



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

**Quarterly Board Meeting**  
**May 12, 2021**  
**11:30 a.m. to 1:00 p.m.**  
**In Person @ TCAT Smyrna**  
**663 Ken Pilkerton Dr. Smyrna**  
[Click here for Zoom link](#)  
**Tel: +1 312 626 6799**  
**Meeting ID: 836 3182 8617**  
**Passcode: 539950**

## **AGENDA**

**Call Meeting to Order**

John Zobl

**Approval of Minutes**

John Zobl

**Recognition of Board Members & Mayors**

Marla Rye

**Contractor Report - Q&A:**

EDSI

Kevin Schnieders, CEO

MAC

Dr. Cynthia Croom, Exec. Director

**Strategic Priorities:**

➡ ***Manage Board funds to support Career Pathways***

Financial Report

Ginger Fussell

➡ ***Connect People with Career Opportunities:***

One-Stop-Operator Report

George Phillips

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

State-Wide Manufacture Project

Marla Rye

McGruder & Napier Center Certification

Marla Rye

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

KPI Performance Goals/WIOA Performance Measures

Andrea Dillard

Eligible Training Provider Monitoring and Program Approval

Freda Herndon

New Policies:

a. Priority of Service

Andrea Dillard

b. Grievance and Complaint

c. Support Services

d. TAA Co-Enrollment Process

➡ **Adjourn:**

John Zobl

Zoom Link: <https://us02web.zoom.us/j/83631828617?pwd=SnpOMTlhZEUrOU41RFI3azR1Vyt4UT09>

**Upcoming Meetings-Mark Your Calendar**

August 11, 2021 | November 10, 2021 | February 9, 2022

**Northern Middle TN Workforce Board Meeting  
February 10, 2021  
11:30 a.m. to 12:30 p.m.**

<b>Present Members:</b>	<b>Members Absent:</b>	<b>Guest and Staff:</b>
Howard Bradley	Keith Carnahan	Marla Rye
John Alexander	James Harper	Renea Rosson
Jon Hunter	Tony Adams	George Phillips
Charles Story	Kristi Spurgeon	John Watz
Paul Webb	Dan Ryan	Christina Dusenberry
Mark Peed	Richie Brandon	Danielle Ellis
Seth Thurman	David Rutledge	Ellen Zinkiewicz
Carol Puryear		Meagan Dobbins
Bo Callis		Jane Hamrick
Dan Caldwell		James Starnes
Tylesha McCray		Ginger Fussell
Jennifer Hobbs		Andrea Dillard
GC Hixson		Renee Hollis
John Zobl		Freda Herndon
		Sherry Maynard
		Mayor Stephen Chambers
		Larry Mangrum
		Mayor Kerry R. McCarver
		Rob Dancer
		C Brown
		Mayor Robin Brandon
		Dr. Rubin Cockrell
		Ginger Hausser
		Casey Deel
		Aaron Wilson
		Ellen Gomez
		Susan Cowden
		Mayor Randall Hutto
		James Starnes
		Ankur Singla

The Northern Middle Tennessee Workforce Development Board met virtually on Wednesday, February 10, 2021, at 11:30 a.m.

The meeting was called to order, and Chairman John Zobl made opening remarks. Marla welcomed everyone to the meeting. John Zobl asked for a motion to approve the minutes. Mark Peed made the motion to approve. GC Hixon seconded, and the vote was unanimous. Marla welcomed and thanked Mayors Chambers, McCarver, and Brandon for attending the meeting in support of the board. She then

thanked the board members at the February 2 Finance Committee meeting, John Alexander, those who assisted her with Paul Webb's virtual orientation, and Howard Bradley for visiting the American Job Center and talking with Marla about services.

Marla reported that during December, unemployment rates rose slightly, but Tennessee was number seven of the top ten lowest unemployment rates. The U.S. is at 6.7%, Tennessee is at 6.4%, and Northern Middle is at 5.3%. In Northern Middle, the lowest rate is Williamson County at 4.2%, and the highest rate is Houston County at 7.6%. Stewart and Montgomery Counties are at 6.8%. All other counties are at 5% or below. This leaves about 60,000 on the unemployment rolls in Northern Middle.

#### **Workforce Study:**

Marla started by thanking those members who joined the virtual meeting through the Nashville Chamber of Commerce's Talent Solution forum on January 13. There are hyperlinks in the meeting materials to the workforce study presentation and the complete study. Marla reported that the workforce study reinforced the knowledge that healthcare, information technology, business services, corporate headquarters, and advanced manufacturing are at the top of our sector strategy as showing a lot of opportunities. The executive summary pointed out that many entry-level positions are subject to automation and may disappear, especially with the proposed minimum wage increase. This means we would need to do more to upskill and micro-credential those individuals that are entry-level. The study targeted five different groups and had action items for each group to include employers, the education system, the workforce system, policymakers, and leadership in our local communities and economic development. Marla encouraged those who are a part of this group to look at the workforce study and take action.

Marla reported the study pointed out that Tennessee has the need to offer digital literacy classes due to people having a lack of digital readiness. This is one of the areas EDSI is looking at as a point of action. The study also pointed out the disparity in earnings and education along with racial and ethnic backgrounds. Marla added that she had been asked to participate in a racial equity 2030 planning grant in conjunction with the Middle Tennessee Urban League. Finally, Marla expressed appreciation to the Nashville Chamber of Commerce for conducting the study.

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

Ginger reported that the quarter ended December 2020 was very strong from an expenditure standpoint. We exceeded what we utilized in quarter one by over half a million dollars. The increase related to additional funding received due to COVID-19. This funding was from an additional National Dislocated Worker grant, more funding under the existing disaster relief contract, and the CARES grant. In quarter one, \$3.4 million was spent, and in quarter two, \$3.9 million was spent for a total of \$7.4 spent through December 2020. With a budget of \$15.1 million, we have utilized 44.7% halfway through the year. With \$2.5 million additional funding received, our budget figure for expenditures for this fiscal year is up to \$17.6 million. We have utilized 41.9%. Last week the Finance Committee approved the addition to the budget. The Dislocated Worker grant needs to be spent by June 30, 2022. With the money added to the 20-21 fiscal budget, it can be spent sooner than later if there is a need. Marla added that the Nashville School System is looking to partner with Workforce to hire sanitation & COVID monitors. Therefore, the spending of the budget money could increase.

Ginger reports that Mid-Cumberland has been the career provider for the last 18 months. Their contract was \$4.4 million for the six month extension ending December 31, 2020, of which 82.5% was utilized. Quarter 2 declined by about \$88,000 compared to quarter 1, but increase slightly compared to the same quarter last year. Ginger extended appreciation to Mid-Cumberland for their service and activities. They will continue as the One-Stop-Operator. The previous One-Stop Operator contract was also extended for the six months ending December 31, 2020, and they utilized 30.3% of that six-month contract which was under what was budgeted due to some unfilled staff positions. Ginger said that Mid-Cumberland contributed to our minimum participant cost rate, which measures how many dollars go directly to participants. They had a strong month in September and were close to their target in October. As we move towards transition, the percentages decline. There were 557 in enrollment in the first quarter, but in quarter two, there were only 251. Ginger expressed concern that there will be lower dollar amounts in quarter three. The new providers are ramping up, and she believes they will work to make good things happen in quarter three despite the enrollment challenges.

Next, Ginger reported on Campbell Strong. Campbell Strong's project has been extended from two to three years. We've expended 77.2% of a \$7.7 million project. Enrollment has been expanded to a goal of 2000, with actual at 74.1%. We've spent 80.8% of our direct participant budget through December. We have nine months remaining on the overall project.

Northern Middle's state measured minimum participant cost rate overall calculates at 44.87%. With additional grant activity (such as National Dislocated Worker and COVID-related grants) and a strong push with New Skills November, you'll see that our minimum participant cost rate is almost 60% spending \$4.1 million directly to participants.

Ginger then gave a monitoring report. Mid-Cumberland, the outgoing provider, has had some disallowed costs primarily related to youth, and she thinks the underlying driver of that is staff turnover and training. There have been many meetings during the transition period with both the outgoing provider and the incoming provider to ensure a smooth transition. We continue to monitor Campbell Strong expenditures. We have switched to a quarterly reporting basis with the state related to our monitoring.

Ginger was pleased to report that we have had our 2020 external audit completed, and John Zobl stated the audit was very good. Ankur Singla with Thurman Campbell group attended this meeting to give a summary of the audit. Anker started by expressing his appreciation for having the opportunity to work with Northern Middle and Workforce Essentials. He said that we had a great management team. Ankur then reviewed the auditor's report. Based on their audit of the financial statements, they provided an unmodified opinion which means all is well. The Yellow Book Report, which is for nonprofits and government entities, makes auditors understand the internal controls and compliance requirements. They understood the internal controls based on their audit, and they did not find any material or significant deficiencies. They did not find noncompliance with grant contracts, laws or regulations. A single audit report is required when an entity spends over \$750,000 in federal funding. The single audit has its compliance requirements. It was found that Northern Middle Workforce Board met all the federal compliance requirements. Overall, there were no findings reported and no questioned costs reported. Northern Middle is considered a low-risk auditee because Northern Middle has been audited

in the past few years, and there have been no findings and no material questions. When an entity meets those requirements, it can be considered a low-risk auditee which reduces the level of work auditors have to do. Charles Story congratulated all those who had a hand in this. He stated he had been on several boards and hasn't seen one that didn't have any findings at all. Ginger complimented Thurman Campbell for their hard work and patience through restructures, realignments, and changes. John Zobl gave accolades to everyone for their hard work.

Bo Callis asked Ginger about the disallowed expenses and if they were paid or will be recovered. Ginger assured him that Mid-Cumberland has always been responsive and quick to address any disallowed cost issue and would quickly reduce or refund the charges. This was done by reducing their billing in the final invoice.

John Zobl asked if we were thinking about or had a plan for carryover, and Ginger responded that carryover was factored into the 20-21 budget to allow for funds to be available into the first quarter of the next fiscal year.

Ginger then informed the board that we were under a three-year contract with Thurman Campbell. However, last week the Finance Committee agreed to extend their contract for one more year since they have done a great job and since we will also be monitoring new service providers. The Finance Committee approved the extension and accepted the financial report and the budget revision of the \$2.5 million.

Bo Callis moved to ratify the decision to extend the contract. Mark Peed seconded the motion. With no discussion, the board approved the motion.

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

George Phillips reports on the One-Stop-Operator dashboard. He first highlights the New Skills November, saying it was a very successful initiative. It offered upskilling options and short-term courses to individuals. In the partner program, as of December 31, the total Title One active cases were up to 1,936. The Adult Ed report shows an increase in the number of new employers that registered for jobs within Tennessee, indicating that there are a lot of jobs available. The Voc Rehab reports show that the AJCs had 24,478 visitors to the offices in the 13 counties. Last year the number of visitors was around 32,000. The lower number is due to the holidays and COVID. Davidson County has had the most significant drop in unemployment, going from 7.5% to 4.7%. In June, their unemployment was 12.1%, so that was a significant drop in the last six months. There are two new career service providers. One is EDSI, and MAC is providing the youth services in Davidson County.

Danielle Ellis reports that EDSI is enrolling new customers and working to instill best practices on identifying participants who are a great match for the services offered to ensure that they are being directed to the appropriate services. One strategy is to ensure the team understands the difference between eligibility versus suitability and redirect participants who may not be best suited for training right away but may also need additional services or job placement services. Team members are still being trained to use the systems, and EDSI anticipates the numbers will increase. At the close of the report, there were 22 enrollments, but at the close of business on Friday, there were 28, with 18 going

through the Q&A process. EDSI continues to get great feedback with regards to its quality assurance practices. The aim is to get 75% positive outcome. To improve the client experience EDSI has looked at the orientation session and figured out a way to streamline the process so that continuity is created in the messaging of the offered services. One orientation presentation has been created that is used across all the comprehensive sites so everyone who is facilitated in orientation is giving the same message. This way the same message is going to all participants across the counties.

Danielle explains that a workshop calendar has been distributed with topics clients need. It was found that many clients struggle with basic computer skills so a basic computer skills workshop will be offered as well as a resume series, digital footprint, and financial literacy plus others. The Step It Up to Thrive curriculum will be introduced to the youth participants. It helps to drive the growth mindset within young adults by covering four areas. The areas are called SPARK (what makes them feel excited), growth mindset as well as indicators of thriving and goal management. This platform is used to empower the youth participants and make great motivators and mentors of our youth advocates.

Next, Christina Dusenberry reports that EDSI is implementing the employer-driven model. Relationships in the area will be built with partners, employers, and participants. Connections will be built between them all as well as analyzing what is heard in the field and bringing that information to a place where they can be strategic and putting the right people with the right opportunities. They plan to be the first stop for both participants and employers to develop the workforce to a place where it also attracts new businesses who know they'll be responsive and more business will be attracted by word of mouth.

Danielle added that they had been actively working with state partners to develop some best practices as it relates to business development within the region. They recognize the great work the state has done and continue to engage employers. There is room for everyone to work collaboratively to serve employers in order to bridge the gap between employers and participants who are in need of a job.

Charles Story asked if they had an overall plan for marketing the services they provide to the area. Danielle explained that they do create their own marketing materials. They are working in collaboration with the state partners to see what is already being distributed and will then use the same language to spread their message. They are also building relationships with the employers to understand what their needs are and how they can assist them with the goal of having them as a repeat customer.

Ellen Zinkiewicz with MAC reported they are looking to integrate WIOA Youth Services in Davidson County with the resources that are already available through the Metro Action Commission. MAC is administering many of the Federal CARES dollars to provide rent relief and to help pay utilities. Not all young people are impacted by COVID but are struggling to pay rent because they are also trying to pay tuition, or their resources are pulled in many different directions. Within the first four weeks of operations, 13 referrals were fast-tracked to Headstart to get some young moms connected with free childcare resources. A fast-track process was developed so that young people can go to the head of the list for before or aftercare, enabling some participants to pursue their educational and work goals while having free ongoing childcare.

Ellen explains they have also been working on integrated partnerships with other community organizations serving Davidson County. MAC intends to be an intentional and thoughtful partner for organizations that serve young people and continue to put young people at the center to walk alongside that young person on the path they would choose. They want to be sure that the coaches for the young people have their best interests in mind.

Lastly, Ellen reports that they have been using a family-centered coaching model to train their staff. This puts the young person at the center while recognizing the young person is a parent, a student, and someone's child. The staff needs to realize that they may have a lot of providers at play and need to help bring together those providers to coordinate so that the young person can get the benefit of being engaged with multiple providers who will help them with the coordination and organization, so they don't have to do it on their own.

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

Andrea Dillard reports that we have gotten quite a bit of extra money with an additional grant that had to be spent in a very short period of time. The National Dislocated Worker grant is ongoing through June of 2022. Individuals are on a paid work experience with city and county governments assisting them and reopening their facilities, meeting the CDC requirements of sanitation and cleanliness. These jobs will last approximately six months and pay \$15-\$18. The objective is for the person to have secured full-time employment in the private or public sector by the time the temporary job has ended.

Andrea then went on to report about the CARES Act money. It was received in September and was to be expended by the end of December. We worked with 13 different employers and expended 98% of the funds. We have used more of our funds than any other area across the state. Andrea complimented those 13 employers for getting all of their documentation or training completed in a very short period of time.

