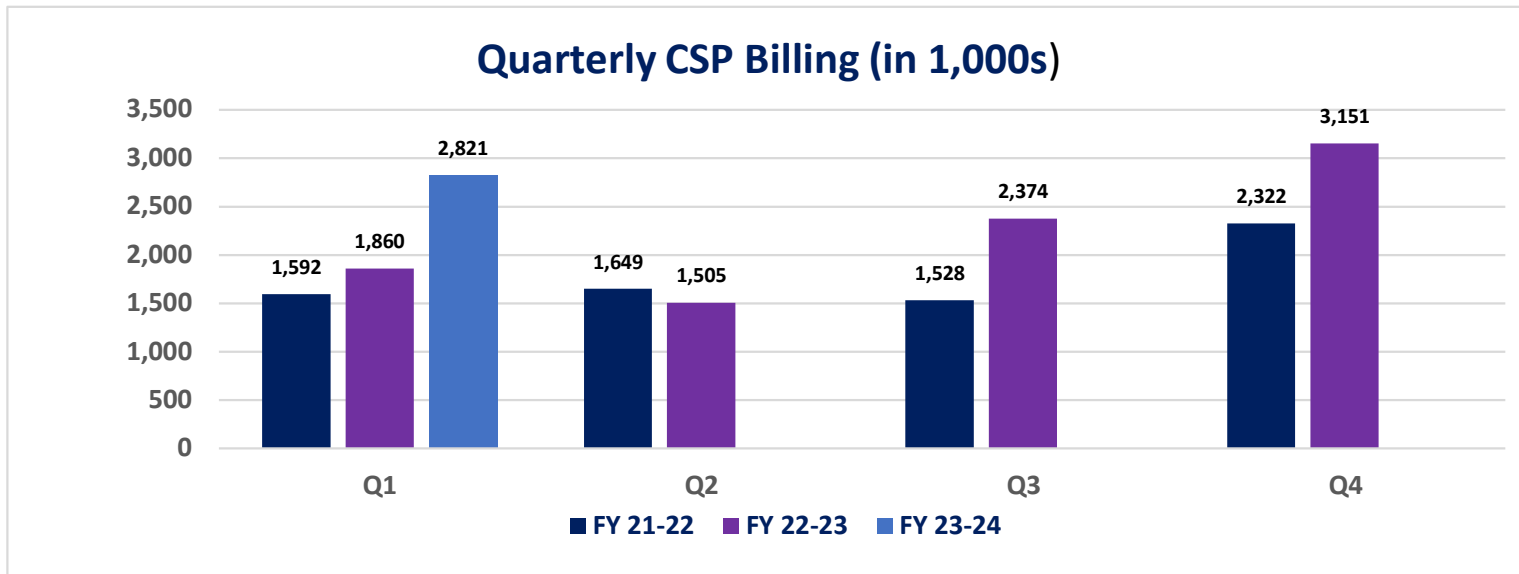
**National Dislocated Worker (Humphreys Flood) grant included through 8/31/23.**

**\*\*\* PRIOR QUARTER MPCR = 54.92%\*\*\***

# NORTHERN MIDDLE TN WORKFORCE BOARD

## SEPTEMBER 2023 FISCAL UPDATE

### CAREER SERVICE PROVIDER - BILLING TREND



*Q1 CSP billing decreased \$330k compared to last quarter,  
but increased \$961k from the prior year Q1.*

Career Service Provider Billing	Q1	Q2	Q3	Q4	Total
CSP Billing FYE 6/30/22 EDSI & MAC	1,592	1,649	1,528	2,322	7,091
CSP Billing FYE 6/30/23 EDSI & MAC	1,860	1,505	2,374	3,151	8,890
CSP Billing FYE 6/30/24 EDSI & MAC	2,821				2,821

**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**SEPTEMBER 2023 FISCAL UPDATE**  
**CONTRACTOR - BILLING PROGRESS**

	In \$000's				
Career Service Provider Billing	Cumulative through Jun 2023	Total Spent Qtr Ended Sep 2023	Budget Spent Contract To Date	Total 42 Month Contract Budget	% Spent - * 79% time elapsed (contracts extended)
EDSI (33 Month Comparison)	\$ 16,820	\$ 2,148	\$ 18,968	\$ 24,138	79% *
EDSI (Summer Youth bgt through 6/30/24)	\$ 76	\$ 498	\$ 574	\$ 1,759	33%
MAC (33 Month Comparison)	\$ 1,181	\$ 133	\$ 1,314	\$ 1,840	71% *
MAC (Summer Youth bgt through 6/30/24)	\$ 15	\$ 42	\$ 57	\$ 96	59%
Contract-to-Date through Q1 2023-24	\$ 18,092	\$ 2,821	\$ 20,913		

	In \$000's				
One-Stop Operator Billing	Cumulative through Jun 2023	Total Spent Qtr Ended Sep 2023	Budget Spent Contract To Date	Total 12 Month Budget	% Spent - 25% time elapsed (new contract awarded)
MCHRA - (12 Month Comparison)	\$ -	\$ 51	\$ 51	\$ 300	17%

# **NORTHERN MIDDLE TN WORKFORCE BOARD**

## **SEPTEMBER 2023 FISCAL UPDATE**

### **MONITORING UPDATE**

#### **EDSI and MAC - Career Service Providers**

- \* **Staffing/Training update - While EDSI's staffing situation has improved somewhat, case management has suffered due to the staff turnover. Priority has shifted to training of staff to improve customer service. Focus on reducing caseloads for quality of service, over quantity. (Training held 10/5/23)**
- \* **Monthly desk review of invoices is performed analyzing contract progress and performance.**
- \* **Biweekly contractor meetings continue.**
- \* **Northern Middle program and fiscal staff provided technical assistance to EDSI and MAC as needed; provided EDSI guidance on management of tracking obligations and pacing remaining contract expenditures.**
- \* **Northern Middle program staff conducted random sampling of EDSI and MAC participant files; responses and corrections were made by both contractors.**
- \* **Summer Youth monitoring and technical assistance is ongoing.**

#### **Mid-Cumberland HRA - One-Stop Operator**

- \* **The One-Stop Operator continues to promote enhanced oversight of partner accountability in supporting KPI goals.**
- \* **The One-Stop Operator has been asked to assume more responsibility in coordinating partner rent agreements.**

#### **Monitoring of Northern Middle**

- \* **TDLWD's annual PAR monitoring is ongoing with a few remaining items. Report is pending.**
- \* **TDLWD's Program Integrity Unit continues to send monitoring reports. No findings to date.**
- \* **Financial audit is upcoming.**



**NORTHERN MIDDLE TN WORKFORCE BOARD  
SEPTEMBER 2023 FISCAL UPDATE**

**ACTION**

- \* **2023-24 Financial Report**
- \* **Increase EDSI RESEA pass-through by \$174,994 effective 10/1/23 to 6/30/24**

# Northern Middle Tennessee Workforce Development Board AJC Report

For July 1 to September 30 2023

Report Date: November 8, 2023

## Local Area Updates

The first quarter of the Program Year and the second half of the summer was spent in preparations for the new Labor Force Participation Rate (LFPR) Pilot Program, which is to be put in place for the four Northern Middle counties that are lagging behind the state's average rate. Those counties are Humphreys, Montgomery, Houston and Stewart.

The pilot program in those four counties will require a complete mind-shift for the AJC staff in those four counties. Rather than the traditional focus of Title I to put participants through a sometimes lengthy and expensive training process; the focus will shift to a Work First approach, to place people in jobs as quickly as possible.

There will be a lot of process and procedural changes in those four AJCs. This is being referred to as a pilot program, as it could lead to an entirely new way of doing business in all of our AJCs, and possibly across the state.

**49.82%**

**Contractual  
MPCR**

(Including OSO Costs,  
7.123 to 9.30.23)

## Partner Program Updates

### Title I Total Enrollments



### Adult Education

For the quarter ending September 30;  
2,950 received student services.

97 students received their HiSETs

160 students received a level gain

### Wagner Peyser

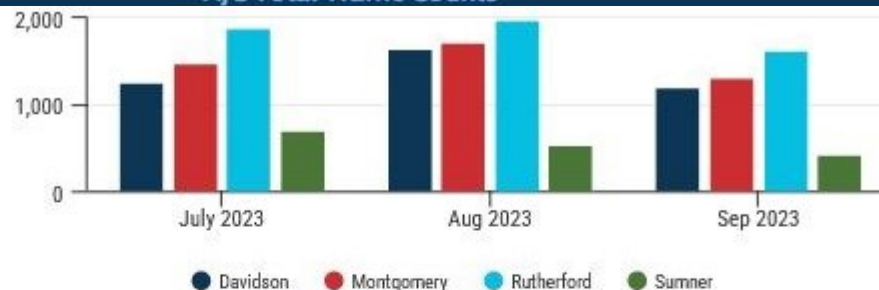
4,194 (-15.6%)	New employers registered
14,878 (-13.1%)	New Job Orders in Jobs4TN
2,212 (+13.78%)	Wagner Peyser Participants

### Vocational Rehabilitation

2,032	Active Cases
344	Applications
66	Currently Working
86	Successful Closures

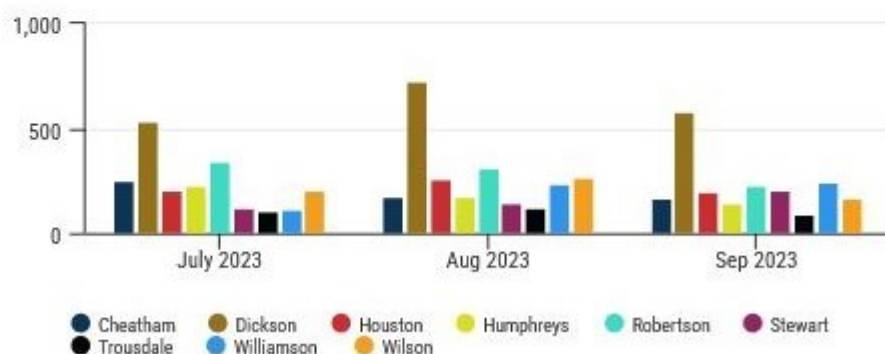
## AJC Total Traffic Counts

### Comprehensives



Total Individual Visitors  
**22,383** (21,524)

### Affiliates



# Northern Middle AJC Report

## September 30, 2023

By County as of Sep 30, 2023; NM = 2.9% TN = 3.4%

Challenges Going Forward

County	Unemployment Rate (June 30)	Unemployment Rate (Sep 30)	Quarterly Change
Cheatham	2.9%	2.7%	-0.2
Davidson	3.0%	2.8%	-0.2
Dickson	3.1%	2.9%	-0.1
Houston	5.3%	4.5%	-0.8
Humphreys	3.7%	3.5%	-0.2
Montgomery	4.2%	4.0%	-0.2
Robertson	3.1%	2.9%	-0.3
Rutherford	3.0%	2.8%	-0.2
Stewart	4.2%	3.8%	-0.4
Sumner	3.0%	2.8%	-0.2
Trousdale	3.5%	3.3%	-0.2
Williamson	2.8%	2.7%	-0.1
Wilson	3.1%	2.9%	-0.2

As usual, staff turnover still plagues Northern Middle and it will for the foreseeable future. Those that suffer most from staff turnover are our participants.

Due to the LFPR Pilot Program and other factors, there is a new emphasis on the Work First model. In order for success, there needs to be buy-in by all AJC partners on this approach. There will also be a need for strategic planning to guard against duplication of services across AJC partners.

If some partners are resistant to adopting this model for whatever reason, it will be much harder to attain our goals and reach our KPI targets

### KPIs

Enrollments	July	August	September	Q1	Target
Title I - Adult & DW	81	114	96	230	210
Title I - Youth	44	72	62	178	97
In-School Youth	2	8	31	41	34
Jobs for veterans	12	15	12	39	36
Justice Involved	69	93	88	250	267
RESEA Co-Enrollments	3	3	4	10	12
SNAP E&T	73	90	60	223	294
TAA Co-Enrollment	0	0	0	100%	100%
Wagner-Peyser	676	821	721	2,218	1,425

Our Northern Middle KPIs for the first quarter in the Program Year were very good, for the most part. The quarterly figure in **green** shows that we have met or exceeded our target, figures in black shows we are close, while figures in **orange** means that we need to improve. SNAP E&T enrollments are **76%** of where we need to be, while RESEA Co-Enrollments Title I are **83%** of target.

While we failed to meet our RESEA target in the first quarter, we have picked up in October. The same thing happened last year at this time.





## **Eligible Training Providers Policy (DRAFT)**

### **Purpose**

To provide information and direction required under the Workforce Innovation and Opportunity Act (WIOA) for training providers on Tennessee's statewide Eligible Training Provider List (ETPL).

### **Background**

The ETPL supplies useful information on training providers, the services they provide, and the quality of their programs. To maximize customer choice and assure that all population groups are served, a comprehensive process must ensure that a significant number of qualified Eligible Training Providers (ETPs) are available to customers. Only approved programs listed on the State's ETPL are authorized for referral and enrollment of a WIOA participant. Eligible applicants can use the ETPL to make an informed choice regarding training providers. In this way, the ETPL provides consumers with an option, which also supports increased performance accountability.

### **Policy & Instructions**

#### **I. Types of Entities Eligible To Apply to be Eligible Training Providers**

Potential Eligible Training Providers must be authorized to offer training services in Tennessee. Entities eligible to apply to become Eligible Training Providers (ETPs) are:

- A postsecondary educational institution that provides a program that leads to an associate degree, baccalaureate degree, diploma or certificate;
- Apprenticeship programs, including Registered Apprenticeship Programs (RAPs) registered under the National Apprenticeship Act.
- Other public or private providers that provide training services, which may include Community Based Organizations (CBOs) and joint labor-management organizations
- Eligible providers of adult education and literacy activities under WIOA Title II if such activities are provided in combination with training services described in 20 CFR 680.350
- Other groups as determined by the Governor.

In-state and out-of-state post-secondary institutions must be authorized by a state governing body – such as the Tennessee Higher Education Commission (THEC) or the Tennessee Board of Regents (TBR), – to operate in the State of Tennessee. This does not apply to Registered Apprenticeships.

#### **II. Eligible Training Providers and Programs of Study**

Programs may be delivered in person, online, or via a blended approach and must lead to at least one ETPL qualifying credential defined as:

- An industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the State of Tennessee or federal government;
- A postsecondary credential, including an associate or baccalaureate degree;
- A secondary school diploma or its equivalent;

- Employment; or
- Measurable skills gains toward a recognized postsecondary or secondary school diploma or its equivalent credential.

### **III. Initial Eligibility**

Potential ETPs may seek initial eligibility for one (1) or more programs of study. Programs approved for initial eligibility will remain on the ETPL for twelve (12) months from the date the program was approved. RAPs are exempt from initial eligibility procedures. (RAPs that elect to participate must be included on the ETPL, subject to the procedures in Section 5.)

#### **A. Requirement for Consideration of Initial Eligibility:**

1. Applications, accessed through Tennessee's Department of Labor and Workforce Development's (TDLWD) case management system, must describe each program of training services offered and include accurate and timely performance data and cost information for each program under consideration.
2. Performance information must include one of the following: Unsubsidized employment 2<sup>nd</sup> quarter or 4<sup>th</sup> quarter after exit, median earnings, credential attainment.
3. Information concerning whether the provider is in partnership with a business.
4. Evidence that program successfully leads to an ETPL qualifying credential.
5. Information addressing the alignment of training with in-demand industry sectors and occupations, to the extent possible.

#### **B. Northern Middle Workforce Board (NMWB) – Responsibilities During Initial Eligibility:**

1. Notify providers of the opportunity to apply for the ETPL.
2. Verify the potential ETPs are compliant with State laws by possessing a current license, certification, registration, approval or exemption from the appropriate State or federal licensing agency.
3. Confirm initial eligibility applications are complete and accurate.
4. Evaluate the experience and reputation of the potential ETP/programs of study.
5. Make a NMWB staff determination of completeness regarding ETPs application within thirty (30) business days of receipt, and once complete, place on the agenda for the next regularly scheduled NMWB meeting. Notify provider and State ETPL office of NMWB decision to approve, postpone, or deny within ten (10) business days of decision.

### **IV. Continued Eligibility**

During the final three months of a program's initial eligibility, the NMWB must perform a subsequent review to determine whether the program will be granted Continued Eligibility. If granted, ETPs will remain on the list until the next continued eligibility determination. Programs approved for continued eligibility will remain on the ETPL for twenty-four (24) months from the date the program was approved after subsequent review.

#### **A. Information Requirements for Consideration of Continued Eligibility:**

1. During the final three months of an ETPs initial eligibility the ETP must review their applications to ensure the information included therein is accurate.
2. ETPs must submit accurate performance data and program cost information as directed by NMWB.

#### **B. NMWB Responsibilities During Continued Eligibility**

1. Assess program specific information provided by the ETP to determine whether to continue eligibility or remove program from ETPL.
  - a. Whether the providers timely and accurately submitted all the information required for completion of eligible training provider performance reports required under WIOA 116(d)(4) and all the information required for initial and continued eligibility.
  - b. ETP performance on WIOA performance indicators: Unsubsidized Employment 2<sup>nd</sup> Quarter

- or 4<sup>th</sup> Quarter after exit, median earnings, credential attainment
- c. Access to training services throughout the state, including rural areas and through technology use
- d. Information reported to state agencies on federal and state training programs other than programs within WIOA Title I-B
- e. The degree to which training programs relate to in-demand industry sectors and occupations in the state.
- f. State licensure requirements of training providers, and licensing status of providers of training services, if applicable
- g. ETP's ability to offer quality training services leading to an ETPL Qualifying Credential
- h. ETP's ability to provide trainings that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities.
- i. ETP's ability to provide training services to individuals who are employed and individual with barriers to employment
- j. State performance standard measures for programs with a minimum of ten (10) WIOA students at the end of each program year (July 1 – June 30):
  1. WIOA student completion rate for each program must be greater than or equal to 40%
  2. All student completion rates for each program must be greater than or equal to 70%
  3. WIOA student placement rate for each program must be greater than or equal to 40%
  4. All student placement rates for each program must be greater than or equal to 70%

**As allowed by law, the Northern Middle Workforce Board (NMWB) will require the following Performance measure to evaluate the subsequent eligibility determination for programs Serving WIOA students:**

- **WIOA student completion rate (completion defined as resulting in a credential) for each program must be greater than or equal to 60%**
  - **WIOA student placement rate for each program must be greater than or equal to 60%**
  - **Note: At the end of the first year if program meets both measures it will be approved for 2 years. If program meets one measure it will be approved for one year. The following year it must meet both measures or it will be removed from the ETPL.**
2. Notify provider and State ETPL office of NMWB decision to approve, postpone, or deny within ten (10) business days of decision.

## **V. Registered Apprenticeship Programs (RAPs)**

RAPs registered under the National Apprenticeship Act are not subject to the same application and performance information requirements or NMWB approval process as other training providers. To be included on the ETPL RAPs must express interest by op;tin-in.