Lastly, Andrea reported on the New Skills November. We worked with eight different local training providers to provide short-term training opportunities of all different types taking place in 10 of our 13 counties for individuals affected by COVID. We expended about 92%-95% of the funds that were allocated. One hundred forty-one workers were served. With incumbent workers, the total was close to 400. The CARES Act totaled about 600,000 hours. John Zobl commented that he knew of three employers in Sumner County that benefited from the CARES Act and said that it had a very meaningful impact on their business and each of them was appreciative.

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

Renee Hollis reported that most of the programs did not meet their goals and that is due to COVID. Goals were set in January of 2020, and a pandemic was not expected. The goal for adult and dislocated workers was 1,524. We reached 987, which is nearly 65%. With our youth, we had a goal of 519. We reached 381, which is 73.4%. This year, some of the previously tracking programs have been removed, so there is a smaller group to work with. New lower goals were set for this year. The adult dislocated worker target is now 995, and youth is 403. Marla, the team, and the state all came together and set these goals. It is felt they are a little more reasonable, considering we are still in the middle of a pandemic. These new goals will be sent out to the contractors. Marla added that during KPI

negotiations, a lower percentage (13%) was set because they realized contractors would be new and getting up and running. Therefore, the second-quarter goal was set higher.

Freda Herndon reported that they have been working on cleaning up their Eligible Training Provider lists. We've gone from about 1,328 programs to less than 700. Any program that was not active and did not have any WIOA enrollments have been deactivated. Once the clean-up is finished, the federal monitoring will get started. Freda and John Watz will meet with providers to explain what will be required. ETPL will have consistent reporting. Now there is a more manageable list and a list that reflects our sector strategies. It will be more streamlined and manageable for our participants to navigate as well as for our partners. Freda asked for board approval on two programs. There was a TSU program that was an error and needed to be removed. There was a date discrepancy. A new program with Tennessee Professional Training Institute has submitted and gotten approval for a phlebotomy course. It is one of our sector strategies. This program has a bright outlook locally and nationally. Freda recommends approval from the board. GC Hixson moved to approve the motion. John Alexander seconded the motion. With no discussion, the board voted to approve the motion.

#### **Old Business:**

Marla Rye reported that an offender project dealing with Project Return out of Nashville had been mutually canceled due to COVID. The contract can be revisited at a later date. In addition, Voc Rehab has closed some centers and has allowed us to look at some of their furniture to possibly use, which will cut down on some costs. Marla Rye concluded the meeting by recognizing the mayors that joined the meeting and informing the next board meeting is May 12, 2021. With no other business, Howard Bradley moved to adjourn the meeting. Mark Peed seconded the motion. Chairman Zobl adjourned the meeting.

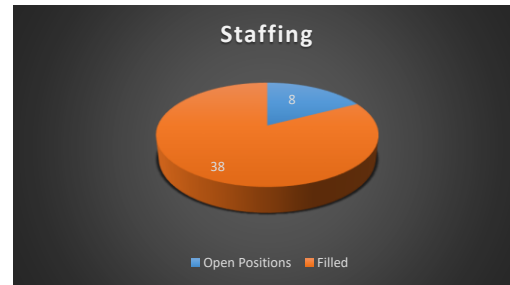
Name (Original Name)	User Email	Total Duration (Minutes)	Guest
Howard Bradley		89	Yes
Marla Rye	mrye@workforceessentials.com	86	No
John Alexander	john.alexander@tn.gov	86	Yes
Jon Hunter		84	Yes
Renea Rosson		84	Yes
Charles Story		83	Yes
Paul Webb		82	Yes
Guest		82	Yes
George Phillips		81	Yes
19319053510 (Renea Rosson)		81	Yes
Stephen Chambers		81	Yes
Larry Mangrum		81	Yes
K R McCarver (Mayor Kerry R. McCarver)		80	Yes
Mark Peed		80	Yes
Seth Harper Thurman		79	Yes
John Watz		79	Yes
Rob Dancer		79	Yes
Carol Puryear		79	Yes
C Brown		79	Yes
Robin Brandon		79	Yes
Bo Callis		79	Yes
Christina Dusenberry		78	Yes
Danielle Ellis	dellis@edsisolutions.com	78	Yes
JO		3	Yes
Dan Caldwell		77	Yes
Tylesha McCray	tylesha.mccray@tn.gov	77	Yes
Dr. Rubin Cockrell		76	Yes
16159137157 (Susan Cowden)		71	Yes
Ellen Zinkiewicz Nashville		76	Yes
Jennifer Hobbs		75	Yes
GC Hixson	gchixson@doingbiz.org	74	Yes
Rubin Cockrell	cockrellr@apsu.edu	1	Yes
Ginger Hausser	ginger.hausser@nscc.edu	73	Yes
Casey Deel		73	Yes
Meagan Dobbins		72	Yes
jhamrick		71	Yes
Jon's iPhone		67	Yes
James Starnes		67	Yes
Randall Hutto (Aaron Wilson)	pickettruckrumc@gmail.com	67	Yes
16158503928 (James Starnes)		66	Yes
16158503912 (Jane Hamrick)		63	Yes
Ellen Gomez @ TN_Pathways		40	Yes

## EDSI Implementation Dashboard-April 28, 2021

### 1. Staffing

Open Positions	Filled	Total Positions	% Vacant
8	38	46	17.4%

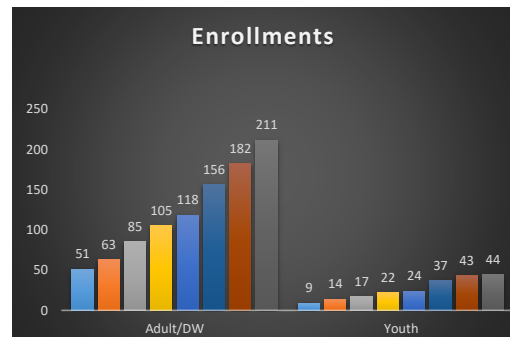
1	Career Advisor -Ad/DW	Sumner	Declined
2	Business Services	Sumner/Trousdale	
3	Community Outreach Coordinator		
4	Career Advisor -Ad/DW	Nashville	Resignation
5	RESEA Advisor	Robertson	Declined
6	Business Services	Williamson	
7	Business Services	Davidson	Resignation
8	Youth Advocate	Sumner	Resignation



### 2. Enrollments (cumulative)

Week	Adult/DW	Youth	Total	Change
Goal (6/30)	455	112	567	
3/3/2021	51	9	60	
3/10/2021	63	14	77	17
3/15/2021	85	17	102	25
3/24/2021	105	22	127	25
3/31/2021	118	24	142	15
4/7/2021	139	32	171	29
4/13/2021	156	37	193	22
4/20/2021	182	43	225	32
4/28/2021	211	44	255	30

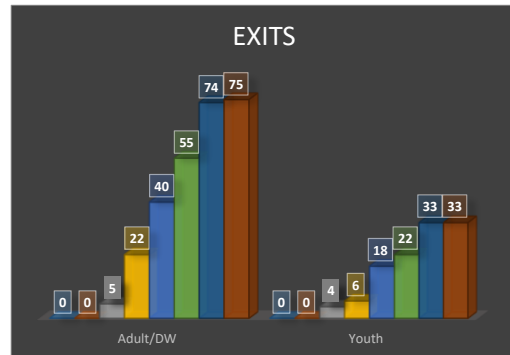
\*9 weeks-      46%      39%      45%  
                          27                   8                   35



### 3. Exits

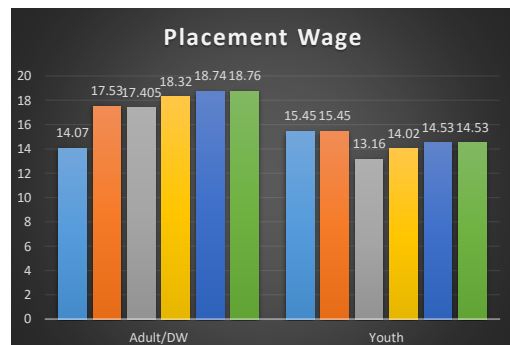
Week	Adult/DW	Youth	Total	Change
Goal	228	56	284	
3/3/2021	0	0	0	0
3/10/2021	0	0	0	0
3/15/2021	5	4	9	9
3/24/2021	22	6	28	19
3/31/2021	40	18	58	30
4/7/2021	55	22	77	19
4/20/2021	74	33	107	30
4/28/2021	75	33	108	1

Positive      83%      64%  
 9 weeks      17.0      2.6



### 4. Placement Wage

Week	Adult/DW	Youth	Total	Change
Goal	\$ 15.00	\$ 10.00		
3/3/2021	0	0		
3/10/2021	0	0		
3/17/2021	14.07	15.45		
3/24/2021	17.53	15.45		
3/31/2021	17.405	13.16		
4/7/2021	18.32	14.02		
4/20/2021	18.74	14.53		
4/20/2021	18.76	14.53		



### 4. MPCR

Week	Adult	DW	Youth	Total
Goal	50%	50%	50%	
January	0%	0%	17%	
February	16%	35%	16%	-
March	18%	29%	11%	
Cumulative	12%	23%	14%	

# MAC Implementation Dashboard-April 28, 2021

## 1. Staffing

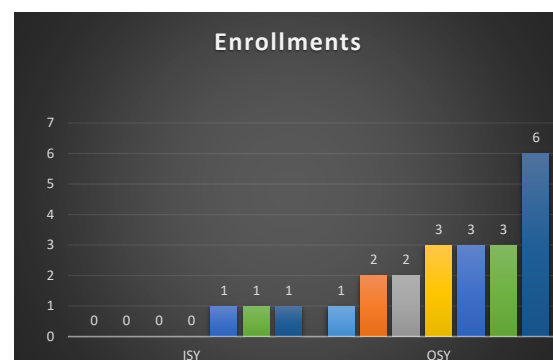
Open Positions	Filled	Total Positions	% Vacant
0	3	3	0.0%



## 2. Enrollments (cumulative)

Week	ISY	OSY	Total	Change
Goal (6/30)	65	50	115	
3/3/2021	0	1	1	
3/10/2021	0	2	2	1
3/15/2021	0	2	2	-
3/24/2021	0	3	3	1
3/31/2021	1	3	4	1
4/7/2021	1	3	4	-
4/13/2021	1	6	7	3
4/20/2021	1	9	10	3
4/28/2021	3	9	12	2

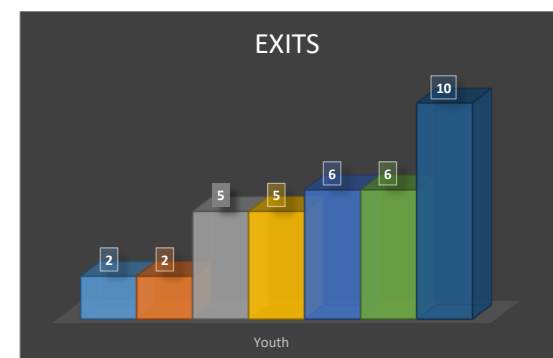
	5%	18%	10%
*10 weeks-	6.4	4.1	11



## 3. Exits

Week	Youth	Total	Change
Goal		0	
3/3/2021	2	2	
3/10/2021	2	2	-
3/15/2021	5	5	
3/24/2021	5	5	
3/31/2021	6	6	
4/7/2021	6	6	
4/13/2021	10	10	
4/20/2021	10	10	
4/20/2021	10	10	

Positive 80%



## 4. Placement Wage

Week	Youth	Total	Change
Goal	\$ 9.00		
3/3/2021			
3/10/2021			-
3/17/2021			
3/24/2021			
3/31/2021			
4/7/2021			
4/13/2021	\$ 12.48		
4/20/2021	\$12.48		
4/28/2021	\$ 12.48		

## 4. MPCR

Week	MPCR	Work Exp	ISY
Goal	50%	25%	40%
January	100%	85%	0%
February	19%	17%	1%
March	15%	6%	6%
Cumulative	17%	9%	4%

Educational Data Systems Inc.  
WIOA Adult Dislocated Worker & Youth Program  
Desk Review Action Plan: Performance  
April 2021

Executive Summary: EDSI is committed to ensuring that the Northern Middle Tennessee American Job Centers successfully reach all the performance benchmarks within our contract. This plan will address the below factors that impacted our ability to meet our performance goals for quarter one and highlight our successes, best practices, and lessons learned.

- Performance (1/2021-2/2021)
- Staffing

**Performance Overview**

ENROLLMENTS (Cumulative)				
Week	Adult/DW	Youth	Total	Change
Goal (6/30)	455	112	567	
3/3/2021	51	9	60	
3/10/2021	63	14	77	17
3/15/2021	85	17	102	25
3/24/2021	105	22	127	25
3/31/2021	118	24	142	15
4/7/2021	139	32	171	29
	26%	21%	25%	
*12 weeks	26	7		

EXITS				
Week	Adult/DW	Youth	Total	Change
Goal	228	56	284	
3/3/2021	0	0	0	
3/10/2021	0	0	0	
3/15/2021	5	4	9	
3/24/2021	22	6	28	
3/31/2021	40	18	58	
4/7/2021	55	22	77	
Positive	89%	64%		
*12 weeks	14	3		

PLACEMENT WAGE				
Week	Adult/DW	Youth	Total	Change
Goal	\$15.00	\$10.00		
3/3/2021	0	0		
3/10/2021	0	0		
3/15/2021	\$14.07	\$15.45		
3/24/2021	\$17.53	\$15.45		
3/31/2021	\$17.41	\$13.16		
4/7/2021	\$18.32	\$14.02		

After reflecting on the performance data for Q1, we identified the following as the main contributing factors to the outcomes:

- Provider transition (IE: Operational Set-Up, Level Setting, File Sharing) delayed the start of enrollments
  - The team began enrolling participants during the last week of January.
- Staffing Levels - Management, Project Accountant, Career Advisor, and Youth Advocate positions remained unfilled for several weeks.
- Knowledge Gaps – Many of the incumbent staff had varying levels of understanding of the WIOA policies and Workforce Board expectations
- Delay in processing Supportive Services in VOS – We did not have our Project Accountant hired until March, who needed to be trained in order to enter payments in VOS and Concur. We also needed to
- Center Traffic - Traffic numbers in some counties have been extremely low due to a decrease in engagement with community partners as well as multiple changes in the American Job Center's allowable capacity due to COVID-19. Customers have not had consistent access to the AJCs throughout the pandemic.
- Staff Morale - Many team members inherited large caseloads that were hard to manage, had concerns about the number of providers they have worked under, and were/are finding it hard to adjust to new operation flows.

### Staffing and Recruitment

We recognize that our recruitment plan and hiring process has had a major impact on the overall success of our contract startup and transition. Our Senior Leadership is currently working to address the nationwide recruiting challenges that have impacted EDSI's overall hiring timelines. We will also continue to engage our community partners and local colleges and advertise opportunities locally with the use of Jobs4TN.

The success of our programs can be attributed to the great work of our local Program Managers and leaders who are responsible for overseeing operations, implementation and improvement of processes, staff training, and support, as well as business development and community building.

Our transition began without these key management positions filled, which had a major impact on operations, performance, staff morale, and turnover. Our Regional Director of Operations will

continue to support the local leaders in developing long-term strategies to boost morale, retain great talent and ensure the overall success of the program.

## **Orientation & Intake**

At the start of the program in January, we conducted two weeks of training and brought in a transition team to assist our new team members navigating EDSI's processes. During this period, a Value Stream Mapping session was conducted with the team to establish a process flow for each job center. Through this process, leadership was able to quickly identify knowledge gaps that were contributing to a lack of continuity in service delivery across the AJC's.