- A. RAPs must provide the following basic information>
  1. Occupations included within the RAP
  2. Name and address of the RAP sponsor
  3. Name and address(es) of the related technical instruction provider(s) and the location(s) of instruction if different from the program sponsor's address
  4. Cost of the instruction, if the provider of the Related Technical Instruction is different from the program sponsor
  5. Method and length of instruction
  6. Number of active apprentices
- B. RAPs are exempt from performance reporting requirement in WIOA 116(d)(4) and 122 but may voluntarily report performance outcomes
- C. RAPs are maintained on the ETPL until:

1. They are deregistered
  2. The RAP notifies the State that it no longer wants to be included
  3. The RAP is determined to have intentionally supplied inaccurate information or to have substantially violated any provision of Title I WIOA or the WIOA regulations, including 29 CFR Part 38
- D. NMWB Responsibilities for RAPs
1. NMWB will act on RAP's application within thirty (30) business days of receipt
  2. NMWB will contact State ETPL office to verify the registration status of all RAPs that express interest in being included on the ETPL and re-verify no less than every two (2) years

## **VI. Denial/Revocation of a Provider from the ETPL**

A training provider must meet performance and provide accurate information to the NMWB and the TDLWD. Eligibility may be denied/revoked for the following reasons:

### **A. Denial based on Eligibility Requirements**

1. Provider does not have the appropriate State and/or Federal approval to operate
2. The application is incomplete
3. The program under consideration does not meet the definition of WIOA training services
4. Program does not meet the established eligibility criteria or the established minimum performance levels
5. Provider intentionally supplied inaccurate performance information

### **B. Denial based on Training Provider Responsibilities**

1. Providers that do not submit annual performance data by the designated due date (exceptional circumstances beyond the provider's control, such as natural disasters, will be taken into account)
2. Providers that intentionally supply inaccurate performance information
3. Providers that violate any provision of WIOA or its regulations, including 29 CFR part 38
4. Providers that fail to demonstrate the business capacity or integrity to successfully deliver training

### **C. NMWB Denial/Revocation Responsibilities**

1. Though the recommendation to deny or revoke a provider/program may originate from either the NMWB or the TDLWD, the MNWB will be responsible for denying/revoking ETP's eligibility
2. Revocation is for a period not less than two years for providers that intentionally supply inaccurate information or substantially violate any provision of WIOA or its regulations, including 29 CFR part 38. The training provider is liable to repay all WIOA Title I funds received during the period of noncompliance
3. Providers that wish to appeal a denial or revocation of eligibility may appeal to the NMWB. After a decision has been rendered by the NMWB a provider may appeal to the State ETPL office.

## **VII. Appeals**

If a program is denied eligibility, the training provider may take the following steps:

- A. Training providers have the right to appeal denial of eligibility status and may begin that process with the NMWB.

- B. If the NMWB does not reverse their original denial, the training provider may appeal to the State ETPL office.

### **VIII. Reciprocal Agreements**

NMWB can send a participant to training located in a different state if the training provider is on the ETPL in that state and the state has a reciprocal agreement with Tennessee.

- A. The State ETPL office will be responsible for entering into reciprocal agreements.
- B. All reciprocal agreements signed prior to June 30, 2023 will no longer be valid after that date.

### **References**

20 CFR 680.410; 20 CFR 680.350; WIOA Section 134(c)(3)(D)(x); 20 CFR 680.450(b); 20 CFR 680.450(e)(1); 20 CFR 680.450(e)(2); 20 CFR 680.450(e)(3); 20 CFR 450(e)(5); 20 CFR 680.460(f)(10); 20 CFR 680.470(b)(1-3); 20 CFR 460(1); 20 CFR 680.480; TEGL 8-19; WIOA Section 116(d)(4); WIOA Section 122(b)(4)(B).

Authorized by:

Approved by:

\_\_\_\_\_  
Marla Rye, Executive Director      Date

\_\_\_\_\_  
John Zobl, Chairman      Date





**State of Tennessee  
State Workforce Development Board**

220 French Landing Drive, 4A  
Nashville, TN 37243-1002  
(615) 741-0409

# State Workforce Services Policy Eligible Training Provider

**Effective Date: August 25, 2023**

**Duration: Automatic Annual Renewal**

## **Purpose:**

This policy provides information and direction required under the Workforce Innovation and Opportunity Act of 2014 (WIOA) for training providers on Tennessee's statewide Eligible Training Provider List (ETPL).

## **Scope:**

- American Job Center Partners
- Fiscal Agents
- Local Workforce Development Boards
- One-Stop Operators
- State Workforce Development Board
- Potential and Approved Eligible Training Providers

## **Background:**

Only approved programs listed on the State's ETPL are authorized for referral and enrollment of participants who receiving WIOA funding. Eligible applicants can use the ETPL to make an informed choice regarding training providers.

## **Contents**

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## 1. Training Providers

Potential Eligible Training Providers must be authorized to offer training services in Tennessee.

Entities eligible to apply to become Eligible Training Providers (ETPs)<sup>1</sup> are:

- A. Institutions of higher education providing a program of study that leads to a recognized postsecondary credential;
- B. Apprenticeship programs, including Registered Apprenticeship Programs (RAPs) registered under the National Apprenticeship Act;
- C. Other public or private providers that provide training services, which may include Community-Based Organizations (CBOs) and joint labor-management organizations;
- D. Eligible providers of adult education and literacy activities under WIOA Title II if such activities are provided in combination with training services described in 20 CFR § 680.350<sup>2</sup>; or,
- E. Other groups as determined by the Governor.

## 2. Programs of Training Services/Programs of Study

Programs may be delivered in person, online, or via a blended approach and must lead to at least one ETPL Qualifying Credential, defined as<sup>3</sup>:

- A. An industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the State of Tennessee or federal government;
- B. A postsecondary credential, including an associate or baccalaureate degree;
- C. A secondary school diploma or its equivalent;
- D. Employment; or
- E. Measurable skills gains toward a recognized postsecondary or secondary school diploma or its equivalent credential.

<sup>1</sup> Employment and Training Administration, US Department of Labor, *Training and Employment Guidance Letter No. 8-19*, Attachment I, I-3; Jan. 2, 2020. (Subsequently referenced as TEGL 8-19); 20 CFR § 680.410

<sup>2</sup> 20 CFR § 680.350 ; WIOA § 134 (c)(3)(D)(x). g

<sup>3</sup> TEGL 8-19, p. I-3.

### 3. Initial Eligibility

Potential ETPs may seek initial eligibility for one (1) or more programs of study. Programs approved for initial eligibility will remain on the ETPL for twelve (12) months from the date the program was approved.<sup>4</sup> RAPs are exempt from initial eligibility procedures. (RAPs that elect to participate must be included on the ETPL, subject to the procedure in Section 5.)<sup>5</sup>

#### A. Requirements for Consideration of Initial Eligibility:

1. Applications, accessed through Tennessee's Department of Labor and Workforce Development's (TDLWD) case management system, must describe each program of training services offered and include accurate and timely performance data and cost information for each program under consideration.<sup>6</sup>
2. Performance information must include one of the following: Unsubsidized Employment 2<sup>nd</sup> Quarter or 4<sup>th</sup> Quarter after exit, median earnings, credential attainment<sup>7</sup>
3. Information concerning whether the provider is in partnership with a business.<sup>8</sup>
4. Evidence that program successfully leads to an ETPL Qualifying Credential.
5. Information addressing the alignment of training with in-demand industry sectors and occupations, to the extent possible.<sup>9</sup>

#### B. Local Workforce Development Board (LWDB) – Responsibilities During Initial Eligibility:

1. Notify providers of the opportunity to apply for the ETPL.
2. Verify that potential ETPs are compliant with State laws by possessing a current license, certification, registration, approval or exemption from the appropriate State or federal licensing agency.
3. Confirm initial eligibility applications are complete and accurate.
4. Evaluate the experience and reputation of the potential ETP/programs of study.
5. Make a LWDB staff determination of completeness regarding ETP's application within thirty (30) business days of receipt, and once complete, place on the agenda for the next regularly scheduled LWDB meeting. Notify provider and State ETPL office of LWDB decision to approve, postpone, or deny within ten (10) business days of decision.

### 4. Continued Eligibility

During the final three months of a program's initial eligibility, the LWDB must perform a subsequent review to determine whether the program will be granted Continued Eligibility. If granted, ETPs will remain on the list until the next continued eligibility determination. Programs approved for continued eligibility will remain on the ETPL for twenty-four (24) months from the date the program was approved after subsequent review.

#### A. Information Requirements for Consideration of Continued Eligibility:

1. During the final three months of an ETP's initial eligibility the ETP must review their applications to ensure the information included therein is accurate.

<sup>4</sup> TEGL 08-19, Attachment II, p. II-2; WIOA § 122 (b)(4)(B).

<sup>5</sup> TEGL 08-19, Change 1, p. 2 & 20 CFR § 680.450 (b)

<sup>6</sup> TEGL 08-19, Attachment III, p. III-1 & 20 CFR § 680.450 (e)(1).

<sup>7</sup> TEGL 08-19, Attachment III, p. III-1 & 20 CFR § 680.450 (e)(2).

<sup>8</sup> TEGL 08-19, Attachment III, p. III-1 & 20 CFR § 680.450 (e)(3).

<sup>9</sup> TEGL 08-19, Attachment III, p. III-1; 20 CFR § 680.450 (e)(5).

2. ETP's must submit accurate performance data and program cost information as directed by the LWDB.
- B. LWDB Responsibilities During Continued Eligibility
  1. Assess program-specific information provided by the ETP to determine whether to grant continued eligibility or remove program from the ETPL:
    - a. Whether the providers timely and accurately submitted all of the information required for completion of eligible training provider performance reports required under WIOA § 116(d)(4) and all of the information required for initial and continued eligibility<sup>10</sup>
    - b. ETP performance on WIOA performance indicators: Unsubsidized Employment 2<sup>nd</sup> Quarter or 4<sup>th</sup> Quarter after exit, median earnings, credential attainment
    - c. Access to training services throughout the state, including rural areas and through technology use
    - d. Information reported to state agencies on federal and state training programs other than programs within WIOA Title I-B
    - e. The degree to which training programs relate to in-demand industry sectors and occupations in the state
    - f. State licensure requirements of training providers, and licensing status of providers of training services, if applicable
    - g. ETP's ability to offer quality training services leading to an ETPL Qualifying Credential.
    - h. ETP's ability to provide trainings that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities
    - i. ETP's ability to provide training services to individuals who are employed and individuals with barriers to employment
    - j. State performance standard measures for programs with a minimum of ten (10) WIOA students at the end of each program year (July 1 – June 30):
      1. WIOA student completion rate for each program must be ≥ to 40%
      2. All student completion rate for each program must be ≥ to 60%
      3. WIOA student placement rate for each program must be ≥ to 40%
      4. All student placement rate for each program must be ≥ to 60%<sup>11</sup>
  2. Notify provider and State ETPL office of LWDB decision to approve, postpone, or deny within ten (10) business days of decision.

## 5. Registered Apprenticeship Programs (RAPs)

RAPs registered under the National Apprenticeship Act are not subject to the same application and performance information requirements or LWDB approval process as other training providers. To be included on the ETPL RAPs must express interest by opting-in.<sup>12</sup>

- A. RAPs must provide the following basic information:
  1. Occupations included within the RAP
  2. Name and address of the RAP sponsor

<sup>10</sup> WIOA §116(d)(4).20 CFR § 680.460 (f)(10).

<sup>11</sup> State of TN established additional performance measures.

<sup>12</sup> TEGL 8-19, p. I-4.

3. Name and address(es) of the related technical instruction provider(s) and the locations(s) of instruction if different from the program sponsor's address
4. Cost of the instruction, if the provider of the Related Technical Instruction is different from the program sponsor
5. Method and length of instruction
6. Number of active apprentices<sup>13</sup>
- B. RAPs are exempt from performance reporting requirements in WIOA § 116(d)(4) and 122 but may voluntarily report performance outcomes.<sup>14</sup>
- C. RAPs are maintained on the ETPL until:
  1. They are deregistered
  2. The RAP notifies the State that it no longer wants to be included
  3. The RAP is determined to have intentionally supplied inaccurate information or to have substantially violated any provision of title I WIOA or the WIOA regulations, including 29 CFR Part 38.<sup>15</sup>
- D. LWDB Responsibilities for RAPs
  1. LWDBs will act on a RAP's application within thirty (30) business days of receipt
  2. LWDBs will contact State ETPL office to verify the registration status of all RAPs that express interest in being included on the ETPL and re-verify no less than every two (2) years.<sup>16</sup>

## **6. Denial/Revocation of a Provider from the ETPL**

A training provider must meet performance and provide accurate information to the LWDB & the TDLWD. Eligibility may be denied/revoked for the following reasons:

- A. Denial based on Eligibility Requirements
  1. Provider does not have the appropriate State and/or Federal approval to operate
  2. The application is incomplete
  3. The program under consideration does not meet the definition of WIOA training services
  4. Program does not meet the established eligibility criteria or the established minimum performance levels
  5. Provider that intentionally supply inaccurate performance information
- B. Denial based on Training Provider Responsibilities
  1. Providers that do not submit annual performance data by the designated due date (exceptional circumstances beyond the provider's control, such as natural disasters, will be taken into account)<sup>17</sup>
  2. Providers that intentionally supply inaccurate performance information
  3. Providers that violate any provision of WIOA or its regulations, including 29 CFR part 38

<sup>13</sup> TEGL 8-19, p. I-4.

<sup>14</sup> TEGL 8-19, p. I-4.

<sup>15</sup> 20 CFR § 680.470 (b)(1-3); 29 CFR part 38 references nondiscrimination and equal opportunity provisions of WIOA

<sup>16</sup> TEGL 8-19, p. II-2.

<sup>17</sup> 20 CFR § 680.460(1)

4. Providers that fail to demonstrate the business capacity or integrity to successfully deliver training
- C. LWDB Denial/Revocation Responsibilities
  1. Though the recommendation to deny or revoke a provider/program may originate from either the LWDB or the TDLWD, the LWDB will be responsible for denying/revoking an ETP's eligibility
  2. Revocation is for a period not less than two years for providers that intentionally supply inaccurate information or substantially violate any provision of WIOA or its regulations, including 29 CFR part 38. The training provider is liable to repay all WIOA Title I training funds received during the period of noncompliance
  3. Providers that wish to appeal a denial or revocation of eligibility may appeal to the LWDB. After a decision has been rendered by the LWDB a provider may appeal to the State ETPL office.<sup>18</sup>

## 7. Appeals

If a program is denied eligibility, the training provider may take the following steps:

- A. Training providers have the right to appeal denial of eligibility status and may begin that process with the LWDB.
- B. If the LWDB does not reverse their original denial, the training provider may appeal to the State ETPL office.

## 8. Reciprocal Agreements

A LWDB can send a participant to training located in a different state if the training provider is on the ETPL in that state and the state has a reciprocal agreement with Tennessee.

- A. The State ETPL office will be responsible for entering into reciprocal agreements.
- B. All reciprocal agreements signed prior to June 30, 2023 will no longer be valid after that date.

## 9. Automatic Renewal

All policies approved by the State Workforce Development Board will be automatically renewed, on an annual basis, July 1 of every year. A list of policies that will be automatically renewed are submitted to the State Workforce Development Board during the meeting prior to July 1 every year. If a policy requires any type of substantial change, the policy will be resubmitted to the State Workforce Development Board for a new approval and will not be subject to the annual renewal process.

### Contact:

For any questions related to this policy, please contact the Program Integrity Unit at [Workforce.Board@tn.gov](mailto:Workforce.Board@tn.gov).



Tim Berry, State Workforce Development Board Chair

8-25-23

<sup>18</sup> 20 CFR § 680.480



## **Employment-Based Training Grants Policy (DRAFT)**

### **Purpose**

This policy ensures clarity and uniformity for Employment-Based Training Grants. Guideline and criteria are established within this policy for the following ETGs: Incumbent Worker Training, On the Job Training and Customized Training.

### **Background**

Employment-Based Training Grants (ETGs) tools utilized under the Workforce Innovation and Opportunity Act (WIOA) that are focused on meeting the unique needs of employers. The tools will be utilized, adapted, and combined with other services to provide employers flexibility in retaining or hiring a trained workforce. Though the services are designed with the employer in mind, the intent is to also provide trainees with opportunities to better their skill sets and opportunities within their industry.

### **Policy & Instructions**

The NMWB approves the funding amount of the Title I Adult and/or Dislocated Worker funds to be used for the grant awards. The staff to the NMWB are responsible for determining grant eligibility. Grants are awarded on a first come, first serve basis. Below are the requirements of the main three services to employers under WIOA formula funds. These services are for hiring new employees, retaining employees, or addressing the unique needs of the employers.

#### **1. Employment – Based Training Grant Program Requirements (ETGs)**

ETGs are tools utilized under the Workforce Innovation and Opportunity Act (WIOA) that are focused on meeting the unique needs of employers. The below tools will be utilized, adapted, and combined with other services to provide employers flexibility in retaining or hiring a trained workforce. Though the services are designed with the employer in mind, the intent is to also provide trainees with opportunities to better their skill sets and opportunities within their industry. Below are the requirements of the main three services to employers under WIOA formula funds. These services are for hiring new employees, or addressing the unique needs of the employers.

##### **1.1 On The Job Training (OJT)**

OJT is a form of work-based training provided to an eligible WIOA participant upon entry into employment and while engaged in paid work. OJTs are customized to address specific gaps in the trainee's knowledge or skills. Effective OJT programs ensure that participants are trained to perform specific job tasks. On an OJT, an employer can be reimbursed up to fifty percent. (50%) of the wage rate of the participant. LWDBS are permitted, under limited, specific, and well-documented circumstances, to increase the OJT wage reimbursement to seventy-five percent (75%). OJTs allow employer to train new hires for half the cost.

The allowable costs associated with an OJT are the salary of the trainee to the employer and any other

direct, allowable costs to the WIOA-enrolled individual such as books, supplies, etc. Any other additional payments to the employer outside of salary for training are unallowable.

#### **1.1(A) On the Job Training (OJT)**

- Newly hired individual
- A U.S. citizen or individual legally entitled to work in the US
- Age 18 or older
- Registered for Selective Service unless an exception is justified
- OJT hourly wage rate cap \$25 (reimbursement rate of \$12.50)
- Grant will reimburse employer up to 50% of wages

#### **1.2 Incumbent Worker Training (IWT)**

IWT is a tool used to help avert potential layoffs, or to increase the skill levels of employees so they can be promoted within the company and create backfill opportunities for the employers. This training is designed to meet the special requirements of an employer with commitment to retain employees or avert layoffs. The training funded under IWT would increase skills of the existing workforce, improve the efficiency of business operations and make the employee and employer more competitive in the current economic environment. Employees receiving the benefit of an IWT do not have to be enrolled as a WIOA Title I participant. LWDBs are allowed to reserve up to 20% of their federal award on IWTs.

Employers can apply for a maximum of \$25,000. If a consortium of businesses within a sector requests funds, there will be a cap of \$75,000. A consortium must consist of at least three (3) employers. Employers are required to provide an in-kind match based upon the size of their workforce.

##### **1.2(A) Employee Eligibility Requirements for IWT**

- Must be a full time permanent employee
- Have an established employment history with employer receiving the grant for (6) months or more

##### **1.2(B) Employer Required Match**

- 10% match if employer has 50 or less employees
- 25% match if employer has 51-100 employees
- 50% match if employer has more than 100 employees

##### **1.2(C) Reimbursable Training Expenses**

- For training provided internally by the employer the actual wages of internal trainers, up to \$50/hr
- Internal training curriculum development (Limited up to 5% of the total allowable cost of IWT and requires supporting documentation.)
- Textbooks and manuals
- Material and supplies
- Tuition expense for instruction provided by an institution regulated by the Tennessee Higher Education Commission.
- The actual cost of contracted training, instructors, programs, equipment rental, and classroom rental.

##### **1.2(D) Non-Reimbursable Costs**

- Employee Wages
- Purchase of capital equipment



- Travel and food expenses of trainers or trainees
- Assessment, testing, and certification fees
- Advertising and recruiting
- Language training
- Assisting or resisting union organizations or labor disputes
- Any costs not approved in the final contractual agreement

### **1.3 Customized Training Programs**

Customized training is one of several types of allowable training identified in WIOA section 134(c)(3)(d). This training may be offered to individuals under LWDB-funded programs designed to meet the needs of a specific employer or cohort of employers. The purpose of this training must seek to provide for the introduction of new technologies, new productions or service procedures, upgrading existing skills, or other appropriate purposes as identified by NMTWB. The employer has a responsibility under this form of training to commit to hiring anyone who receives this training and to pay a “significant cost” of the training as identified by the NMTWB. NMTWB will require that the employer pay a minimum of 50% of customized training costs.

As identified in this policy, customized training can take on a variety of forms as long as the core requirements are met. Training typically provided under WIOA such as OJTs, ITAs, or IWTs may be adapted and provided in an alternative form to meet the needs of the employer.

Other processes can be considered as well, such as contract training. Contract training provides NMTWB the flexibility to contract directly with institutions of higher education or training providers. Specifically, the NMTWB may award a contract to a training provider if the Board determines that it would facilitate the training of multiple individuals in high-demand occupations and meet the unique needs of the employer.