After assessing the knowledge gaps and operational challenges across the region, we identified opportunities for improvement that could be put into two main categories:

- Enrollment Process
  - Eligibility (We also identified the need to establish a more efficient way to determine eligibility for new clients)
- Orientation
  - Intake (We worked with the Department of Labor Site Leads to ensure that a referral form was being used in every AJC to streamline referrals between all organizations)

Working with each center and in collaboration with the Department of Labor Site Leads in Rutherford, Davidson, and Montgomery Counties, we were able to individually develop a new process flow for intake and orientation that met the unique needs of each center but provided continuity.

Every comprehensive center now has an orientation schedule and a newly updated orientation presentation which was distributed to ensure that all participants across the region receive the same information and message during this engagement.

We immediately saw positive results in the overall flow in Davidson County, which contributed to the team's ability to meet and exceed the enrollment goal of 60 for Q1. It is important to note that Davidson County received an influx of foot traffic during the last two weeks in January when the centers re-opened. This created capacity issues; the team quickly pivoted and began offering two orientations per week, allowing them to schedule fewer participants for each orientation and establish a streamlined system for scheduling intake appointments.

## **Enrollments**

Although we did not meet our overall goal of 250 enrollments, we did have success in our affiliate centers in Cheatham, Dickson, Stewart, Wilson, and Trousdale. Upon examining the performance in these centers, we have learned that much of this success was attributed to the following:

- Long-standing relationships between the Career Advisors and Youth Advocates and the internal and external partners. Having great relationships within the community increases referrals and helps to expand our marketing reach.
- Identifying organizations that are willing to assist with our marketing efforts (i.e., distributing or hanging our flyers and brochures in their lobbies or information centers)
- Engaging with customers in the resource room

- Speaking in the HiSet orientations and/or setting up a referral system with Adult Ed and RESEA

We did not meet our ADW and Youth enrollment goals in Montgomery, Robertson, Sumner, Rutherford, and Williamson Counties due to lack of staff, low traffic, and significantly larger caseloads. We have filled all Career Advisor and Youth Advocate positions in all the counties except Sumner, for which we are actively recruiting. The team has identified community organizations within each of these counties that will be contacted to establish a referral system or AJC presence within their spaces. This will include working closely with the CTE Coordinators to create a schedule for our Youth Advocates to provide services within the K-12 school systems.

We also intend to increase awareness of services by distributing flyers to local food banks, title loan/cash advance businesses, laundry mats, utility assistance agencies, libraries, community centers, etc.

### Montgomery County

While short-staffed achieved 50% of the ADW and Youth enrollment goals, which was expected due to being down one Career Advisor and Youth Advocate. Now that the team is fully staffed, we anticipate that the ADW and Youth enrollment goals will be met, and additional exits will be completed.

#### Enrollment Goal:

- ADW - 50 Enrollments
  - Achieve at a pace of 17/month
- Youth – 23 Enrollments
  - Achieve at a pace of 8/month

Target Partners: Adult education, Women's Shelter, H.O.P.E., Youth Villages, Salvation Army, Manna Café, Library, Health Department, Habitat for Humanity, VIP Children Clinic, churches, local ETPL's, DCS, Tennessee Children's Home, Transitioning Soldiers, Goodwill fairs, and Campbell Strong.

### Robertson County

The biggest challenge has been traffic. To address this, we have created a plan to increase internal referrals from onsite partners and offsite engagements within the community.

#### Enrollment Goal:

- ADW - 10 Enrollments
- Youth – 4 Enrollments

Target Partners: Local ministry programs, TN College of Applied Technology, Volunteer State at Highland Crest, Skill Up TN, SNAP, Adult Ed, local high schools, Open Door Pregnancy Center, Centerstone, YMCA – YCAP Program, Robertson County Juvenile Court, and Family Resource Center.

### Rutherford County

The Rutherford AJC did not meet Q1 enrollment goals due to a reduction in staffing levels and a delay in hiring the external Career Advisor that was onboarded in March. Upon the transition, the caseload that four incumbent Career Advisors were handling was reduced to one. To successfully catch up on the missed Q1 goals and execute Q2 at its full capacity, the proposed action plan is as follows:

#### Enrollment Goal:

- ADW - 58 Enrollments
  - Achieve at a pace of 20/month.
- Youth – 30 Enrollments
  - 10/month with a minimum of 3/week

Target Partners: Murfreesboro Housing Authority, Families First, RESEA, CSPED, NCOA, Vocational Rehab, TAA, SNAP E&T, ETPL Training Providers, TNPTI, Allied Health, United, Dental Staff School of TN, Omni Murfreesboro, Pregnancy Resource Centers, and local high schools.

### Williamson County

#### Enrollment Goal:

- ADW - 22 Enrollments
  - Achieve enrollments at a pace of 8/month.
- Youth – 5 enrollments

Target Partners: Franklin Housing Authority, Stacy Radley at Snap E&T, Pregnancy Resource Center, Probation and Parole, Williamson County, Training Providers Truck Driver Institute, Dental Staff School of Franklin, TCAT Practical Nursing Program, Franklin, Adult Ed HISET program, Williamson County Schools.

### Sumner County

#### Enrollment Goal:

- ADW - 49 Enrollments
  - Achieve enrollments at a pace of 17/month.
- Youth – 10 enrollments

Target Partners: Vol-State orientations, TCAT Hartsville, Union University orientations, Shalom Zone, Recovery Community, Recovery Courts, VIP Kids, DHS, churches, libraries, shelters, Cumberland Cross Center Program, Local Vocational Rehab, Amazing Grace mission, Centerstone, Family Resource Center, Hope Center, Salvation Army, TN Prison Outreach, United Way, local chamber meetings, Sumner County Collaborative, and local high schools.

## **Placement Rates and Exits**

During the month of March our strategy to reduce the caseloads and increase placements was to offer overtime to the team to conduct outreach and capture placements. We also utilized external EDSI team members to assist with outreach in the centers with the largest caseloads. As a result, we have entered 61 placements to date and continue to see an uptick in positive exits (50). This external support strategy will be ongoing until we achieve a significant reduction in cases.

Additionally, our Business Services Team is actively engaging with employers to increase the number of job opportunities available for direct placements. Outreach goals have been set for each Business Services Rep to ensure the team's success in developing enough opportunities to account for a goal of 50% direct placements during Q2 – Q6.

Below are the goals that have set for each Business Services Representative:

- 300 Employer outreach calls per quarter
- 150 Job orders per quarter
- 3 OJT placements per quarter
- 3 Paid Work Experience Internship per quarter
- Hiring Events: 1 per week and 1 Multi-Employer / Industry Specific per quarter

## **Participant Expenditures**

Participant Expenditures were below the required goal of 50% for the month of January and February and while submissions for ITA's and Supportive Services ramped up in March we still fell short of the goal due to the delay in processing. As we trained up the field staff and Quality Control Coordinators on the submission process, we were unable to enter payments through VOS without the assistance of our Project Accountant who was onboarded late in quarter. Once this position was filled, we were quickly able to train and get the process moving quickly. We have since established a streamline process to ensure that all fundable activities are processed in a timely manner.

On our March invoice we ended the month at 16% for Adults, 30% for Dislocated Workers and 10% for Youth. Our strategy to increase participant expenditures in Q2 will include the following:

- Providing Supportive Services to newly enrolled participants in Davidson County which has highest number of enrollments and lowest number of support requests for Q1.
- Paid Work Experience for Youth participants
- Execution of OJT Contracts for participant placements
- Tech and Healthcare Bootcamps

We are currently working with Persevere to develop a 12-week bootcamp that will equip Youth participants with the skills needed to obtain certification and employment in Front End Web

Development. Our plan would be to pilot the Youth Bootcamp in Rutherford County and leverage the networks of our community partners for advertisement and recruitment.

We are also exploring the development of a career exploration boot camp to prepare participants for training in Healthcare.

Below are our current leads and contracts that we have executed for OJT and Paid Work Experience. The BSR team will utilize the contact reports to identify participants by the desired occupation who would be a good match for current opportunities. They will also work closely with Career advisors and Youth Advocates to identify participants during the enrollment process.

OJT Contracts to-date:

- The ICEE Company
  - (5 positions) Route Sales Driver, Billing Clerk, Customer Service Representative, Project Scheduler, and Dispatcher
- Include Me Advocacy Group
  - (4 positions) Skills Coach and Onsite Coordinator
- OJT Pending Contracts: (Waiting on Employer Signature)
  - Nashville General Hospital
  - Chartwell Hospitality

Paid Work Experience Placements to-date

- 1 Youth participant for Humphreys Co.
- 1 Youth participant for Cheatham Co.
- 1 Youth participant for Montgomery Co.

Paid Work Experience Employer Work Sites:

- Old Men Lead, LLC- Stewart County
- American Job Centers- NM 13 Counties
- Compassion Church-Dickson, Humphreys

## **Performance Improvement Strategy**

In today's nontraditional employment market, every enrollment counts. It takes a unique set of skills to effectively enroll busy applicants who have multiple responsibilities outside of the training classroom. To be effective, our enrollment team must truly understand the needs of nontraditional learners and build relationships that allow for genuine engagement. To do this well, we must train and coach staff to consistently practice a proactive recruiting process that focuses on building trust, asking the right questions, and using the knowledge learned to move prospects forward. But it is not just about the activities. The team action plans put a great deal of focus on data and evidence. In other words, it is not enough to simply hold new recruiting events or pursue new retention strategies.

### Data & Evidence Strategy

- **Improving internal systems.** Tracking enrollment progress and completion can be a complex, confusing job that involves multiple departments and systems. By creating a formal self-monitoring process, staff will be better able to monitor their progress and identify barriers before they arise.
- **Outreach to local organizations.** Seek to develop new relationships and recruiting pathways with local programs with communication tracking.
- **Persistent follow-up with participants.** This includes both follow-up after recruiting events to get a client employed and could also include "intrusive advising" strategies that regularly check in with participants once they are enrolled. For example, one opportunity could be to launch a lunch series that connects participants with employers for career advising and program counseling. Many studies show that these kinds of personal connections between the provider and the participant improve employment success. Participants need to feel that they are more than just a statistic or a name on an application.
- **Redesigning marketing material to show value.** This includes updating print materials, websites, and social media with an eye to ensure they are not aimed at just a single population. This can mean more diversity in the imagery or a change in showcasing the value proposition and services offered.
- **Using role models at recruiting & training events.** Whether it is guest speakers, business representatives, or "WIOA ambassadors," it is important that recruiting events feature people that represent the underserved population being targeted.

### Action Plan

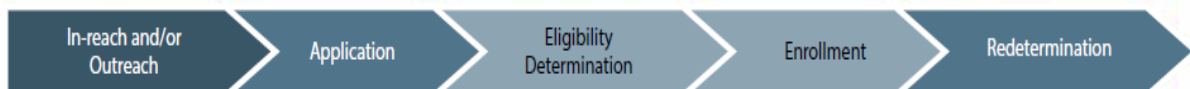
This action plan highlights innovative and tangible strategies for outreach and enrollment that will be executed in the following counties: Montgomery, Robertson, Rutherford, Sumner, and Williamson. Strategies are outlined by Levels 1-3 (L1 - immediately deploy and L3 - innovation and future initiatives).

#### Level 1

- Partnering with service providers, county-based organizations, and advocacy groups. Advocacy groups play a key role in reaching the targeted population due to their established relationships with users who might not otherwise be exposed to the program. (*Refer to Enrollments Section above for a detailed list of organizations*)
- Identify and connect with other public programs that service low-income populations to enroll eligible individuals that already use services in the county system.
- Leverage team members who already have informal connections within the community to establish and grow organizational partnerships.
  - In addition to this, reaching out to participants that have exited the program who are already connected to relevant organizations can increase the opportunity for OJT, PWE and placements.

## Level 2

- Move individuals from eligible to enrolled through in-reach and outreach efforts quickly. In-reach refers to activities administered by the AJC staff to identify, engage, and enroll an eligible individual within its existing system (*IE: to invite an existing population who have already had a touchpoint with staff*). Outreach refers to those same activities but is aimed at individuals outside the AJC's system (*IE: to invite those who do not use or who underuse WIOA services*). These approaches may influence people to increase their use of WIOA services, helping to increase other program KPI's such as Supportive Services, OJT, PWE, etc.



## Level 3

- Mailing of notifications and prepopulated applications to redetermine enrollees.
- Utilizing new technology systems to help identify eligible individuals in other public programs by targeting existing low-income populations that already use services in the county system (*IE: Adoption and Foster Care Analysis Reporting System (AFCARS), TFACTS (Tennessee Family and Child Tracking System)*)
- Forming partnerships with third-party organizations—businesses, nonprofits, government agencies, hospitals, and more—and offering programs tailored *specifically* for them (*IE: EHR Coding Certification*).
- Establish an ROI strategy for employers. We will position our program to address specific organizational and workforce development needs and be able to explain why a digital marketing certificate will offer employees skills that specifically address employer's workforce needs and problems. A return on training as a benefit is important to employers. Especially in the case when employers align their employee benefits with education tuition assistance programs, it becomes an ROI perspective. Companies and employers want a strong return on educational investment. When companies support and/or pay for 'X' degree, it is important to correlate it to 'Y' dollars saved, some definite type of employee retention improvement, or other important value for the company.

## **Training & Team Morale**

In addition to increased outreach and marketing, we will also conduct refresher trainings to ensure that each team member is well versed in all aspects of the WIOA policies and common measures, as well as the case management best practices that imperative for success in the program.

We recognize the importance of ensuring that the team is well trained and in a healthy state of mind to perform their assigned duties. In partnership with Human Resources and our Talent Team, we will conduct quarterly professional development trainings and team-building activities to increase morale and retention.

EDSI also offers a free employee assistance program that is available 24-7 to team members and their family that may be dealing with stress. As COVID-19 continues to impact our team in Tennessee, it is our goal to ensure their health and safety are a top priority.

Below is a list of the trainings that will be facilitated during Q2:

- WIOA and Northern Middle Tennessee Policy Review
- Case Management (Refresher)
- Case Notes – 3 Modules (Refresher)
- VOS Training (Alerts, Reports, and Eligibility)
- Title VI Civil Rights
- Skilldex Assessments for OJTs
- Recruitment – Prescreening for Employers
- How to Have Difficult Conversations
- De-escalation and Conflict Resolution

*Danielle Ellis*

**EDSI** | Regional Director

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### **Enrollment**

MAC understands that our Key Performance Indicators around new enrollments require that we enroll both in and out of school quarterly. To establish viable and ongoing referral links, we have made the following internal and external connections in the last four months. We will continue to nurture these connections to increase enrollment numbers.