The benefit of contract training is the utilization of cohorts which allow more flexibility in serving an employer. Not all employees of a company may be eligible for WIOA formula funds but may still require the same training as employees who do meet the eligibility standards of WIOA formula funds. NMTWB may utilize cohorts to reduce the cost of training by developing customized training plans for trainees that will also allow non-WIOA eligible employees to receive the same training opportunity.

All participants who receive customized training under WIOA formula funds must be enrolled in a WIOA Title I program, must not be earning a self-sufficient wage, and must be trained for the purposes established in 20 CFR 690.710(c).

Allowable and unallowable costs will depend on the type of customized that is provided. For customized training in the form of an OJT and IWT, the applicable sections in this policy will provide the allowability of costs. However, generally with customized training the allowability of costs are costs directly associated with the training. Allowable costs considered for customized training can include but are not limited to, instructor training-related wages, curriculum development, textbooks, materials, and supplies. Unallowable costs include but are not limited to, trainee benefits, purchase of capital equipment, foreign travel, and costs that are not directly related to customized training for eligible individuals under Title 1.

### **1.3(A) Items to be considered when entering into training agreement with employer**

- The occupation for which training will be provided;
- The skills and competencies to be achieved and the length of time for the training (days/weeks);
- The number of employees to be trained;
- The employer's assurance that customized training is needed, based upon the individual skill set of trainees;
- The method and maximum amount of reimbursement (employer match);
- Job description(s) of the trainees and a training outline
- The cost and documented description of any supportive services that may be needed;
- Commitment by the employer to maintain the employment of employees receiving the training;
- Other appropriate training outcomes related to the training (i.e. increases in earnings)

## **2. Employer Qualifications**

For an employer to qualify for an ETG they must meet all of the following:

- Must be classified as a Tennessee for-profit business or non-profit business.
- Must be in operation for at least one year (this does not apply to OJT employers)
- If relocation results in loss of jobs, must not have relocated to the training location in the one-hundred and twenty (120) days preceding the training.
- Must not rely on ETG funding to relocate business operations.
- Must employ at least 5 full time employees
- Must be current on all local, state, and federal tax obligations.
- Must be a viable business
- Must not have received an ETG in the twelve (12) months prior to the start date of the proposed new grant, unless the requirement is waived by TDWLD.
- Must have the consent of any trainee's collective bargaining unit.
- A group of Employers may form a consortium for ETG purposes, but each Employer in the consortium must meet the above requirements.

## **3. Grant Award Requirements & Grant Award Procedures**

### **3.1 (A) Grant Award Requirements**

- Businesses approved for funds must enter into a contract. The contract commits the business to complete the training as proposed in its application, as well as committing to compliance with all applicable Federal, State and Local laws.
- Approved budget items are reimbursed upon presentation of adequate documentation of the training and evidence that the training expense incurred has been paid.
- Businesses must submit monthly reimbursement requests in the timely manner with required support documentation. Businesses will also have the option to submit one invoice at the conclusion of training.
- Businesses will keep accurate records of the project implementation process and certify that all information provided, for the purpose of requesting reimbursements and reporting training activity is accurate and true.

### **3.1 (B) Additional Grant Award Procedures**

- Cost per participant will be considered when evaluating the effectiveness and efficiency of the award.
- Does the total amount of the grant divided by the number of participants represent a cost

equivalent to other training options in the local workforce development area?

- Is the training provided in a demand occupation?
- Has the company/trainer demonstrated successful performance previously?

### **3.1 (C)Monitoring**

- Participant data will be reviewed for completeness and eligibility prior to payment of any invoice
- Supporting documentation must be provided with each invoice demonstrating appropriate and allowable expenses and employer match
- For trainer wages, documents providing direct expense (gross wages paid) to grant must be provided
- NMWB staff will review submitted data and invoices for accuracy
- NMWB staff will have regular contact with grant recipient to ensure proper information is being maintained
- Lack of response by grant recipient to the NMWB staff may result in termination of the contract

### **References**

20 CFR 682.210(b); 20 CFR 680.810; 20 CFR 680.710(c); 20 CFR 680.700(a); 20 CFT 680.790; WIOA Section 134(d)(4)(D)(iii); WIOA Section 134(d)(4)(iii)(C) and (D); 20 CFR 680.830; 20 CFR.680.840; 20 CFR 680.760; 20 CFR 663.715(b); 20 CFR 680.760(b); 20 CFR 680.760(c); TEGL 19-16; 20 CFR 680.770(a); 20 CFR 680.770(c); WIOA Section 194(10); WIOA Section 181(d)(2); WIOA Section 181(d)(1); 20 CFR 680.810(c); 20 CFR 680.810; 20 CFR 663.720(a); 20 CFR 663.710(a); WIOA Section 2(1) & (3)(24); 20 CFR 680.810(b)&(c); 20 CFR 680.700(b); 2 CFR 200.331

Authorized by:

Approved by:

\_\_\_\_\_  
Marla Rye, Executive Director      Date

\_\_\_\_\_  
John Zobl, Chairman      Date

# State Workforce Development Board Policy – Employment-Based Training Grants

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## **Executive Summary:**

This policy provides details specific business funding tools our workforce system uses to best serve employers in the State of Tennessee. The focus of this policy is to guide Local Workforce Development Boards (LWDBs) on the many ways that employers can receive a benefit from Workforce Innovation and Opportunity Act (WIOA) funding and the workforce system in general. The specific tools to serve employers in this policy are considered Employment-based Training Grants. However, these tools can be adapted or combined with other services in the workforce system, such as Registered Apprenticeships and Consolidated Business Grants, to best serve the needs of employers. This policy establishes the requirements that must be met when using WIOA formula funding to provide Employment-Based Training Grants; however, there may be special instances where the release of State or State Reserve funding may allow LWDBs to utilize even more innovative practices to serve employers through these tools.<sup>1</sup> The allowability of innovative practices with State or State Reserve funding will be released through contracts, funding announcements, or memorandums released by TDLWD.

## **Frequently Asked Questions:**

1. What is general the purpose of this policy?  
To establish the tools and guidelines that can be utilized by LWDBs to best serve employers.
2. What are the notable guidelines conveyed within this policy?
  - Types of services to employers; OJT, IWT, and Customized Training
  - Allowability of funds
  - Eligibility of employers and job seekers/employees
  - Requirements for LWDB policies
3. Have there been any changes since the last policy? If so, describe the modification(s).  
This is a new policy.
4. What must the Local Workforce Development Board do to meet the requirements of this policy?
  - Adhere to eligibility requirements when providing funds to employers.
  - Create a local policy that includes items detailed in this policy.

<sup>1</sup> 20 CFR 682.210(b)



**State of Tennessee  
State Workforce Development Board**

220 French Landing Drive, 4A

Nashville, TN 37243-1002

(615) 741-0409

# State Workforce Development Board Policy

## *Employment-Based Training Grants*

**Effective Date: (To be presented November 3, 2023)**

**Expiration Date: Auto-renewal**

### **Purpose**

This policy ensures clarity and uniformity for Employment-based Training Grants. This policy furthers the State Workforce Development Board's commitment to Employment-based Training, including Incumbent Worker, On the Job, and Customized Training.

### **Scope**

- Workforce Innovation and Opportunity Act Core Partners
- American Job Center Partners
- State Workforce Development Board
- Local Workforce Development Board
- Fiscal Agents
- One-Stop Operator
- Regional Councils

### **Contents**

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## Background

This policy provides details business funding tools our workforce system uses to best serve employers in the State of Tennessee. The focus of this policy is to guide Local Workforce Development Boards (LWDBs) on the many ways that employers can receive a benefit from Workforce Innovation and Opportunity Act (WIOA) funding and the workforce system in general. The specific tools to serve employers in this policy are considered Employment-based Training Grants. However, these tools can be adapted or combined with other services in the workforce system, such as Registered Apprenticeships and Consolidated Business Grants, to best serve the needs of employers. This policy establishes the requirements that must be met when using WIOA formula funding to provide Employment-Based Training Grants; however, there may be special instances where the release of State or State Reserve funding may allow LWDBs to utilize even more innovative practices to serve employers through these tools.<sup>1</sup> The allowability of innovative practices with State or State Reserve funding will be released through contracts, funding announcements, or memorandums released by TDLWD.

## Definitions

Employment-based Training Grant (ETG) – ETGs are employer-driven and designed to meet the unique needs of employers. ETGs provide subsidies to employers who agree to train employees and retain them upon completion. ETGs are useful tools in building pipelines of skilled workers. These services include Incumbent Worker Training (IWT); On-the-Job Training (OJT); or Customized Training grants to an Employer.<sup>2</sup>

<sup>1</sup> [20 CFR 682.210\(b\)](#)

<sup>2</sup> [20 CFR § 680.810](#)

Regional Employer – an Employer with multiple locations in different Local Workforce Development Areas (LWDA) or one who employs its workforce from multiple LWDAs.

Self-Sufficient Wage- is the determination by the LWDB on what the economic self-sufficiency threshold is for residents in the Local Workforce Development Area (LWDA) upon entering a training program. This determination of a self-sufficient wage is relative to the percentage of the HHS poverty level and can typically be found through a living wage calculator.

Viable Business – a business not expected to close or cease operation and able to meet its cost share requirements.<sup>3</sup>

## 1. Employment-Based Training Grant Program Requirements

ETG are tools utilized under the Workforce Innovation and Opportunity Act (WIOA) that are focused on meeting the unique needs of employers. The below tools will be utilized, adapted, and combined with other services to provide employers flexibility in retaining or hiring a trained workforce. Though the services are designed with the employer in mind, the intent is to also provide trainees with opportunities to better their skill sets and opportunities within their industry. Below are the requirements of the main three services to employers under WIOA formula funds. These services are for hiring new employees, retaining employees, or addressing the unique needs of the employers.

### 1.1 On the Job Training (OJT)<sup>4</sup>

OJT is a form of work-based training provided to an eligible WIOA participant upon entry into employment and while engaged in paid work. OJTs are customized to address specific gaps in the trainee's knowledge or skills that are inhibiting their ability to perform assigned duties fully and adequately. Effective OJT programs ensure that participants are trained to perform specific job tasks. The term 'on-the-job training' means training by an employer that is provided to a paid participant for the purpose of:

- The introduction of new technologies;
- The introduction to new production or service procedures;
- Upgrading to new jobs that require additional skills;
- Workplace literacy;
- Other appropriate purposes identified by the LWDB.<sup>5</sup>

An OJT can be used for the reimbursement to the Employer of up to fifty (50) percent of the wage rate of the participant.<sup>6</sup> LWDBs are permitted, under limited, specific, and well-documented circumstances, to increase OJT wage reimbursement to seventy-five percent (75%).

<sup>3</sup> An Employer in bankruptcy or recently discharged from bankruptcy is not ineligible automatically, but the LWDB must be certain that the Employer will continue to operate and be able and liable to meet its cost-sharing obligations.

<sup>4</sup> This policy is focused on OJT grants to Employers. This policy does not apply to Pre-apprenticeship, Apprenticeship, [Registered Apprenticeship Programs \(RAP\)](#), and [Eligible Training Program List \(ETPL\)](#).

<sup>5</sup> [20 CFR §680.710\(c\)](#)

<sup>6</sup> [20 CFR §680.700\(a\)](#)

OJT is often utilized for new employees; however, OJT can be utilized for employed workers. For employed workers, they must be a WIOA participant and must not be earning a self-sufficient wage, prior to becoming an OJT participant, as determined by Local Workforce Development Board (LWDB) policy.

The allowable costs associated with an OJT are the salary of the trainee to the employer and any other direct, allowable costs to the WIOA-enrolled individual, such as books, supplies, etc. Any other additional payments to the employer outside of salary for training are unallowable.

## 1.2 Incumbent Worker Training (IWT)

IWT is a tool used to help avert potential layoffs, or to increase the skill levels of employees so they can be promoted within the company and create backfill opportunities for the employers. This training is designed to meet the special requirements of an employer with a commitment to retain employees or avert layoffs.<sup>7</sup> IWT is training for employees who have been employed for six (6) months or more by the Employer. Employees receiving the benefit of an IWT do not have to be enrolled as a WIOA Title I participant unless they are receiving additional services through WIOA Title I.

Employers must pay the salaries of trainees during IWT. Wages are not an allowable grant expense. However, wages may count towards the Employer's share of IWT training.<sup>8</sup> The Employer's share of IWT varies from 10% to 50% depending on the size of the Employer.<sup>9</sup>

LWDBs are allowed to reserve up to 20% of their federal award on IWTs. However, LWDBs must not spend more than 20% of their federal award on IWTs.

IWT Grant Allowable Costs include:

- The actual cost of contracted training, instructors, programs, equipment rental, and classroom rental, as well as purchased textbooks and supplies.
- Tuition expense for instruction provided by an institution regulated by the Tennessee Higher Education Commission
- For training provided internally by the Employer:
  - Actual wages of internal trainers, up to \$50/hr.
  - Internal training curriculum development. (Limited up to 5% of the total allowable cost of IWT and requires supporting documentation.)

IWT Grant Unallowable Costs include:

- Employee wages
- Equipment usable outside of training.
- Travel expenses of any kind.
- Assessment, testing, and certification fees.
- Advertising and recruitment

<sup>7</sup> [20 CFR § 680.790](#)

<sup>8</sup> WIOA § 134(d)(4)(D)(iii)

<sup>9</sup> WIOA § 134(d)(4)(ii)(C) and (D).



- Language training.
- Assisting or resisting union organizations or labor disputes.<sup>10</sup>
- Any costs not in the grant budget approved by the LWDB.

### 1.3 Customized Training Programs

Customized Training<sup>11</sup> is one of several types of allowable training identified in WIOA section 134(c)(3)(d). This training may be offered to individuals under LWDB-funded programs designed to meet the needs of a specific employer or cohort of employers. The purpose of this training must seek to provide for the introduction of new technologies, new productions or service procedures, upgrading existing skills, or other appropriate purposes as identified by the LWDB<sup>12</sup>. The employer has a responsibility under this form of training to commit to hiring anyone who receives this training<sup>13</sup> and to pay a “significant cost”<sup>14</sup> of the training as identified by the LWDB.

As identified in this policy, customized training can take on a variety of forms as long as the core requirements are met. Training typically provided under WIOA such as OJTs, ITAs, or IWTs may be adapted and provided in an alternative form to meet the needs of the employer.

Other processes can be considered as well, such as contract training. Contract training provides local boards the flexibility to contract directly with institutions of higher education or training providers. Specifically, a LWDB may award a contract to a training provider if the LWDB determines that it would facilitate the training of multiple individuals in high-demand occupations and meet the unique needs of an employer.

The benefit of contract training is the utilization of cohorts which allow more flexibility in serving an employer. Not all employees of a company may be eligible for WIOA formula funds but may still require the same training as employees who do meet the eligibility standards of WIOA formula funds. LWDBs may utilize cohorts to reduce the cost of training by developing customized training plans for trainees that will also allow non-WIOA-eligible employees to receive the same training opportunity.<sup>15</sup>

All participants who receive customized training under WIOA formula funds must be enrolled in a WIOA Title I program<sup>16</sup>, must not be earning a self-sufficient wage<sup>17</sup>, and must be trained for the purposes established in 20 CFR § 680.710(c).<sup>18</sup>

Allowable and unallowable costs will depend on the type of customized that is provided. For customized training in a form of an OJT and IWT, the applicable sections in this policy will provide the allowability of costs. However, generally with customized training the allowability of costs are costs

<sup>10</sup> [20 CFR §680.830](#); [680.840](#)

<sup>11</sup> [20 CFR §680.760](#)

<sup>12</sup> [20 CFR 680.710\(c\)](#)

<sup>13</sup> [20 CFR § 663.715\(b\)](#) & [680.760\(b\)](#)

<sup>14</sup> [20 CFR 680.760\(c\)](#)

<sup>15</sup> WIOA funds cannot be used to pay for training of non-WIOA students.

<sup>16</sup> [TEGL 19-16](#)

<sup>17</sup> [20 CFR 680.770\(a\)](#)

<sup>18</sup> [20 CFR 680.770\(c\)](#)

directly associated with the training. Allowable costs considered for customized training can include but are not limited to, instructor training-related wages, curriculum development, and textbooks, materials, and supplies. Unallowable costs include but are not limited to, trainee benefits, purchase of capital equipment, foreign travel, and costs that are not directly related to customized training for eligible individuals under Title I.

When entering into a training agreement with an employer, the following items must be considered:

- a. The occupation for which training will be provided;
- b. The skills and competencies to be achieved and the length of time for the training (days/weeks);
- c. The number of employees to be trained;
- d. The employer's assurance that customized training is needed, based upon the individual skill sets of trainees;
- e. The method and maximum amount of reimbursement (employer match);
- f. Job description(s) of the trainees and a training outline;
- g. The cost and documented description of any supportive services that may be needed;
- h. Commitment by the employer to maintain the employment of employees receiving the training; and
- i. Other appropriate training outcomes related to the training (i.e. increases in earnings).

## 2. Employer Qualifications

For an employer to qualify for an ETG, it must meet all the following:

- Must be classified as a Tennessee for-profit business or non-profit business.<sup>19</sup>
- Must be in operation for at least one year.
- If relocation results in loss of jobs, must not have relocated to the training location in the one-hundred and twenty (120) days preceding the training.<sup>20</sup>
- Must not rely on ETG funding to relocate business operations<sup>21</sup>
- Must employ at least five full-time employees.
- Must be current on all local, state, and federal tax obligations.
- Must be a Viable Business.
- Not received an ETG in the twelve (12) months prior to the start date of the proposed new grant, unless the requirement is waived by TDWLD.
- Have the consent of any trainee's collective bargaining unit.

The LWDB may consider other relevant criteria in considering Employer eligibility, as stated in its ETG award policy.<sup>22</sup> A group of Employers may form a consortium for ETG purposes, but each Employer in the consortium must meet these requirements.

<sup>19</sup> Public sector employers are not eligible for these funds per WIOA Sec. 194(10).

<sup>20</sup> WIOA §181(d)(2)

<sup>21</sup> WIOA § 181(d)(1)

<sup>22</sup> [20 CFR §680.810\(c\)](#)

### 3. Local Workforce Development Board Responsibility

Local Workforce Development Boards (LWDBs) are required to determine the eligibility of the Employer and trainee before awarding an ETG.<sup>23</sup> For OJT and Customized Training, the LWDB must enroll any trainees as WIOA participants under Title I and must determine the trainee's eligibility for WIOA Title I.

LWDB's must develop an ETG award policy that properly includes:

- Setting the LWDB's Self-Sustaining Wage<sup>24</sup>
- Prioritization to serving populations with barriers to employment.<sup>25</sup>
- Making a cost-benefit analysis.<sup>26</sup>
- Rating and considering the Employer's grant performance history.<sup>27</sup>
- Consideration of other existing training opportunities.<sup>28</sup>
- Invoicing frequency and required documentation.
- Regional goals as outlined by the Regional Plan and additional goals agreed upon by the Regional Planning Council (RPC).
- Service to Regional Employers, to include:
  - Sharing Resources and Coordination with LWDBs within the respective region
  - Adaptation or waivers to LWDB policy to be consistent with LWDBs in the respective region.
  - Define how the LWDB will come into agreement with other LWDBs within the respective region for consistent service delivery.
- Definition of "Significant Cost of Training by an Employer"
- Any other appropriate considerations.<sup>29</sup>

### 4. Template Forms and Grant Roles<sup>30</sup>

TDLWD staff will provide template ETG forms as guidance. These templates may include application forms, contracts, reports, and application evaluation forms for use by LWDBs in administering ETGs.

Use of the templates is not mandatory. However, ETGs, contracts, forms, records, and reports must use these defined roles:

- The LWDB (or its fiscal agent) is the Grantor.
- The Employer is always the subrecipient Grantee.
- Any outside training service or training supply provider is a contractor of the Grantee.
- Trainees are considered the beneficiary participants.