#### **Internal MAC Referral Resources:**

- We are in the process of reaching out to the recipients of utility and rent assistance through MAC who are also between the ages of 17-24 and who are single parents to invite them to orientations and enrollments being held on Tuesdays and Thursdays at the AJC
- All Head Start parents between the ages of 17-24 have received a letter about the WIOA program and its eligibility, inviting them to self-refer
- We have presented to the MAC HiSet team regarding WIOA eligibility and the referral process; we have also presented at the regularly scheduled HiSet participant meeting regarding WIOA
- We are partnering with other MAC programs to participate in recruitment events for all MAC services, including a resource fair at John Henry Hale Public Housing on April 14<sup>th</sup> (EDSI is also invited to attend this event)
- All Opportunity NOW youth employment program applicants have received information regarding WIOA

#### **AJC Referral Resources:**

- AJC staff introduce all walk-ins under age 25 immediately to the Youth team
- We are partnering with EDSI to share information about the Youth program at orientation on Wednesdays and Fridays
- We have reached out to the Workforce Essentials Adult Education Director regarding referrals from and to that program

#### **Community-based Referral Sources with Whom We Have Already Met:**

- Martha O'Bryan Center's Reengagement Hub, which works to connect young people out of work and out of school from the East Nashville community with employment and education
- Martha O'Bryan Center's HiSet program, which is community-based targeting East Nashville and not funded through Adult Education dollars
- Martha O'Bryan Center's Academic Student Unions, after school academic and graduation support in three different Metro School (Stratford, Maplewood, and Hunters Lane)
- Monroe Harding's Reengagement Hub, which works to connect young people out of work and out of school from the North Nashville community with employment and education
- Monroe Harding's Education Services, which includes HiSet and online High School courses targeted to young adults. Also not funded through Adult Education dollars
- Monroe Harding's Independent Living Services, which includes several independent living homes for young adults who have aged out of foster care or who are have been victims of crime

- Monroe Harding's Works Wonders Program, an evidence-based work-readiness program for young adults disconnected from employment or chronically under-employed
- Oasis Center's Rapid Rehousing Services coordinated entry for youth who are experiencing homelessness
- Crossroads Campus coordinated employment, training, and independent living for young adults facing adversity
- Goodwill of Middle Tennessee
- Davidson County Juvenile Court and the Davidson County Juvenile Court Clerk
- Courtney Matthews and the Department of Children's Services Office of Independent Living
- Christina Scott with Youth Villages Independent Living
- Deanna Starnes with the Culinary Apprenticeship at Nashville State Community College
- Next Steps and Vanderbilt's Peabody College

**Metro Nashville Public Schools-based Referral Resources with Whom We Have Already Met:**

- The Simon Foundation Schools, including the Academy at Old Cockrill, the Academy at Opry Mills, and the Academy at Hickory Hollow, Metro Public Schools focusing on accelerated graduation and credit recovery for youth over age 18
- Keri Randolph, MNPS' Executive Officer of Strategic Federal, State, and Philanthropic Investments
- Megan Cusson-Lark, MNPS' Executive Director of School Counseling
- Office of the Academies of Nashville (Davidson County's CTE structure)
- Catherine Knowles, the McKinney-Vento program coordinator

### **In-School Expenses**

Per State policy, 40% of funds must be spent on In-School Youth (ISY). These expenses include both staff and internal expenses as well as Participant Costs associated with ISY. Per our contact list above, we are actively working on recruiting ISY. However, our initial planned staffing pattern for the grant was to have 1.5 FTEs working with ISY, dedicating one staff person only to ISY and 50% of another person's caseload. However, because the caseload we inherited from Mid-Cumberland Workforce Services included only 1 ISY, we have been unable to meet this salary breakout for the first three months of the contract period. As a result, this expenditure gap is wider than the recruitment picture alone indicates.

Therefore, we are seeking to maximize expenditures on this population for this quarter. We are prioritizing ISY for work experience as well as targeting young people preparing to graduate from high school in May and June for incentives.

### **Work Experience Expenses**

Per the WIOA Legislation, at least 20% of funds must be spent on work experience. Our contract stipulates that 25% of total expenses should be for work experience.

To meet that goal, we currently have two young people who are finishing up work experience in April and plan to employ 6 new young people this month. In May, we will expand that number to 16, and increase to 30 working in June. Our budget calls for approximately \$45,000 worth of work experience

expenses every six months. With an average monthly wage for work experience of \$900, these targets would let us reach approximately \$45,000 of new work experience direct participant expenses by the end of June.

In addition to participant wages, staff will continue to track their time spent supporting work experience development and implementation per the guidance received.

### **Minimum Participant Cost Rate**

Per State policy, 40% of expenses should be spent directly on participants through supportive services, training costs, incentives, and work experience wages and benefits. These costs are designated as Participant Costs. Our contract stipulates that 50% of total expenses should be directed towards these Participant Costs. For the six-month period between January and June, we should expect to expend \$135,000 on Participant Costs.

- We anticipate spending \$45,000 on work experience wages and benefits
- We are targeting high school students for ISY recruitment and expect to spend \$10,000 on incentives for high school graduation, hiset, and training completion, in addition to other, smaller incentive payments for documented progress meeting the policy guidelines
- Ideally, we would be spending \$45,000 on supportive services during this period. However, many of the expenditures we would otherwise have had on things like rent and utilities are currently being picked up by CARES Act and other COVID relief programs. We are actively seeking to support our clients, both active and those newly in follow-up, but these expenses may not be as high as the original target because of other available resources.
- We anticipate spending \$30,000 during the period on ITAs. We currently have three people beginning the training process who should be billed in April and anticipate serving an additional six people through training through May and June.

**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**MARCH 2020 FISCAL UPDATE**  
**NORTHERN MIDDLE GRANT UTILIZATION**

*\*Northern Middle's fiscal year-to-date grant utilization for ALL activities (to include Campbell Strong, a National Dislocated Worker grant and COVID-related CARES grants) has been noteworthy among Tennessee LWDA's at \$9.8M.*

Northern Middle LWDA	QTR 1	QTR 2	QTR 3	FY Expenses July thru Mar 2021
All Northern Middle Expenditures	3,442,786	3,970,364	2,411,782	\$ 9,824,932

*\* Northern Middle's Qtr 3 grant expenditures decreased by \$1.6M compared to Qtr 2 (which included CARES activity), and decreased \$1M compared to Qtr 1 of FY 2020-21.*

*\*The \$1.6M decrease relates to:*

- \* \$1M decrease in Adult, Dislocated Worker and Youth expenditures impacted by Career Service Provider transitioning.*
- \* \$600k decrease in CARES activity which ended the prior quarter.*

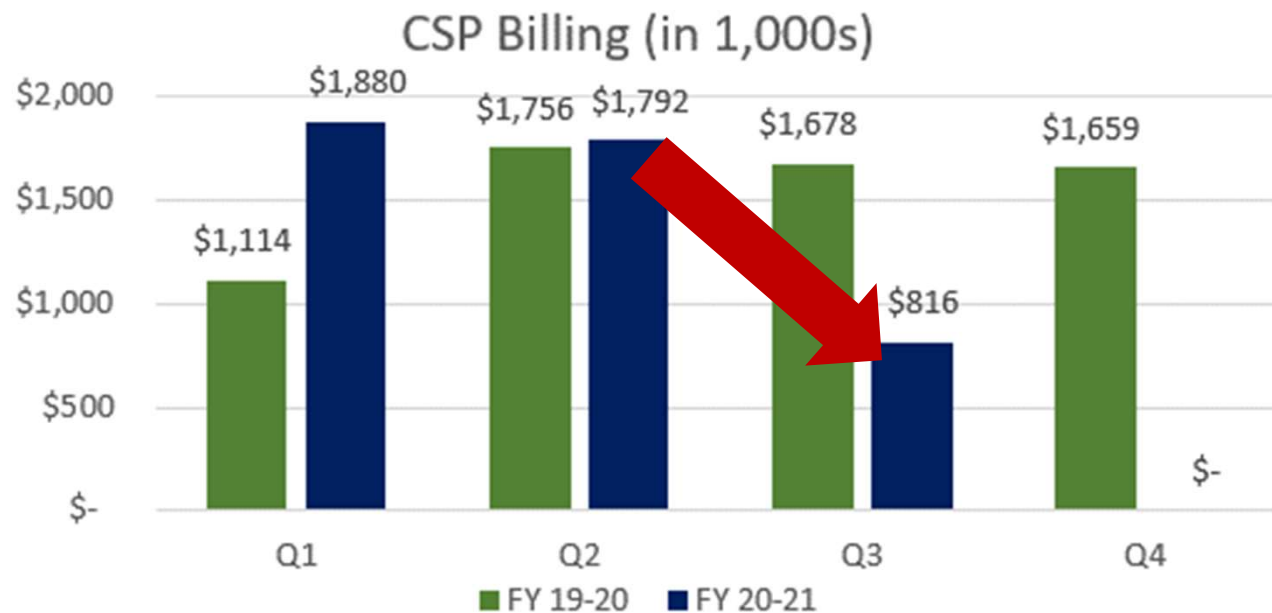
**NORTHERN  
MIDDLE TN  
WORKFORCE  
BOARD  
MARCH 2021  
FISCAL  
UPDATE**

**BUDGET TO  
SPEND  
PROGRESSION**

	(in 000's)					
	2020 QTR 1	2020 QTR 2	2020 QTR 3	Expenses YTD	12 Mo. Budget	% Spent
<b>Northern Middle LWDA</b>						
IFA	188	195	247	630	1,000	63.0%
Adult	820	848	477	2,145	3,057	70.2%
Dislocated Worker (\$300,000 for Adult *)	747	642	375	1,764	4,736	37.2%
Youth	672	658	321	1,650	2,802	58.9%
RESEA	20	35	16	71	126	56.6%
Campbell Strong	849	730	724	2,303	3,344	68.9%
National Dislocated Worker - 1	318	447	218	983	983	100.0%
Other State Initiatives (RD, CE, WB)	0	0	0	0	121	0.0%
<b>Total FY 20-21 Base Budget AUG/NOV Meeting</b>	<b>3,426</b>	<b>3,360</b>	<b>2,131</b>	<b>8,917</b>	<b>15,170</b>	<b>58.8%</b>
National Dislocated Worker - 1 Modification			132	132	165	80.3%
National Dislocated Worker - 2 Expires 6/2022			104	104	1,693	6.2%
Apprenticeship Grant	16	19	1	36	36	100.0%
CARES Consolidated Business Grant	0	352	16	367	370	99.3%
CARES Re-Employment Grant	0	239	7	247	249	99.1%
<b>FY 20-21 Budget Modified FEB Meeting</b>	<b>3,443</b>	<b>3,970</b>	<b>2,391</b>	<b>9,804</b>	<b>17,683</b>	<b>55.4%</b>
Statewide Administration - Regional Study			21	21	21	100.0%
RESEA Increase			0	0	42	0.0%
CARES Statewide Training			0	0	377	0.0%
<b>Total FY 20-21 Expenditures vs Budget MAY Meeting</b>	<b>3,443</b>	<b>3,970</b>	<b>2,412</b>	<b>9,825</b>	<b>18,123</b>	<b>54.2%</b>
<b>Funding Increase - Budget Action Item</b>					<b>440</b>	
<b>* Re-purposed \$300,000 of Dislocated Worker funding to Adult</b>						

**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**MARCH 2021 FISCAL UPDATE**  
**CONTRACTOR BILLING TREND**

*Transitioning contractors were underspent in their initial quarter. Contractor billing at 816k was only 49% compared to \$1.7M in Quarter 3 of last year; and 46% of last quarter's \$1.8M.*



**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**MARCH 2021 FISCAL UPDATE**  
**CONTRACTOR BILLING PROGRESSION**

*With 17% of time elapsed in the contract period, EDSI spent 7% and MAC spent 5% of their respective contract budgets. Expenditures are slowly ramping up for each contractor.*

	In \$000's					
Career Service Provider Billing	Jan-21	Feb-21	Mar-21	Total Budget Spent	Total 18 Month Budget	% Spent - 17% time elapsed
EDSI - Incoming	\$ 187	\$ 204	\$ 235	\$ 626	\$ 8,370	7%
MAC - Incoming	\$ -	\$ 11	\$ 32	\$ 43	\$ 800	5%
MCHRA Outgoing	\$ 147			\$ 147		
Total Exp Q3 2020-21	\$ 334	\$ 215	\$ 267	\$ 816		

# NORTHERN MIDDLE TN WORKFORCE BOARD

## MARCH 2021 FISCAL UPDATE

### CONTRACTOR PERFORMANCE

*Quarter 3 contractor activity fell short of performance goals in all fund streams. Youth measures are significantly behind targets.*

#### Educational Data Systems, Inc. (EDSI)

EDSI	MPCR - Goal 50%			Work Exp - Goal 25%	ISY/Youth - Goal 40%
	Adult	DW	Youth	Youth	Youth
<b>CTD CUMULATIVE</b>	<b>12%</b>	<b>23%</b>	<b>14%</b>	<b>0%</b>	<b>1%</b>
January 2021	0%	0%	17%	0%	0%
February 2021	16%	35%	16%	0%	0%
March 2021	18%	29%	11%	0%	1%

#### Metro Action Commission (MAC) Davidson - Youth

MAC	MPCR - Goal 50%	Work Exp - Goal 25%	ISY/Youth - Goal 40%
	Youth	Youth	Youth
<b>CTD CUMULATIVE</b>	<b>17%</b>	<b>9%</b>	<b>4%</b>
January 2021	100%	85%	0%
February 2021	19%	17%	1%
March 2021	15%	6%	6%

# NORTHERN MIDDLE TN WORKFORCE BOARD

## MARCH 2021 FISCAL UPDATE

### MINIMUM PARTICIPANT COST RATE (MPCR)

**TDLWD Minimum Participant Cost Rate (MPCR) - Preliminary Through March 2021**

Without  
Campbell Strong  
or Disaster  
Relief Grants

# MPCR = 39.97%

MPCR dropped 4.9  
percentage points

	Service Provider Youth	Provider Adult & Dislocated Worker	Campbell Strong excluded	Disaster Relief	CARES, Apprentice, Incumb Wkr	Other (NM & IFA)	Total
Qualifying Expense	\$ 617,333	\$ 1,431,007				\$ 5,326	\$ 2,053,665
Total Program	\$ 1,360,524	\$ 3,054,622				\$ 723,161	\$ 5,138,307
MPCR	45.37%	46.85%	-	-		0.74%	39.97%

Northern Middle dropped **below** the 40% Requirement in Quarter 3.

**\*\*\* PRIOR QUARTER MPCR = 44.87% \*\*\***

**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**MARCH 2021 FISCAL UPDATE**  
**MINIMUM PARTICIPANT COST RATE (MPCR)**

**Participant Cost Rate - Through March 2021**

Including  
Campbell Strong  
and Disaster  
Relief Grants

**MPCR = 56.90%**

Drop of 2.48 percentage  
points

	Service Provider Youth	Service Provider Adult &	Campbell Strong	Disaster Relief	CARES, Apprentice, Incumb Wkr	Other (NM & IFA)	Total
Qualifying Expense	\$ 617,333	\$ 1,431,007	\$ 1,326,448	\$ 1,073,717	\$ 724,539	\$ 5,326	\$ 5,178,369
Total Program	\$ 1,360,524	\$ 3,054,622	\$ 2,115,106	\$ 1,121,395	\$ 725,681	\$ 723,161	\$ 9,100,490
MPCR	45.37%	46.85%	62.71%	95.75%	99.84%	0.74%	56.90%

\*\*\* PRIOR QUARTER = 59.38% \*\*\*

**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**MARCH 2021 FISCAL UPDATE**

**EXECUTIVE SUMMARY**

**CAMPBELL STRONG 3-YEAR PROJECT RECAP**  
*(1-year, no-cost extension to 9/30/2021 granted)*

<b>Campbell Strong Project</b>	<b>Expenses</b>	<b>Budget</b>	
Campbell Strong - Current fiscal year	2,303,133	3,343,629	68.9%
Campbell Strong Expenditures - Project-to-Date	6,709,552	\$ 7,750,048	86.6%

<b>Direct Participant Expenses</b>	<b>Expenses</b>	<b>Budget</b>	
Campbell Strong - Current fiscal year	1,326,448	1,685,331	78.7%
Campbell Strong Expenditures - Project-to-Date	3,641,117	4,000,000	91.0%

<b>Campbell Strong Enrollments</b>	<b>Actual</b>	<b>Goal</b>	
Participant Enrollments	1,620	2,000	81.0%

# **NORTHERN MIDDLE TN WORKFORCE BOARD**

## **MARCH 2021 FISCAL UPDATE**

### **MONITORING UPDATE**

#### **EDSI and MAC – Incoming Career Service Providers**

- **Weekly contractor meetings; Staffing updates; Strategies in timely performance improvements.**
- **Expectations communicated; Dashboards discussed; Timelines for corrective action requested.**
- **Monthly invoice desk reviews with feedback; Corrective action responses obtained.**
- **Monitoring focus: CSP staffing, training for service delivery, performance objectives, eligibility, ETPL, invoicing and systems reconciliations.**

#### **Mid Cumberland HRA**

- **Outgoing Career Service Provider – Transitional issues including disallowed costs have been communicated with expected action. Adjustments are ongoing.**
- **Continuing One-Stop Operator – Northern Middle implemented a One-Stop Operator monitoring tool and MCHRA has provided responses requested.**

#### **Campbell Strong – Workforce Essentials/West KY Workforce Board**

- **Low total expenditures resulted in remaining funds at the end of the two year contract period. A twelve month no-cost extension with increased enrollment goals was granted.**
- **Northern Middle requested State technical assistance regarding completion of the project and continued funding.**

**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**MARCH 2021 FISCAL UPDATE**  
**2021-22 INITIAL BUDGET REVENUES**

Grant Revenue	\$ in millions	\$
Carryover from 20-21	4.7	4,749,615.89
New Allocations	8.6	8,549,962.82
Total Adult, DW, Youth	13.3	13,299,578.71
Youth grant not available until 22-23	(2.9)	(2,917,504.56)
Carryover to 22-23 at 20% of Adult, DW	(1.1)	(1,126,491.65)
Total 21-22 Adult, DW, Youth	9.3	9,255,582.5
Campbell Strong	0.3	332,447.68
National Emergency DW	1.1	1,190,502.47
Rural Development	0.1	52,193.44
RESEA	0.1	100,000.00 *
IFA	1.0	1,000,000.00
Total 21-22 Projected Grant Revenue	11.9	11,930,726.08

\* Pending 21-22 RESEA award

**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**MARCH 2021 FISCAL UPDATE**  
**2021-22 INITIAL BUDGET EXPENSES**

Projected Expenses	\$ in millions	%	
NM Workforce Board (Admin & Program)	1.3	11%	1,265,645.00
Board Incumbent Worker Program	0.3	3%	300,000.00
IFA (non-Title I)	1.0	8%	1,000,000.00
Total Board and Overhead	2.6	22%	2,565,645.00
Campbell Strong Workforce Partnership	0.3	3%	332,447.68
National Emergency DW	1.1	9%	1,190,502.47
OSO	0.3	3%	301,399.88
CSP	7.4	62%	7,388,537.61
Rural Development	0.1	0%	52,193.44
RESEA	0.1	1%	100,000.00 *
Total Contracted Grant Services	9.3	78%	9,365,081.08
Total 21-22 Grant Expense	11.9	100%	11,930,726.08

\* Pending 21-22 RESEA award

**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**MARCH 2021 FISCAL UPDATE**  
**ACTION**

- \* 2020-21 Financial Report and Budget Revision (+ \$440k) Approval
  - \* 2021-22 Budget Approval (\$11.9M)

# Northern Middle Tennessee Workforce Development Board

## AJC Report

For January 1 to March 31, 2021

Report Date: May 12, 2021

### Local Area Updates

Last fall, the Northern Middle Tennessee Workforce Development Board awarded three contracts. On January 1, those contracts went into effect. Mid-Cumberland retained the One-Stop Operator contract, while Metro Action Commission (MAC) is now providing Youth Services in Davidson County, only. EDSI Solutions is providing Title I Youth Services in twelve of our thirteen counties (except Davidson) and Title I Adult & Dislocated Services in all thirteen counties in our local area.

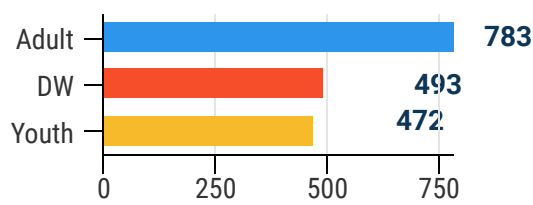
EDSI has a unique model that provides a Business Services Team working directly with employers, in addition to the traditional Career Advisors who work directly with job-seekers. This model provides a direct employment link between the AJC and the employer

The Premier Virtual Job Fair Platform has been a useful tool during the pandemic, and will continue to be. With the increase in vaccinations and the overall decrease in COVID numbers, our AJCs are now hosting small live and in-person job fairs. We are allowing single employers back into the AJCs to schedule one-on-one appointments with potential candidates. They are also getting very creative with offsite drive-through job fairs held in conjunction with local churches to utilize their expansive parking lots during the week.



### Partner Program Updates

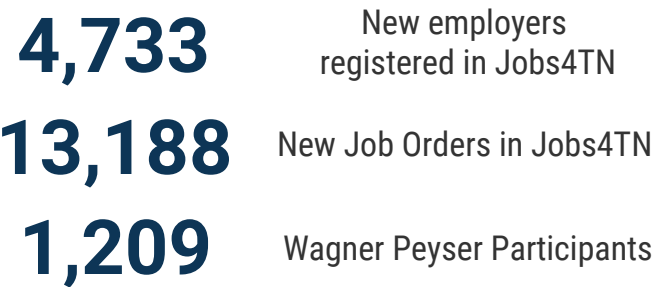
#### Title I Active Cases



#### Adult Education

A total of **83** students received their HiSETs with an average of **456** students enrolled in classes! This quarter, **81** students received a level gain.

### Wagner Peyser

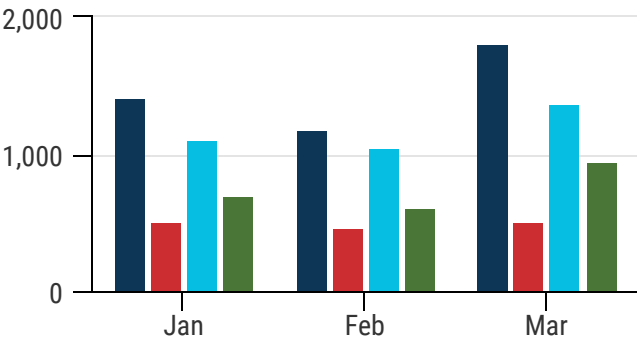


### Vocational Rehabilitation



### AJC Total Traffic Counts

#### Comprehensives

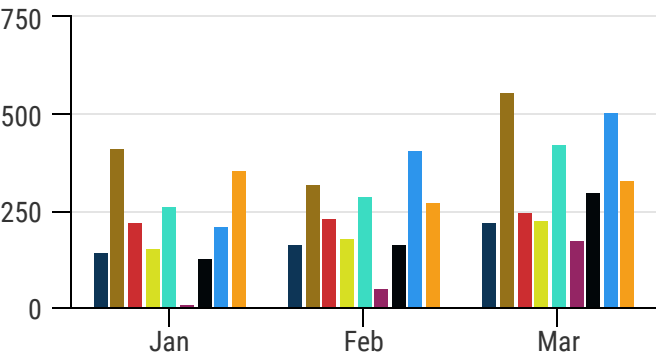


Navy - Davidson  
Red - Montgomery  
Med. Blue - Rutherford  
Green - Sumner

#### Total Individual Visitors

19,140

#### Affiliates



Navy - Cheatham  
Gold - Dickson  
Red - Houston  
Yellow - Humphreys  
Teal - Robertson  
Purple - Stewart  
Black - Trousdale  
Med. Blue - Williamson  
Orange - Wilson

# Northern Middle AJC Report

## March 31, 2021

Unemployment Rates by County as of March 31, 2021;    NM = 4.3%    State = 5.1%

County	Unemployment Rate (Mar 31)	Unemployment Rate (Dec 31)
Cheatham	4.1%	3.8%
Davidson	4.5%	4.7%
Dickson	4.3%	3.8%
Houston	7.1%	6.2%
Humphreys	4.8%	4.4%
Montgomery	5.7%	5.3%
Robertson	4.1%	3.9%
Rutherford	4.1%	3.9%
Stewart	5.6%	5.2%
Sumner	4.3%	4.1%
Trousdale	4.7%	4.2%
Williamson	3.3%	3.3%
Wilson	4.0%	3.8%

There has been a concerning trend in unemployment numbers over the past quarter. Eleven of our thirteen Northern Middle counties saw a rise in unemployment over the past three months, ending March 31. Unemployment remained flat in Williamson County at 3.3% compared to the quarter ending on December 31. Davidson County, usually one of our higher counties for unemployment, actually saw a drop in unemployment last quarter compared to the previous quarter – dropping from 4.7% in December to 4.5% in March. The largest single increase occurred in Houston County, which saw a jump from 6.2% to 7.1% in one quarter.

What is troubling regarding this trend is that while the unemployment rolls are growing, employers are having trouble finding workers. It seems to be a problem throughout our local area, as employers are struggling to find capable people to fill their needs.

This is an opportunity for our American Job Centers (AJCs) to serve our employers and get creative to help match them up with capable employees that want to work. Several of our AJCs have hosted Drive-Thru job-fairs at nearby offsite locations – usually in a church parking lot that is large enough to handle the volume. We are welcoming more employers into our AJCs for smaller hiring events, while still observing local and CDC guidelines.

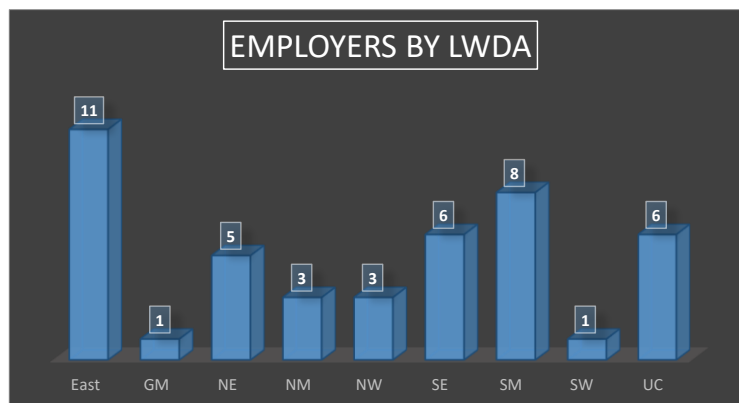
Of course, we are still hosting many virtual job-fairs through our Premier Virtual Job-Fair Platform, which has been very popular among job-seekers, as well as employers.

### Key Performance Indicators (KPI)

For 2021, the state is transitioning to hard targets for our Northern Middle Key Performance Indicators (KPIs). This will align the goals align the goals with the program year (July-June), rather than the calendar year. Our KPIs involve all partners within the American Job Centers (AJCs). The KPIs quantify and track our implementation of all aspects of the Workforce Innovation and Opportunity Act (WIOA).

### CARES ACT-Phillips Haas Tracking

	Company	Location	Local Area	Number	Start Date	End Date	Amount
1	Advanced Tool & Machine	Morristown	E	1	5/3/2021	5/7/2021	\$ 3,495.00
2	CoorsTek	Oak Ridge	E	2	5/3/2021	5/21/2021	\$ 6,990.00
3	IBM	Knoxville	E	1	4/12/2021	4/16/2021	\$ 3,495.00
4	JDS Technologies	Oneida	E	1	4/12/2021	4/16/2021	\$ 3,495.00
5	Lockar Inc.	Knoxville	E	2	4/19/2021	4/23/2021	\$ 6,990.00
6	Standard Aero	Maryville	E	2	5/24/2021	5/28/2021	\$ 6,990.00
7	Sweetwater Machine	Sweetwater	E	1	5/3/2021	5/7/2021	\$ 3,495.00
8	TGS Precision	Lenoir City	E	2	4/26/2021	4/30/2021	\$ 6,990.00
9	Tri-Went	Knoxville	E	1	4/19/2021	4/23/2021	\$ 3,495.00
10	Machined Products	Knoxville	E	1	5/24/2021	5/28/2021	\$ 3,495.00
11	Chambers American Products	Pioneer	E	2	5/10/2021	5/14/2021	\$ 6,990.00
12	Assa Abloy	Memphis	GM	2	5/10/2021	5/28/2021	\$ 6,990.00
13	A.Y.M.	Elizabethton	NE	3	4/19/2021	4/23/2021	\$ 10,485.00
14	Alemite	Johnson City	NE	2	5/17/2021	5/21/2021	\$ 6,990.00
15	Delfasco	Afton	NE	5	4/12/2021	5/28/2021	\$ 17,475.00
16	RPM Machining	Rogersville	NE	1	5/24/2021	5/28/2021	\$ 3,495.00
17	Universal Machine & Tool	Kingsport	NE	2	5/3/2021	5/28/2021	\$ 6,990.00
18	Barrett Firearms	Murfreesboro	NM	1	4/26/2021	4/30/2021	\$ 3,495.00
19	Gibson Brands	Nashville	NM	1	4/26/2021	4/30/2021	\$ 3,495.00
20	Peterson Tool	Nashville	NM	2	4/12/2021	4/16/2021	\$ 6,990.00
21	Dienamic Tool	Milan	NW	1	5/17/2021	5/21/2021	\$ 3,495.00
22	Kohler	Union City	NW	2	5/3/2021	5/7/2021	\$ 6,990.00
23	McKenzie Valve & Machining	McKenzie	NW	1	4/12/2021	4/16/2021	\$ 3,495.00
24	Duracell Company	Cleveland	SE	2	5/17/2021	5/21/2021	\$ 6,990.00
25	La-Z-Boy	Dayton	SE	1	4/19/2021	4/23/2021	\$ 3,495.00
26	Miller Industries	Ooltewah	SE	2	5/17/2021	5/21/2021	\$ 6,990.00
27	Storm Power Components	Decatur	SE	2	4/19/2021	4/23/2021	\$ 6,990.00
28	TAG Manufacturing	Chattanooga	SE	2	4/19/2021	5/7/2021	\$ 6,990.00
29	Waupace Foundry, Inc.	Etowah	SE	3	5/10/2021	5/29/2021	\$ 10,485.00
30	All Tech Machinery	Winchester	SM	2	5/24/2021	5/28/2021	\$ 6,990.00
31	Atlantic Air Tool Co. Inc.	Taft	SM	1	4/12/2021	4/16/2021	\$ 3,495.00
32	Boles Tool	McMinnville	SM	1	4/12/2021	4/16/2021	\$ 3,495.00
33	Farmers Friend	Williamsport	SM	2	4/12/2021	4/16/2021	\$ 6,990.00
34	Matrix Drilling Products	Lewisburg	SM	1	5/10/2021	5/14/2021	\$ 3,495.00
35	Microcraft	Tulahoma	SM	1	5/10/2021	5/14/2021	\$ 3,495.00
36	Richland Industries	Pulaski	SM	1	5/10/2021	5/14/2021	\$ 3,495.00
37	Schmiede	Tulahoma	SM	2	5/3/2021	5/7/2021	\$ 6,990.00
38	Black and Decker	Jackson	SW	1	5/24/2021	5/28/2021	\$ 3,495.00
39	Bennett Industries	Cookeville	UC	1	5/3/2021	5/7/2021	\$ 3,495.00
40	Bouldin & Lawson	McMinnville	UC	1	5/17/2021	5/21/2021	\$ 3,495.00
41	Dunn & Bybee Tool	Sparta	UC	1	4/5/2021	4/9/2021	\$ 3,495.00
42	Taco Metals, Inc.	Sparta	UC	2	4/12/2021	4/30/2021	\$ 6,990.00
43	Transtar	Cookeville	UC	2	5/3/2021	5/28/2021	\$ 6,990.00
44	FICOSA North America	Cookeville	UC	1	5/10/2021	5/14/2021	\$ 3,495.00
				71			\$ 248,145.00





APPLICATION FOR CERTIFICATION

Date 05/06/2021

LWDA

Northern Middle TN LWDB

Type of Site

Access Point

Contact Person

Greg Gabis

Title

Workforce Dev. Coordinator

Phone

615-242-1554

Email

ggabis@cctenn.org

Site to be certified

Address

2013 25th Ave. North

City

Nashville

State

TN

Zip Code

37208

Web site

http://cctenn.org

Hours of Operation

8:00 AM - 5:00 PM

Days of Operation

Monday - Friday



**AJC ACCESS POINT:**

Accessible to the general public or targeted population that includes physical and programmatic access to individuals with disabilities

Portal site for electronic access

Established working relationship as part of an integrated system

**C.E. McGruder Family Resource Center:**

The McGruder Center focuses on specific needs of residents living in the North Nashville Area. Typical community risk factors include poverty, hunger, homelessness, abuse, neglect, poor health, evictions, mental illness, substance abuse, unemployment, and other basic needs.