<sup>23</sup> [20 CFR § 680.810.](#)

<sup>24</sup> [20 CFR § 663.720\(a\); 680.710\(a\); 680.770\(a\).](#)

<sup>25</sup> WIOA §2(1) & (3)(24);

<sup>26</sup> [20 CFR 680.810\(b\)&\(c\)](#)

<sup>27</sup> [20 CFR § 680.700\(b\);](#)

<sup>28</sup> [20 CFR § 680.810\(c\)](#)

<sup>29</sup> [20 CFR 680.710\(c\); 680.770\(c\)](#)

<sup>30</sup> See [2 CFR §200.331](#)

## 5. Automatic Renewal

All policies approved by the State Workforce Development Board will be automatically renewed, on an annual basis, on July 1 of every year, unless federal regulations come into conflict. A list of policies that will be automatically renewed is submitted to the State Workforce Development Board during the meeting before July 1 every year.

### Contact

For any questions related to this policy, please contact the Program Integrity Unit at [Workforce.Board@tn.gov](mailto:Workforce.Board@tn.gov).

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Tim Berry, State Workforce Development Board Chair

New Providers Requiring Board Approval for addition to the ETPL										
Provider Name	Provider Main Address	Years in Business	Approval Agency	Approval Documented						
Wings of Eagles Aviation	200 Airport Road Clarksville, TN 37042	16	THEC	THEC Exempt Authorized Institution						
New Programs Requiring Board Approval for addition to the ETPL										
Provider Name	Provider Main Address	Program ID	Program Name	CIP Code	Total Cost	Job Outlook	Credential Earned	Program Length	Sector Strategy	
Wings of Eagles Aviation	200 Airport Road Clarksville, TN 37042	1011058	Certified Flight Instructor, ASEL	490108	\$14,333.00	Bright Outlook Locally & Nationally	FAA Certified Flight Instructor. Airplane Single Engine Lane	6 Weeks	Transportation	
Wings of Eagles Aviation	200 Airport Road Clarksville, TN 37042	1011056	Commercial Pilot Additional Rating, ASEL	490102	\$16,947.00	Bright Outlook Locally & Nationally	FAA ASEL Commercial Pilot	55 Hours	Transportation	
Wings of Eagles Aviation	200 Airport Road Clarksville, TN 37042	1011055	Airplane Single Engine Land Commercial Certification	490102	\$33,712.00	Bright Outlook Locally & Nationally	FAA ASEL Commercial Pilot	120 Hours	Transportation	
Wings of Eagles Aviation	200 Airport Road Clarksville, TN 37042	1011057	Multi-Engine Commercial Pilot Add- On	490102	\$6,673.00	Bright Outlook Locally & Nationally	FAA AMEL Commercial Pilot	4 Weeks	Transportation	
TCAT Dickson	740 Highway 46 Dickson, TN 37055	1011077	Criminal Justice: Correctional Officer	430102	\$3,314.00	Bright Outlook Locally & Nationally	Certificate	8 Months	Government	
Austin Peay State University	601 College Street Clarksville, TN 37044	1011137	Certified Physical Therapy Aide (GES-189)	512605	\$2,145.00	Bright Outlook Nationally	Physical Therapy Technician/Aide Certification (PTTC) through AMCA	9 Months	Healthcare	
TCAT Nashville	100 White Bridge Road Nashville, TN 37209	1011138	Building Construction (If I Had a Hammer)	460415	\$4,000.00	Bright Outlook Locally & Nationally	NCCER	3 Weeks	Construction	
Savvy Coders	501 Union Street Nashville, TN 37219	1010982	Data Analytics and Python	307101	\$8,500.00	Bright Outlook Locally & Nationally	ICAgile Certified Professional Certification	12 Weeks	Information Technology	

Former Programs Requiring Board Approval for ETPL Addition										
Provider Name	Provider Main Address	Program ID	Program Name	CIP Code	Total Cost	Job Outlook	Credential Earned	Program Length	Sector Strategy	Notes
TCAT Nashville	100 White Bridge Road Nashville, TN 37209	98422	Cosmetology	120401	\$5,995.00	Bright Outlook Locally & Nationally	Diploma	15 Months	Personal Health	Previously removed due to lack of enrollments
Tennessee Language Center	220 French Landing Drive Suite 1B Nashville, TN 37243	1010653	Medical Interpreter Training Course	160103	\$1,107.00	Bright Outlook Locally & Nationally	Certificate that leads to Certification	18 Weeks	Healthcare	Previously removed due to lack of enrollments
Tennessee State University	3500 John A Merritt Blvd Nashville, TN 37243	1007392	Advanced Medical Interpreter	160103	\$3,195.00	Bright Outlook Locally & Nationally	Certificate that leads to Certification	12 Months	Healthcare	Missed subsequent review due date 02/09/2022
Tennessee State University	3500 John A Merritt Blvd Nashville, TN 37243	511801	Optician Certification Training Course	1006089	\$1,995.00	Bright Outlook Locally	Certified Optician	6 Months	Healthcare	Missed subsequent review due date 08/26/2021
Tennessee State University	3500 John A Merritt Blvd Nashville, TN 37243	1007391	NASM Certified Nutrition Coach (Exam Included)	190599	\$1,295.00	Bright Outlook Locally & Nationally	NASM Certified Nutrition Coach	26 Weeks	Healthcare	Missed subsequent review due date 02/01/2022
Tennessee State University	3500 John A Merritt Blvd Nashville, TN 37243	100866	Advanced Hospital Coding and CCS Prep (Voucher included)	519999	\$1,895.00	Bright Outlook Locally & Nationally	Certified Coding Specialist	6 Months	Healthcare	Missed subsequent review due date 02/25/2021
Tennessee State University	3500 John A Merritt Blvd Nashville, TN 37243	1005640	Lean Six Sigma Green Belt with Black Belt with 1-on-1 Project Coaching (Exam Cost)	520205	\$3,445.00	Bright Outlook Locally & Nationally	CSSC Six Sigma Green and Black Belt Certification	12 Months	Information Technology	Missed the subsequent review due date 03/31/2022
Tennessee State University	3500 John A Merritt Blvd Nashville, TN 37243	1005641	Lean Six Sigma Green Belt and Black Belt	520205	\$2,545.00	Bright Outlook Locally & Nationally	CSSC Six Sigma Green and Black Belt Certification	12 Months	Information Technology	Missed the subsequent review due date 03/31/2022
Tennessee State University	3500 John A Merritt Blvd Nashville, TN 37243	1005639	Certified Six Sigma Black Belt	520205	\$1,995.00	Bright Outlook Locally & Nationally	CSSC Six Sigma Black Belt Certification	6 Months	Information Technology	Missed the subsequent review due date 03/31/2022

ETPL Truck Driving Audit				
PY 2022	Prior to Audit		After Audit	
Armored Trucking Academy	45 WIOA Students \$216,315.00 \$4,800/student			
	# of students	Percent	# of students	Percent
	17	37%	30	66%
Completion (CDL) Rate	17	37%	30	66%
Placement Rate	5	11%	30	66%
160 Driving Academy	106 WIOA Students \$535,000.00 \$5,000/student			
	# of students	Percent	# of students	Percent
	27	25%	30	28%
Completion (CDL) Rate	27	25%	30	28%
Placement Rate	17	16%	36	33%
Lockhart Trucking Academy	66 WIOA Students \$279,950.00 \$5,400/student			
	# of students	Percent	# of students	Percent
	37	56%	40	60%
Completion (CDL) Rate	37	56%	40	60%
Placement Rate	23	34%	41	62%
Tennessee CDL School	113 WIOA Students \$564,548.00 \$4,996/student			
	# of students	Percent	# of students	Percent
	25	22%	56	49%
Completion (CDL) Rate	25	22%	56	49%
Placement Rate	13	11%	56	49%
Truck Driver Institute	30 WIOA Students \$149,850.00 \$4,995/student			
	# of students	Percent	# of students	Percent
	12	40%	24	80%
Completion (CDL) Rate	12	40%	24	80%
Placement Rate	3	10%	17	56%
United Truck Driving School	170 WIOA Students \$1,006,572.00 \$5,995/student			
	# of students	Percent	# of students	Percent
	115	67%	139	81%
Completion (CDL) Rate	115	67%	139	81%
Placement Rate	31	18%	128	75%

Northern Middle Program Year July 1, 2023 to June 30, 2024								
Incumbent Worker Training (IWT) Grants								
	County Location	Employer	Employees Trained	Contract Start Date	Contract End Date	Contract Amount	Amount Expended	NOTES
	Rutherford	Wallenius Wilhelmsen Solutions	10	7/1/2023	5/31/2023	\$25,000.00		
	Rutherford	Jaymes Academy	10	10/1/2023	5/31/2024	\$8,500.00		
	Montgomery	Automotive Tech Development Trainingg (ATDT)	8	9/1/2023	5/31/2024	\$45,066.88		
								</





## Summer Youth Employment Program (SYEP) 2023

LWDA	Phase I	Phase II	Total	%
GM	0	0	0	0%
NW	17	106	123	15%
SW	3	69	72	9%
SM	39	57	96	12%
UC	8	0	8	1%
SE	56	73	129	16%
E	13	0	13	1%
NE	0	0	0	0%
NM	133	245	378	46%
<b>Total</b>	<b>269</b>	<b>550</b>	<b>819</b>	<b>100%</b>



EDSI 23-24 Incentive Quarterly Benchmarks		2023		
Matrix:		Sep 30 (QTR 1)		
		Goal	Actual	%
Enrollments	A/DW	210	301	143.33%
	Total Youth	69	114	165.22%
	In-School	14	7	50.00%
*Exits (80% of enrollments)	A/DW	168	75	44.64%
	Youth	55	55	99.64%
Positive Exits # (85% of Exits)		Goal	Actual	Percent
	A/DW	143	67	46.92%
	Youth	47	54	115.09%
		Exits	Positive	Percent
**Actual Positive Exit Rate	A/DW	75	67	89.33%
	Youth	55	54	98.18%
Placement Wage		Goal	Actual	Percent
	A/DW	\$ 16.50	\$ 21.75	131.82%
	Youth	\$ 13.00	\$ 17.20	132.31%