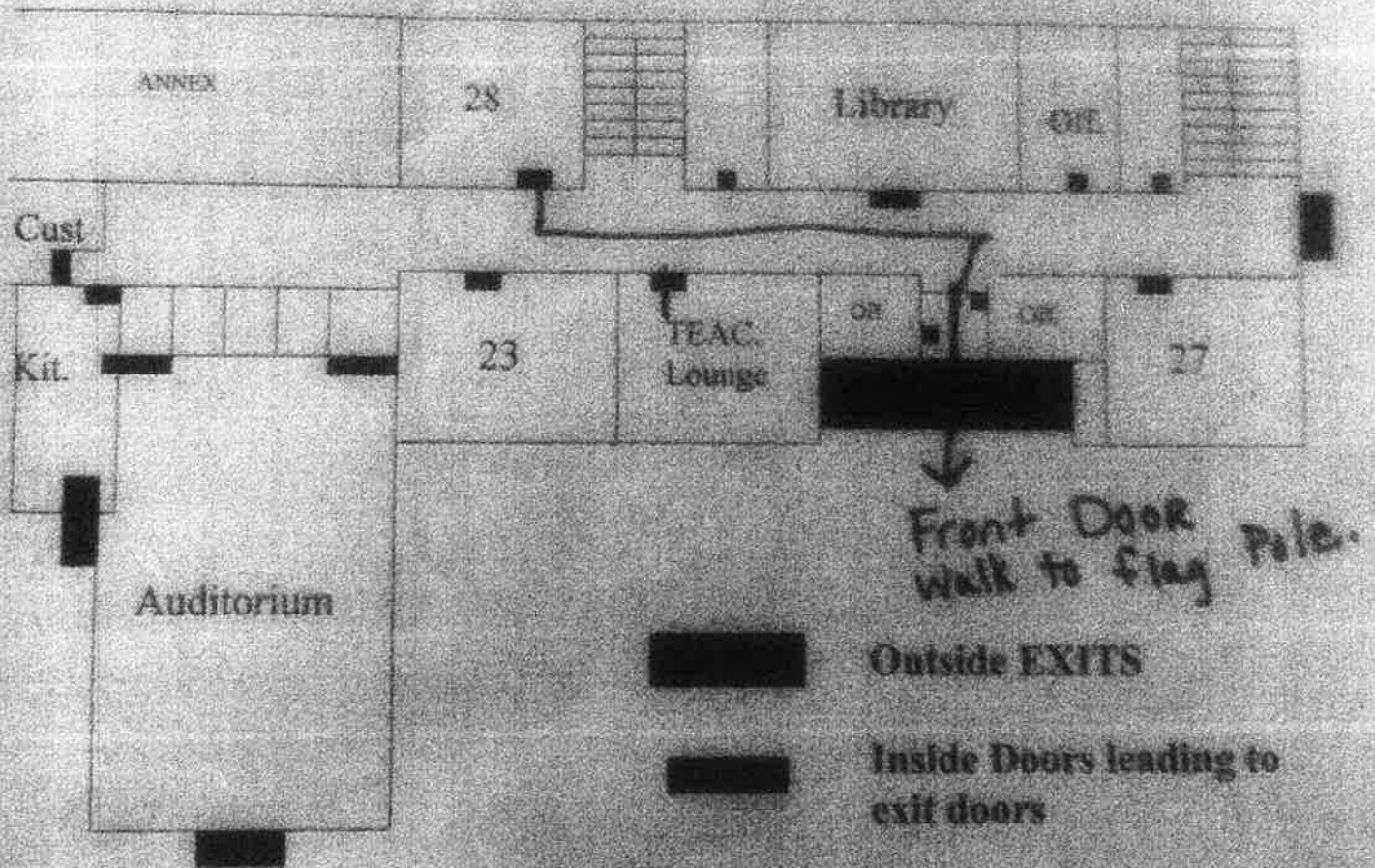
Having an American Job Center Access Point co-located within the McGruder Center would be an invaluable resource to not only the North Nashville residents that frequent the building daily, but also the Greater Metropolitan Nashville Area. As we are all aware, many Nashvillians were negatively impacted by the 202 tornado and COVID-19 pandemic and having access to relevant training and employment/career resources in the community will make a lasting impression and help those most in need. Integrating the American Job Center into the existing community hub of the McGruder Center will provide another partner resource to assist local citizens in identifying training and employment opportunities resulting in future successes.



McGruder Family Resource Center Partner List							
Partner Name	Programming Offered	Bldg. Schedule	H & HS	WFD	Youth	A & C	Civic Eng.
Preston Taylor Ministries	Afterschool tutoring & Camps	M-TH 1P-7P			x		
14th Avenue MBC	Destiniation Graduation	Virtual due to C19			x		
Studio NPL	Digital Literacy	On hold due to C19		x			
YWCA	Dress for Success	On hold due to C19		x			
Corner to Corner	The Academy	Virtual due to C19		x			
Corner to Corner	Hope Bakes	Part of Afterschool			x		
Corner to Corner	Script to Screen	Part of Afterschool			x		
Pathway Lending	Entrepreneurship Coaching	On hold due to C19		x			
Free Hearts	Education/WFD/Advocacy	On hold due to C19		x			x
Girl Scouts Troop 6000	Life Skills + Entrepreneurship	Tuesdays 6p-7p			x		
MAC	Opportunity NOW	Summer (times vary)		x	x		
National Council on Aging	Senior Employment Services	M-F 8:30-4p (shifts vary)	x	x			
Catholic Charities	Sewing Training Academy	T/TH Classes run until 4p		x			
Nashville Food Project	Community Garden + Education	Spring + Fall Growing Season	x				x
Catholic Charities	Mental Health Counseling	M-F 8:30-4p by Appt	x				
New Beginnings	Exercise, Yoga, Aerobics	On hold due to C19	x		x		
UW/DHS/Catholic Charities	Family Empowerment Program	M-F 8:30-5 (hybrid schedule)	x				
CSPED/Maximus	Fatherhood Training	Last weekend of each month Fr-Sat	x				x
Matthew Walker Comp. Health Center	Insurance Enrollment	On hold due to C19	x				
Metro Juvenile Court	Probation Case Management	Virtual due to C19			x		x
Catholic Charities	Living at Home Senior Services	Virtual due to C19	x				
Catholic Charities/ United Way	North Nashville Outreach; Financial Literacy/Utility Assistance Rental Assistance/ Emergency Food Assistance	M-TH 8:30-11:45; Appts accepted	x				
Public Defenders Office	Provide assistance to Nashville neighbors who are justice and formally justice involved		x	x			x
TN Dept of Human Services	SNAP Enrollment and services	Monday 9:00-4:00	x				
McGruder Social Practice Artist Residency	Social Practice artistry	Schedule Varies		x	x	x	x
Metro Bordeaux North Nashville Community Justice Center	Housing Court, Expungement Clinics, Voter Restoration, Educational Resources	Virtual due to C19	x		x		x
Urban Housing Solutions	Affordable Housing Solutions	Off-site location	x				x

# Conference Rm # 28

## McGruder FRC Emergency Exits



## **Catholic Charities of Tennessee, Inc.**

### **Northern Middle Workforce Board- FY21-22 Trades Training Proposal**

#### **The need- why is there a need in North Nashville to have access to training in the trades.**

North Nashville, a historically underserved African-American community, like many urban cores, is experiencing a resident migration. Many residents have lived in North Nashville for most or all of their life and are eager for opportunities to help them thrive where they are. Residents desiring to stay in their homes often need a number of supports including workforce development. The Catholic Charities Family Resource Center (FRC) at McGruder provides residents with many opportunities, but none more significant than connecting families to meaningful employment in Nashville's growing business sectors. In addition to workforce development the FRC has over twenty co-locating partners to help with basic needs case management (rent, utility, mortgage, and food assistance), housing stability, counseling, transportation, financial literacy, soft skills, resume writing, after-school programming, etc. This model of wraparound programming provides stability for many of the hurdles our clients face. The FRC is in the process of collaborating with Workforce Essentials to establish an American Jobs Center access point on-site in North Nashville.

Nashville is graced by unprecedented growth deeming it the "it city," boasting an unemployment rate significantly lower than the national average and increases in corporate relocations. This growth has not benefited all segments of our city equally. Gentrification moved through easily accessible parts of the community causing displacement, thus removing vulnerable residents from the urban job core. Federally designated Promise Zone 5, which is a historically African American district in North Nashville, is in the epicenter of this economic tug-and-pull. However, the FRC works with many adults and young adults in the community that are hopeful that they can pursue their life goals while living in North Nashville. Two workforce development pathways, culinary training and sewing training, are already in place and being utilized at the FRC. Multiple onsite partners provide entrepreneurial training which has helped business-minded clients start their own local catering and alteration services. Despite the rich culture and history of this community, there are challenges. The overall population continues to lack the discretionary income to attract desired retail and restaurants. Per capita income is below the county average at \$15,859 (American Community Survey, 2011-2015), and according to a Brookings Institute report from 2018, 14 percent of people who grew up in the 37208 zip code between 1980-1986 have been incarcerated (three points higher than the next highest nationally ranked neighborhood).

The FRC provides resident-driven and industry-informed workforce development programs for low-income North Nashville residents seeking upward mobility. By co-locating the significant resources that exist here, residents will be better able to access the tools to overcome the complex challenges that prevent them from achieving economic success. The approach is to meet clients where they are, both figuratively and literally. Services are located in the community to help minimize, if not eliminate, transportation barriers. Co-locating services in one location helps

to address multiple needs of individuals and family members. Onsite there is programming for the arts, an auditorium where residents host performances of plays they created, a safe place for the neighborhood to play basketball and soccer, and a vibrant community garden. The FRC has been assisting North Nashville since 2003 while Catholic Charities (founded in 1962) has had a presence in the immediate community for over 30 years.

### **The Need for Skilled Trades**

According to the In Demand Occupations to 2026 report by the State of Tennessee, skilled trades are in high demand in Nashville. The data shows that trades such as heating, air conditioning, and refrigeration mechanics and installers have approximately 435 job openings a year, with an average salary of \$43,278. Similarly, the trade of plumbers, pipefitters and steamfitters average 350 job openings a year with an average yearly salary of \$47,369. Currently, Catholic Charities provides services to over 12,000 middle Tennessee residents a year. The FRC in North Nashville annually serves 1,200 individuals, with 90% classified as low to moderate income. With these two trade industries having nearly 800 job openings a year, it is crucial that Catholic Charities be able to help provide access to skilled trade training for our clients in the North Nashville community. Looking at the Department of Labor statistics for in-demand jobs for Davidson County, the creation of the trades program will give residents in North Nashville and disproportionately underserved communities access to innovative and quality programming that are accessible and creates opportunities to provide a living wage and increase in quality of life.

### **Program Methods and Outcomes**

The Trade Training pilot program is designed for four cohorts of eight-week classes, with ten individuals enrolled in each course. Over the course of a year the pilot would serve up to forty students with a cost per client of \$1591. Classes would be taught by licensed community partners who are our contractors. Over its first year Catholic Charities plans to offer alternating courses of Plumbing and HVAC training at the FRC. Tracking the interest and enrollment in both programs will help our team make adjustments to ensure we are serving the greatest need in the community. At the end of the course the students will not only have the education and training needed to be employable in the field they studied, but also will receive job placement assistance from the FRC, which includes resume writing assistance, job interview coaching, and financial literacy education. An unused wing of the building, which was formerly an elementary school, is being renovated to focus solely on workforce development programming. Metro government is investing over \$2,000,000 into the property so that these eight classrooms can house the job training opportunities that the community members are requesting. Pre-apprenticeship opportunities will be offered in classroom-based programs where students will learn the basic skills to enter into a trade. Our pre-apprenticeship path is a partnership with local trade employers designed to prepare individuals to enter and succeed in a Registered Apprenticeship Program (RAP).

This program will also be accessible to all of our neighbors, with a focus on neighbors who were formerly justice-involved. The FRC is forging a potential partnership with the Davidson County Sheriff's Office (DCSO) to assist in the continuing training of the DCSO trades and Adult Education programs. Also, the FRC is home to Judge Rachel L. Bell's Music City Community Court and LEGACY Housing Resource Diversionary Court and Program. In addition to the presence of Judge Bell's Courts, the relationships between the FRC, DCSO, and Judge Bell's Courts have informed our focus on the critical need to support our neighbors that have been involved in the justice system and are returning to our community. The creation of this program would be one way to provide a pathway to success.

Catholic Charities of Tennessee, Inc.  
Workforce Development Expansion Project Budget  
FY21-22

Expenses	Project Total	Description
Instructor Fees	\$ 20,000	Fees for a full year instructor for 4 days a week Employee for 15 hrs a week to manage instructors and students, oversee recruitment, enrollment, and other administrative duties for this program.
Program Assistant	\$ 11,700	
Indirect Cost	\$ 5,785	Calculated at 10% Hand and power
Tools	\$ 3,200	tools This covers a full year/curriculum
Class Project Materials	\$ 2,500	materials. Materials involved in Lab setup, not including classroom
Lab Materials	\$ 5,100	desks)
Student table	\$ 1,500	Quantity: 10
Chairs	\$ 1,500	Quantity: 20
Workbench	\$ 1,250	Quantity: 5
Whiteboard	\$ 300	Quantity: 1
Computer	\$ 1,200	Quantity: 1 (1) Large HDTV or projector with
Display	\$ 300	screen (1) Video/audio for content creation and
Multimedia	\$ 500	capture (40) Consumable learning materials such as handouts, binders, writing utensils, books, basic
Learning materials	\$ 6,000	hand tools
Field trips	\$ 800	Quantity: 8 Applications/authorizations e.g. THEC or similar trade
Fees	\$ 1,200	credentials Trade organizations e.g. ACCA (HVAC) PHCC (Plumbing) - not firm these are just examples
Memberships	\$ 800	
<b>TOTAL PROJECTED EXPENSES</b>	<b>\$ 63,635</b>	
<b>Number of students served</b>	<b>40</b>	
<b>Cost per student:</b>	<b>\$1,591</b>	

## Northern Middle Key Performance Indicators

January 1, 2021 - December 31, 2021

Time progression 25%

PROGRAM	TARGET	Actual as of 3/31/2021	% of Goal
Adult, Dislocated Worker & NDWG (New Enrollments)	995	297	30%
Youth (New Enrollments)	403	39	10%
Adult Education (New Enrollments)	2151	506	24%
Adult Education/NICE (IELCE) (New Enrollments)	611	50	8%
Wagner Peyser	3851	1195	31%
Senior Community Service Employment Program (SCSEP) (Exits)	10	5	50%
Re-Employment Services & Eligibility Assessment (RESEA) (Co-Enrollments)	73	0	0%
Trade Adjustment Assistance (TAA) (Co-Enrollment Rate)	100.0%	50.0%	50%
Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T) (New Enrollments)	630	295	47%
Jobs for Veterans State Grants (JVSG) (New Enrollments)	146	19	13%
Justice Involved Individuals (New Enrollments)	294	64	22%



STATE OF TENNESSEE  
**DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT**  
DIVISION OF WORKFORCE SERVICES  
220 French Landing Drive  
Nashville, TN 37243-1002  
(615) 741-1031

**Workforce Services Policy – Key Performance Indicators**

**Effective Date:** June 18, 2021

**Duration:** June 30, 2023

**Purpose:**

The purpose of this policy is to establish key performance indicators (KPIs) as hard targets and to define the KPI performance period. Tennessee's KPIs demand streamlined service delivery and quality collaboration among all workforce partners. Each year, the latest set of KPI metrics are approved by the State Workforce Development Board (SWDB). Each quarter, the SWDB reviews KPI achievement-fostering sustained excellence, improved outcomes, and the promotion of workforce services to the greatest number of individuals with significant barriers to employment (SBE).

**Scope:**

Office of the Governor, Tennessee Department of Labor and Workforce Development (TDLWD); Division of Workforce Services (WFS); Tennessee Department of Economic and Community Development (ECD); Tennessee Department of Education (TNED); Tennessee Department of Human Services (DHS); State Workforce Development Board (SWDB); Title I – Adult, Dislocated Worker, and Youth Programs, Title II – Adult Education and Family Literacy Act Program(AE); Title III – Wagner-Peyser Act Program (WP); Title IV – Vocational Rehabilitation Program (VR); Regional Planning Council (RPC); Local Workforce Development Boards (LWDB); Local Workforce Development Areas (LWDA); American Job Center (AJC); One-Stop Operator (OSO); Workforce System Sub-Recipients (Sub-Recipients); Workforce System Partners (Partners)

**Background:**

To become the best public workforce system in the nation, KPIs quantify and track Tennessee's implementation of the Workforce Innovation and Opportunity Act (WIOA).

KPIs foster:

- Increased access to education, training, and employment- particularly for people with significant barriers to employment.
- A comprehensive, high-quality workforce development system by aligning workforce investment, education, and economic development.
- Improvement in the quality and labor market relevance of workforce investment, education and economic development efforts.
- Improvement in the structure and delivery of services.
- Increased family-sustaining employment, meet employer need, and enhance the productivity and competitiveness of Tennessee.

## **I. Key Performance Indicator (KPI) Scope:**

The following are lists of KPI subjects. Key performance indicators are designed to deal with all WIOA programs, SBE groups and the connections between them. These lists are not exhaustive. Programs, groups, or sub-groups may be added or removed in alignment with state, regional, and local priorities.

### **A. Programs:**

Business Solutions  
Jobs for Veterans State Grants  
Reemployment Services and Eligibility Assessment  
Senior Community Service Employment Program  
SNAP Employment and Training  
Temporary Assistance for Needy Families (TANF)  
Trade Adjustment Assistance  
WIOA Title I - Adult and Dislocated Worker and Youth  
WIOA Title II - Adult Basic Education and Integrated English Language and Civics Education  
WIOA Title III - Wagner-Peyser  
WIOA Title IV – Vocational Rehabilitation  
YouthBuild

### **B. Significant Barrier to Employment Groups:**

Individuals with SBEs include the fourteen (14) populations of:

- Displaced homemakers<sup>1</sup>
- Low-income individuals or recipients of income-based public assistance<sup>2</sup>
- Native Americans<sup>3</sup>
- Individuals with mental or physical disabilities, including the recipients of Social Security Disability Insurance<sup>4</sup>
- Those age 55 and older<sup>5</sup>
- Justice-involved individuals<sup>6</sup>
- Individuals experiencing or have experienced homelessness<sup>7</sup>
- Youth in or have aged out of the foster care system

<sup>1</sup> WIOA Section 3(16)

<sup>2</sup> WIOA Section 3(36)

<sup>3</sup> WIOA Section 166(b)

<sup>4</sup> WIOA Section 3(25)

<sup>5</sup> WIOA Section 3(39)

<sup>6</sup> WIOA Section 3(38)

<sup>7</sup> 'Homeless individual' is defined in the Violence Against Women Act of 1994 Section 41403(6); 'Homeless children and youths' is defined in the McKinney-Vento Homeless Assistance Act Section 725(2)

- Individuals who are:
  - English language learners<sup>8</sup>
  - Individuals who have low levels of literacy – unable to compute or solve problems, or read, write, or speak English at a level necessary in order to function on the job, in an individual's family, or in society
  - Individuals facing substantial cultural barriers – participants, at program entry, perceives themselves as possessing attitudes, beliefs, customs, or practices that influence a way of thinking, acting, or working that may serve as a hindrance to employment including non-traditional employment<sup>9</sup>
- Eligible migrant and seasonal farmworkers<sup>10</sup>
- Individuals within two years of exhausting lifetime TANF eligibility
- Single parents – including pregnant women
- Long-term unemployed – unemployed for 27 or more consecutive weeks<sup>11</sup>
- Other groups as the Governor determines to have barriers to employment

## **II. Key Performance Indicator Roles and Responsibilities:**

### **A. Roles and Responsibilities**

The following identifies roles and responsibilities relating to KPIs:

#### **1. State Workforce Development Board (SWDB):**

- Provides the strategic vision for Tennessee's public workforce system
- Upon review of SWDB staff recommendation, determines state annual KPI targets
- Approves quarterly and annual KPI targets
- Monitors, on a quarterly basis, KPI achievement

#### **2. State Workforce Development Board Staff (SWDB Staff):**

- Recommend state target guidelines and for each KPI measuring device
- Following the KPI negotiations, submit a KPI target proposal to the SWDB
- Divides annual state target guidelines into Grand Planning Regions
- Reviews and analyzes LWDB staff KPI target proposals
- Leads KPI target negotiations with LWDB staff
- Runs and analyzes targeted KPI reports to identify trends, best practices, and areas for significant improvement
- Facilitates and leads KPI-related technical assistance
- Recommends the adoption or revision of piloted or established KPI measuring devices
- Analyzes the efficiency of WIOA funds in relation to KPIs
- Provides opportunities for improvement using monitoring, sanctions, and corrective action
- Creates public facing KPI dashboards

#### **3. Regional Planning Councils:**

- Identify and respond to regional strengths, weaknesses, opportunities, and threats
- Make a proposal to LWDBs on how best to divide regional KPI guidelines into LWDBAs

<sup>8</sup> WIOA Section 203(7)

<sup>9</sup> WIOA Section 3(37)

<sup>10</sup> WIOA Section 167(i)(1-3)

<sup>11</sup> As defined by the United States Bureau of Labor Statistics' Current Population Survey

#### 4. Local Workforce Development Boards (LWDB):

- Consider the KPI target proposal of the respective Regional Planning Council before independently submitting quarterly proposed KPI targets to SWDB staff for review
- The Executive Director negotiates KPI targets with SWDB staff
- Following KPI negotiation, submit a KPI target proposal to the SWDB staff

### III. KPI Performance Period:

- A. Beginning July 1, 2021, KPIs in **Attachment 1** will become “hard targets”. Failure to achieve the hard targets will affect the LWDB performance and potential funding.
- B. KPI Performance Periods:
- Quarter 1: July 1 – September 30
  - Quarter 2: October 1 – December 31
  - Quarter 3: January 1- March 31
  - Quarter 4: April 1 -June 30
  - Year: July 1 – June 30
- C. The following are key dates for the establishment of KPI targets for the performance year:
- February 1: SWDB staff issues annual target guidelines to the Regional Planning Councils.
  - March 1: LWDBs submit proposed quarterly and annual targets to the SWDB staff.
  - March 15 -March 31: Negotiations occur between LWDB staff and SWDB staff.
  - May 15: All WIOA Assistant Commissioners and LWDB Chairs submit all proposed annual and quarterly KPI targets for the performance period to the SWDB for approval.

### IV. Monitoring and Technical Assistance:

The KPI assessment weight and the KPI achievement scale are the two tools for KPI evaluation. SWDB staff use these tools to monitor each KPI measuring device and rapidly implement a graded response in accordance with each KPI achievement level and subject-matter expertise.

#### A. Assessment Weight:

The KPI assessment weight tool outlines the percentage each evaluation period is valued relative to the final KPI score. As shown in the table below, each period of evaluation is weighted equally at 20 percent- requiring year-round excellence.

<b>Evaluation Period</b>	<b>Weight</b>
Quarter 1	20%
Quarter 2	20%
Quarter 3	20%
Quarter 4	20%
Annual	20%
<b>Total</b>	<b>100%</b>

#### B. Achievement Scale:

As indicated below, the KPI assessment scale tool has six (6) levels of KPI achievement. This tool rapidly identifies best practices and opportunities for improvement. By evaluating the achievement of each KPI measuring device, SWDB staff responses can be prioritized to improve efficiency and strategic alignment. Each KPI measuring device will measure each program and SBE group.

<b>Achievement Levels</b>
<b>0-</b> Unacceptable
<b>1-</b> Needs Significant Improvement
<b>2-</b> Needs Improvement-
<b>3-</b> Approaching Target
<b>4-</b> Target achieved
<b>5-</b> Best practice- significantly above target

If the achievement of a KPI measuring device is determined to be either “unacceptable”, “needs significant improvement” or “needs improvement”- those devices are required for corrective action as outlined within the *Sanctions for Failure to Meet Federal and State Standards* policy. This achievement group requires significant assistance to achieve state, regional, and local goals.

The appropriate response to KPI measuring devices within the “approaching target” achievement level should be dictated in part due to a trend analysis. The KPI measuring devices within this group may have fluctuated and may be subject to sanctions. This achievement group should minimize ineffective methods in service delivery and maximize opportunities for future growth.

Monitoring conducted through annual reviews of fiscal and program requirements will inform the corrective action process if the reviews result in a finding(s). After the monitoring review is conducted, an exit conference will be scheduled with the sub-recipient to discuss any findings or observations. An official written report will follow the exit conference to list out the findings and/or observations. This report will provide instruction on how, where, and when to submit a corrective action plan. The written report will be sent to the sub-recipient within thirty (30) business days from the exit conference. After the report is received by the sub-recipient, they will have thirty (30) business days to submit that information to [Workforce.Board@tn.gov](mailto:Workforce.Board@tn.gov). Any communication regarding the submitted Corrective Action Plan will need to be responded to within thirty (30) business days.

KPI measuring devices that are either “target achieved” or “significantly above target” are the most likely sources of best practices. Peer-to-peer learning and further improved coordination among WIOA partners should be encouraged to attain better or more reliable attainment of KPI targets.

For example:

LWDA X has a Title I Adult KPI goal of 180 new enrollments, with the program-specific achievement thresholds as listed in the table below.

<b>Achievement Levels</b>	<b>Thresholds</b>
<b>0-</b> Unacceptable	0 to 20%
<b>1-</b> Needs Significant Improvement	21 to 50%
<b>2-</b> Needs Improvement-	51 to 70%
<b>3-</b> Approaching Target	71 to 90%
<b>4-</b> Target achieved	91 to 110%
<b>5-</b> Best practice- significantly above target	110%+

<b>Evaluation Period</b>	<b>Target</b>	<b>Actual</b>	<b>Percentage</b>	<b>Weight</b>	<b>Title I Adult KPI Score</b>	<b>Achievement Level</b>
Quarter 1	40	35	87.5%	20%	17.5	Approaching Target (3)
Quarter 2	40	30	75.0%	20%	15.0	Approaching Target (3)
Quarter 3	60	45	75.0%	20%	15.0	Approaching Target (3)
Quarter 4	40	50	125.0%	20%	25.0	Best Practice (5)
Annual	180	160	88.0%	20%	17.6	Approaching Target (3)
				100%	90.2	<b>Target Achieved</b>

Accompanying this evaluative process is the proactive provision of comprehensive quarterly technical assistance (TA). This TA prioritizes all state, regional, and local strategic goals, fosters the promotion of best practices, and provides opportunities for further collaboration among geographic areas and workforce partners.

In combination with fiscal and compliance-based metrics, high levels of KPI achievement indicate high achieving LWDBs which may be eligible to receive performance-based incentive contracts.

**Attachments:**

Attachment 1: Negotiated Key Performance Indicator Targets

**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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State Workforce Development Board Chair, Tim Berry

PY20 Q2 WIOA Core Performance Measures	47140 Northern Middle		
	Pass/Fail		Pass
Adult Measures	Negotiated	Actual	% of Goal
Exiters	NA	685	NA
Participants Served	NA	1393	NA
EER 2nd Qtr after exit	82.0%	81.6%	99.5%
EER 4th Qtr after exit	82.0%	79.5%	97.0%
Med. Earnings	\$ 6,650.00	\$ 7,469	112.3%
Cred. Attainment	63.0%	59.8%	94.9%
MSG	52.0%	71.8%	138.1%
Dislocated Worker	Pass/Fail		Pass
	Negotiated	Actual	% of Goal
Exiters	NA	380	NA
Participants Served	NA	857	NA
EER 2nd Qtr after exit	82.0%	84.6%	103.2%
EER 4th Qtr after exit	82.0%	82.4%	100.5%
Med. Earnings	\$ 7,600.00	\$ 9,303	122.4%
Cred. Attainment	64.0%	59.3%	92.7%
MSG	48.0%	67.5%	140.6%
Youth	Pass/Fail		Pass
	Negotiated	Actual	% of Goal
Exiters	NA	347	NA
Participants Served	NA	745	NA
EER 2nd Qtr after exit	76.0%	77.0%	101.3%
EER 4th Qtr after exit	75.0%	81.6%	108.8%
Cred. Attainment	69.0%	68.4%	99.1%
MSG	45.00%	55.0%	122.2%

## ETPL Program Review

New Provider Requiring Board Review for Approval							
Staff Recommendation: Board discussion about flight training programs							
Provider Name	Provider Main Address	Approval Agency	Approval Status	Sector Strategy	Years in Business	Site Visit	
Highland Rim Aviation	Springfield	Tennessee Higher Education Commission	THEC Exemption	Transportation and Logistics	18 months	Yes Freda Hendon	
Frequency Change Aviation	Nashville	Tennessee Higher Education Commission	THEC Exemption	Transportation and Logistics	1 year	No	