MAC Goals 2023-2024		2023		
Matrix:		Sep 30 (QTR 1)		
		Goal	Actual	%
Enrollments	ISY	20	32	160%
	OSY	15	28	187%
	Total	35	60	171%
Exits				
	Youth	28	49	175%
Positive Exits		Goal	Actual	Percent
	Youth	24	27	88.1%
**Actual Positive Exit Rate				
		Exits	Positive	Percent
		49	27	55.1%
Placement Wage				
	Youth	\$ 13.00	\$ 16.80	129.2%

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

PY23 WIOA Core Performance Measures	Targets 100%	Targets 90%			
			Q1 PY 23	Q2 PY 23	
Adult Measures			EST	EST	EST
Exiters					
Participants Served					
Employment Rate 2nd Quarter after exit	81.5%	73.35%	85.2%	80.4%	
Employment Rate 4th Quarter after exit	81.0%	72.90%	86.1%	79.5%	
Median Earnings 2 <sup>nd</sup> Quarter after exit	7,025	\$ 6,323	\$ 8,678	\$ 8,772	
Credential Attainment w/in 4 Quarters after exit	69.5%	62.55%	72.2%	74.0%	
Measurable Skills Gains	63.5%	57.15%	61.1%	57.5%	
Dislocated Worker					
Exiters					
Participants Served					
Employment Rate 2nd Quarter after exit	83.5%	75.15%	87.9%	82.6%	
Employment Rate 4th Quarter after exit	81.0%	72.90%	86.2%	81.1%	
Median Earnings 2 <sup>nd</sup> Quarter after exit	7,944	\$ 7,150	\$ 10,753	\$ 10,237	
Credential Attainment w/in 4 Quarters after exit	65.5%	58.95%	68.5%	68.2%	
Measurable Skills Gains	61.2%	55.08%	68.5%	64.5%	
Youth					
Exiters					
Participants Served					
Employment Rate 2nd Quarter after exit	78.0%	70.20%	89.3%	84.6%	
Employment Rate 4th Quarter after exit	77.0%	69.30%	87.20%	83.3%	
Median Earnings 2 <sup>nd</sup> Quarter after exit	3,800	\$ 3,420	\$ 5,874	\$ 6,172	
Credential Attainment w/in 4 Quarters after exit	65.5%	58.95%	77.6%	73.3%	
Measurable Skills Gains	55.0%	49.50%	55.0%	53.1%	
GREEN-Passing at 100% of Goal					
YELLOW-Passing at 90% of goal					
Red-Failing at less than 90% of goal					



2023

Small Town  
STARTUP



2023

# ANNUAL REPORT HIGHLIGHTS



# FROM THE YOUTH TO THE MATURE - WE HELPED THEM BOTH.

We've had an incredible year working alongside American Job Centers to boost their digital presence. We've captured the essence of who they are through photoshoots, heard their stories through podcasts, broadcasted their message through email and got the word out through designed printed assets.

This year, we've reached out to the youth through our pilot program this summer, helping your organization drive hundreds and hundreds of applications in. We also worked on the flip side with seniors coming back into the workforce at 55+, driving results through traditional print media, mailers and flyers for the SCSEP program.

**Wherever a job-seeker or employer is looking for services we provide, we want to be there.**



Enclosed is a recap of our time together, and a proposal for a new year. We hope to continue this partnership with you.

We believe keeping American Job Centers services front and center is more important now than ever, especially as job growth begins to slow from its breakneck pace in previous years, leaving more individuals in need of your help.



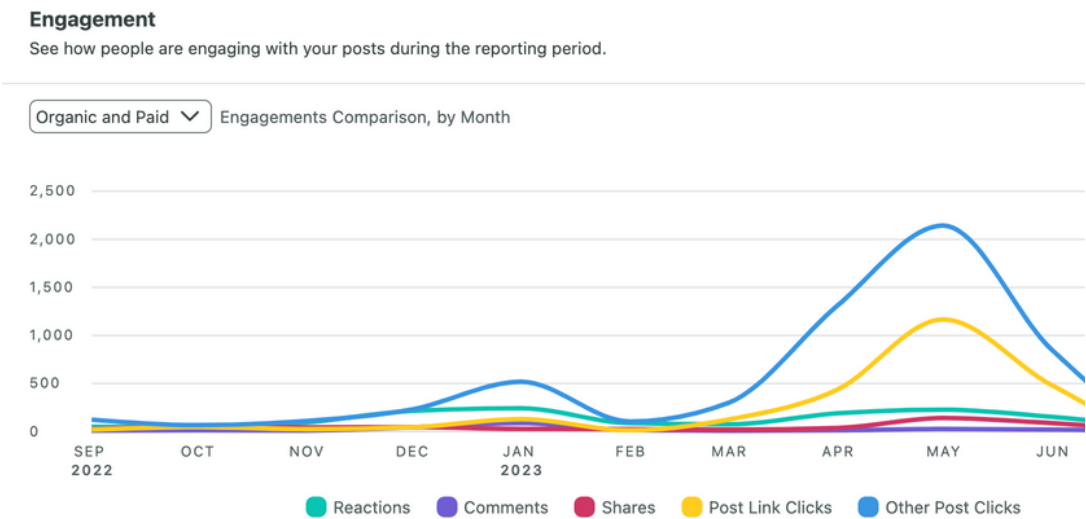
CAMPAIGN SPECIFIC TO Q2 2023




# YOUTH PILOT PROGRAM

We had a phenomenal pilot of our "Now Hiring" program, which helped usher in nearly 800 applicants from all over the state to our youth workers program! In any economy, 800 applicants in such a short time period is quite the feat!

The layered approach to this campaign helped push our engagement on social media, especially, too. We moved paid advertising to push this most significantly on social media, and the content skyrocketed, with some days bringing in more than 2,000 engagements across the board!







# SCSEP PROGRAM HELP

Outside of our contract, but determined to win, we took on a traditional marketing campaign with the latest SCSEP campaign in partnership with American Job Centers.

Together with Sherry Maynard and Natalie McLimore, we developed a traditional mailing and flyer campaign to attract individuals 55+ to join the program. We focused on getting these flyers in areas where individuals in the targeted age ranges would most likely congregate: churches, community centers, senior centers, etc.

Our team researched the counties participating and scouted out at least 3-5 locations per county to send the posters and postcards to. Then, we handed off the finalized products and lists to the Workforce Essentials team for the final touch of printing and mailing.

All in all, we were able to reach more than 50 locations throughout the participating counties that we could target for participants.

# SCSEP PROGRAM - ASSET EXAMPLES



**YOU**  
*can help your  
community  
thrive.*

*55 years old or older  
and looking for work?*

*We can help.*

*Learn new skills,  
earn income and be  
part of a caring  
community.*

*Learn more now by  
giving us a call:*

*Workforce Essentials  
615-664-8564*



**YOU**  
*still have so  
much to give.*

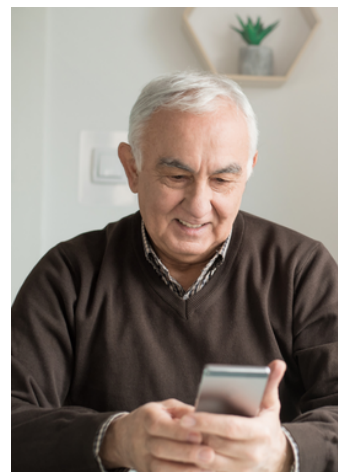
*55 years old or older and  
looking for work?*

*We can help.*

*Learn new skills, earn  
income and be part of a  
caring community.*

*Learn more now by giving  
us a call:*

*Workforce Essentials  
615-664-8564*



**YOU**  
*can feel the joy  
of something  
new.*

*55 years old or older and  
looking for work?*

*We can help.*

*Learn new skills, earn  
income and be part of a  
caring community.*

*Learn more now by giving  
us a call:*

*Workforce Essentials  
615-664-8564*





# PROPOSAL FOR 2024

After a successful first year together, we'd be honored to continue our partnership. We've determined cost effective ways to continue our work together, and be equally as impactful. Please find them outlined below:

- Social Media Marketing, Management & Content Creation: Continue social media management on both Facebook and Instagram, with quarterly photoshoots to keep content fresh. In this year, we want to focus more on Stories and top-level content to stay in front of our ideal visitors as much as possible.
- Email Marketing: Continue email marketing which has a high open rate and engagement rate, and is a great way to push in-person events and visits to American Job Centers.
- Paid Advertising on Meta: Work alongside American Job Centers to secure a grant from Meta for ad placement, therefore reducing your budget for ads drastically (upwards of \$5,000).
- Digital Presence Management: Continue to monitor and manage your digital presence across all platforms that we have secured, including Yelp, Google My Business, and Facebook and Instagram pages.
- Graphic Design – Digital and Print (6 hours per month): We found in the last year that there were opportunities to provide better campaign reach with graphic design (SCSEP being a prime example). Moving forward, we'd like to work this into the contract to ensure we delegate time each month to creating blended campaigns where/when needed for maximum results. (Unused hours will roll over each month).

Total monthly cost: \$4,100, inclusive of Small Town Startup's work and paid media.

Term: 12 months (December 1, 2023 – December 31, 2024) with a 60 day cancellation policy written into the contract.

Billing: To be billed on the 1st of each month.

# Your Communication Team

**LISA ARNOLD, ACCOUNT LEAD**

Lisa is responsible for the overall health of the relationship between Workforce Essentials and Small Town Startup. She leads the way and provides the vision to help Workforce Essentials meet their goals through digital marketing. You can email her anytime at [Lisa@smalltownstartup.com](mailto:Lisa@smalltownstartup.com).

**MADDISON FAUTH,  
TRAFFIC COORDINATOR**

For checking in, scheduling photoshoots, scheduling podcast recordings, reviewing results and more, Maddison is ready to help.

Email her anytime at  
[Maddison@smalltownstartup.com](mailto:Maddison@smalltownstartup.com)

**ABIGAIL BROWN, CONTENT STRATEGIST**

For last minute content changes, questions or concerns, Abigail is your lead contact. You can reach her at [Abigail@smalltownstartup.com](mailto:Abigail@smalltownstartup.com).

**In case of an emergency or urgent request, please always email  
[support@smalltownstartup.com](mailto:support@smalltownstartup.com)**