New Programs Requiring Board Review for Approval							
Staff Recommendation: Board Discussion (see above)							
Provider Name	Provider Main Address	Program Name	Total Cost	Job Outlook	Credential Earned	Program Length	Sector Strategy
Highland Rim Aviation	Springfield	Private Pilot Course	\$9,330.00	Bright Outlook	FAA Private Pilot License	40 Weeks	Transportation & Logistics
Frequency Change Aviation	Nashville	Commercial Pilot License Training - Airplane	\$4,100.00	Bright Outlook	Commerical Pilot License	2 weeks full-time; 6 weeks part-time	Transportation & Logistics
Frequency Change Aviation	Nashville	Flight Instructor - Airplane	\$3,125.00	Bright Outlook	Certified Flight Instructor	9 weeks full-time; 20 weeks part-time	Transportation & Logistics
Frequency Change Aviation	Nashville	Private Pilot - Airplane License Training	\$10,775.00	Bright Outlook	Private Pilot License	3 months full-time; 12 months part-time	Transportation & Logistics
Frequency Change Aviation	Nashville	Private Pilot - Instrument Rating Airplane	\$10,775.00	Bright Outlook	Instrument Rating - Airplane	12 weeks full-time; 12 months part - time	Transportation & Logistics
Mid TN Aviation Academy	Clarksville	Multi-Engine Rated Pilot	\$9,225.00	Bright Outlook	Pilot Multi-Engine Land	12 weeks	Transportation & Logistics
Staff Recommendation: Approval							
Austin Peay State University	Clarksville	Project Management Professional Exam Prep Webinar - Live Online	\$1,692.00	Bright Outlook	PMP	3 Weeks	Information Technology
Austin Peay State University	Clarksville	EMT - Emergency Medical Technician Training	\$2,500.00	Bright Outlook	EMT License	3 Months	Healthcare

### Former Programs Requiring Board Review for Approval

*Staff Recommendation: Approve for one year due to lack of WIOA enrollment history; re-evaluate in one year.*

Provider Name	Provider Main Address	Program Name	Total Cost	Job Outlook	Credential Earned	Program Length	Sector Strategy
NASHVILLE GENERAL HOSPITAL AT MEHARRY	Nashville	Certified Nursing Assistant Program <i>**Did not resubmit for approval</i>	\$ 851.00	Bright Outlook	Occupational Skills Certificate	96 Hours 12 weeks In-person	Health Care
Volunteer State Community College	Gallatin	Phlebotomy <i>**Did not resubmit for approval</i>	\$ 1,112.00	Bright Outlook	Occupational Skills Certificate	100 hours 11 weeks Hybrid	Health Care

*Staff Recommendation: Do not approve due to lack of credential and prior unsuccessful performance.*

NASHVILLE STATE COMMUNITY COLLEGE	Nashville	SOFT SKILLS SUITE (ONLINE)	\$ 395.00	N/A	None	96 hours	N/A

### ADDITION AFTER COMMITTEE MEETING

### Former Programs Requiring Board Review for Approval

*Staff Recommendation: Approve for one year due to lack of WIOA enrollment history; re-evaluate in one year.*

Provider Name	Provider Main Address	Program Name	Total Cost	Job Outlook	Credential Earned	Program Length	Sector Strategy
TENNESSEE COLLEGE OF APPLIED TECHNOLOGY AT HARTSVILLE	Hartsville	ADMINISTRATIVE OFFICE TECHNOLOGY	\$4,931.00	Bright Outlook	Occ. Skills Certificate	12 months	N/A
TENNESSEE COLLEGE OF APPLIED TECHNOLOGY AT HARTSVILLE	Hartsville	MACHINE TOOL TECHNOLOGY	\$6,337.00	Bright Outlook	Occ. Skills Certificate	20 months	Advanced Manufacturing

# ETPL Progress: Federal Monitoring

The ETPL program listing review was completed in late March. The number of programs was reduced from more than 1,300 to 584.

We provided numerous individual virtual calls with providers to facilitate the review, and offered a virtual Zoom workshop on April 7 to educate providers about the upcoming monitoring and to answer questions about the program changes. More than 50 people participated in the Zoom Workshop.



100%



*OVERALL PERCENTAGE OF PROGRAMS TO BE MONITORED = 20%*

Monitoring guidance requires 15% of each provider's programs to be monitored. That equals 122 programs randomly selected for monitoring in 2021. The numbers range from one to 16 per provider depending on the number of programs included on the ETPL.



*30% OF SELECTED PROGRAM MONITORING HAS BEEN COMPLETED AS OF 4/28/2021*

In 2021, the monitoring is focused on complete data entry by the provider, as well as documented authorization by an approved agency. Performance data will be submitted after June 30, 2021.



# Northern Middle Tennessee Workforce Board Inc.

May 6, 2021

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## Executive Summary

### Adult Priority of Service Policy

**1. What is the purpose of this policy?**

To provide guidance for American Job Center Staff on the implementation of priority of service for career and training services.

**2. What are the notable guidelines conveyed within this policy?**

- Describes the statutory priority for Adult funds
- Describes Veteran's priority of service and Adult priority and how to apply it
- Establishes any covered person who is seeking WIOA services must be provided priority of service at their "point of entry" into the workforce system.
- Defines the percentage of priority populations that are to be served.

**3. What are the modifications to this policy:**

"Point of Entry" Priority of Service definition was added per Tennessee Department of Labor and Workforce Development's Adult Priority of Service Guidance.

Added requirement that seventy- five (75%) of individuals enrolled in the title I Adult program must meet one of the top four (4) priority levels contained within the policy.



## **Priority of Service Policy**

### **Purpose**

This policy provides guidance for American Job Center staff on the requirements for providing priority of service to all covered persons and identified populations.

### **Background**

WIOA establishes a priority requirement for the use of funds allocated to a local area for certain adult employment and training activities. Under WIOA sec. 134(c)(3)(E), American Job Center Staff must give priority of service to recipients of public assistance, low-income individuals, and individuals who are basic skills deficient when using WIOA Adult program funds to provide individualized career services and training services. These priorities are in addition to the requirements in the WIOA regulations at 20 CFR 680.650 that veterans and their eligible spouses receive priority of service for all Department of Labor (DOL)-funded job training programs, including the WIOA Adult program.

### **Policy & Instructions**

#### **A. Priority of Service Defined**

“Priority of Service” means the right to take precedence over a person with lower priority in obtaining employment and training services. WIOA implements priority of service to recipients of public assistance, low-income individuals, and those who are basic skills deficient. These priorities are in addition to the requirements that veterans and their eligible spouses receive priority of service.

#### **B. Priority Populations Defined**

1. **Veteran** – a veteran is a person who has served at least one (1) day of active duty in the military, naval, or air service, and who was discharged or released from such service with other than a dishonorable discharge.
2. **Eligible Spouse** – an eligible spouse must meet one (1) of the following qualifications:
  - A spouse of any veteran who died of a service-connected disability
  - A spouse of any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than ninety (90) days:
    - Missing in action
    - Captured in the line of duty by a hostile force, or
    - Forcibly detained or interned in the line of duty by a foreign government or power;
  - A spouse of a veteran who has a total disability resulting from a service-connected disability, as evaluated by the department of Veteran Affairs; or
  - A spouse of any veteran who died while a disability was in existence.

A spouse will lose eligibility if it is derived from a living veteran, or a service member, who loses their status which made them eligible. Such a situation would be: if a veteran, with a total service-connected disability, were to receive a revised-disability rating at a lower level.

Similarly, a spouse, whose eligibility is derived from a living veteran or service member, would lose that eligibility upon a divorce from that veteran or service member.

The spouse of a veteran who died as the result of a service-connected disability, or died while a disability was in existence, would not lose covered status through subsequent remarriage.

3. **Low-Income Individual** – a low-income individual is defined as a person who meets any of the following criteria and will satisfy the low-income requirement for WIOA Title I Adult services:

**Recipient of public assistance** - individuals who receive, or in the past six (6) months have received, or are a member of a family that is receiving or the in the past six (6) months has received assistance through one or more of the following:

- Supplemental Nutrition Assistance Program (SNAP)
- Temporary Assistance for Needy Families (TANF)
- Supplemental Security Income (SSI)
- Other State or local income-based public assistance

**Low-Income Includes**

- Recipients of public assistance (defined above),
- Individuals in a family with total family income below seventy percent (70%) of the lower living standard income level,
- Homeless
- Foster youth, or
- Individuals with disabilities with an income below seventy percent (70%) of the lower living standard income level

A youth eighteen (18) or older, who was determined to be a low-income individual eligible for the WIOA Title I Youth program, may be co-enrolled in the WIOA Title I Adult program without an additional determination of eligibility. They may be counted as an individual who meets adult priority of service if the original determination was made no more than six (6) months prior to the date of co-enrollment.

Under WIOA, an individual with a disability, whose family does not meet income eligibility criteria, will qualify for priority as a low-income adult.

**Criteria and Procedure Used to Determine Low-Income Eligibility**

American Job Center (AJC) Staff will utilize the Income Worksheet to determine low income eligibility. Please see ***Workforce Services Guidance – Income Guidelines for Persons Defined as Low-income Individuals*** for additional information on who qualifies as low-income.

4. **Basic Skills Deficient** – WIOA defines basic skills deficient as “an individual who is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual’s family, or in society.”

**Criteria and Procedure Used to Determine Basic Skills Deficient**

Basic skills deficiency will be determined by an objective, valid, and reliable assessment such as the Test for Adult Basic Education (TABE) or Comprehensive Adult Student Assessment Systems (CASAS) and must be maintained in the individual’s electronic case file to include the participant’s name, date of test, and results.

5. **Underemployed** – an individual who is employed full or part-time at an hourly wage of \$12.00 or less. An underemployed individual must also meet the definition of a low-income individual in order to be eligible for the adult priority.
6. **Covered Person** – an individual who meets the above definition of veteran or eligible spouse.

### **C. “Point of Entry” Priority of Service**

Any covered person who is seeking WIOA services must be provided priority of service at their “point of entry” into the workforce system. The “point of entry” includes physical locations, such as AJCs, as well as websites and other virtual service delivery resources.

### **D. Employment and Training Priority of Service**

The priority of service for veterans and eligible spouses always applies across all qualified employment and training programs. The priority of service for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient is a statutory priority that applies only to the recipient of individualized career and training services in the WIOA Title I Adult program.

#### **How to Apply Priority of Service**

Priority of service must be provided in the following order:

1. Veterans and eligible spouses who are recipients of public assistance, low-income individuals, or individuals who are basic skills deficient receive first priority for services;
2. Individuals (not veterans or eligible spouses) who are recipients of public assistance, low-income individuals, or individuals who are basic skills deficient and meet Title I Adult program eligibility receive second priority for services;
3. Veterans and eligible spouses who do not meet the statutory priority (of public assistance recipients, other low-income individuals, or those who are basic skills deficient), but meet Title I Adult program eligibility then receive third priority for services;
4. Other individuals (not veterans or eligible spouses) who do not meet the above priorities, but who meet Title I Adult program eligibility, are unemployed, and is an individual with one of the following barriers to employment, receives fourth priority for services.
  - Indians, Alaska Natives, and Native Hawaiians;
  - Individuals with disabilities;
  - Older individuals (age 55 and older);
  - Ex-offenders;
  - Homeless individuals;
  - Youth who have aged out of the foster care system;
  - Individuals who are:
    - English language learners,
    - Individuals who have low levels of literacy; and
    - Individuals facing substantial cultural barriers;
  - Eligible migrant and seasonal farm workers;
  - Single parents (including single pregnant women)
  - Long-term unemployed individuals (unemployed for 27 or more consecutive weeks)

5. Persons outside the groups given priority under WIOA but meet Title I Adult program eligibility, then receive the fifth level of priority for services.

**Seventy-five percent (75%) of individuals enrolled in the Title I Adult program must meet one of the top four (4) priority levels listed above.**

### References

WIOA Section 3(24), WIOA Section 134(c)(4)(E), 20 CFR 680.600, 20 CFR 680.640, 20 CFR 680.650, 20 CFR 683.230, 20 CFR 688.31, TEGL 7-20, TEGL 19-16, Workforce Services Policy – Priority of Service for Adults, Veterans, and Eligible Spouses, Workforce Services Guidance – Persons Defined as Low-income Individuals

Authorized by:

Approved by:

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Marla Rye, Executive Director

Date

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John Zobl, Chairman

Date



# Northern Middle Tennessee Workforce Board Inc.

May 12, 2021

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## Executive Summary

### Grievance and Complaint Resolution Policy

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

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

**2. What are the notable guidelines conveyed within this policy?**

- Describes the complaint and/or grievance process that are non-discriminatory in nature
- Describes the discriminatory complaint process

**3. What are the modifications to this policy?**

The policy was updated to reflect new forms and reporting deadlines.

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

### **Purpose**

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

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

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

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

### **Policy & Instructions**

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

##### **WIOA Section**

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

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

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

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

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

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

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

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

Northern Middle Workforce Board  
Equal Opportunity Officer  
523 Madison Street  
Suite A  
Clarksville, TN 37040  
TTY/TDD: 1-800-848-0299

TN Dept. of Labor & Workforce Development  
Attn: EO Officer  
220 French Landing Drive  
Nashville, TN 37243  
Phone: 615-253-1331  
TTY/TDD: 615-532-2879

US Department of Labor  
Director, Civil Rights Center  
US Department of Labor  
200 Constitution Avenue, NW  
Room N - 4123  
Washington, DC 20210  
TTY: 202-693-6516

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

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

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

Board to issue that Notice before filing a complaint with the Civil Rights Center. However, the individual must file with the Civil Rights Center within 30 days of the 90 day deadline.

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

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

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

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

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

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

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

be notified in writing of the time by which a decision will be made.

- i. If a resolution is not obtained at the local level within sixty (60) days of the filing of the complaint, or either party is dissatisfied with the local hearing decision, an appeal may be filed with the Tennessee Department of Labor and Workforce Development (TDLWD) at [WIOA.complaints@tn.gov](mailto:WIOA.complaints@tn.gov). The TDLWD decision may be appealed to the Secretary in the event that a decision has not been reached within sixty (60) days, or a decision has been reached and the party wishes to appeal to the Secretary.
- j. An individual party to a collective bargaining agreement, alleging a labor standards violation, may also submit the grievance to a binding-arbitration procedure.

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

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

#### **I. Complaints to the Labor Standards Unit:**

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

More information can be accessed at <https://www.tn.gov/workforce/employers/safety---health/regulations-compliance/regulations---compliance-redirect/labor-standards-unit.html>

#### **II. Complaints to TOSHA:**

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

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

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

### **D. American Job Center Partner Reporting Due Dates:**

The following list details requirements for American Job Center (AJC) Complaint Log submissions to the OSO and local Board:

Reporting periods and deadlines for complaint log submissions are as follows:

<b>Quarters</b>	<b>Fiscal Year Reporting Periods</b>	<b>Deadlines for Submission</b>
Quarter 1	October 1 to December 31	January 15
Quarter 2	January 1 to March 31	April 15
Quarter 3	April 1 to June 31	July 15
Quarter 4	July 1 to September 31	October 15

All processes and procedures described in this policy will be made available in hard copy and posted on the Northern Middle Tennessee Workforce Board website at [www.nm-wb.com](http://www.nm-wb.com).

Authorized by:

Approved by:

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

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

	Local Workforce Development Area Complaint Form
American Job Center Name:	
American Job Center Type:	
Address of One-Stop Center:	
City, State, Zip Code of One-Stop Center:	
Phone Number of One-Stop Center or Employer:	(       )       -
Date Complaint is Filed:	
Name of Complainant (Last, First, Middle Initial):	
Phone Number of Complainant:	(       )       -
Name of Individual or Organization Complaint is Against:	
Name of Staff Addressing Complaint:	

Complaints referred to Other State Departments:	
Labor Standards Unit:	<ul style="list-style-type: none"> <li>Request inspections of child-labor</li> <li>Request inspections of non-smoker protection</li> <li>Processes claims for unpaid wages</li> <li>Investigate if there are allegations of unlawful hiring practices related to illegal aliens and whether workers are lawfully authorized to work.</li> </ul>
Tennessee Occupational Hazard Safety Administration:	<ul style="list-style-type: none"> <li>Request inspections if concerned with the possible existence of safety and health hazards.</li> </ul>
Date of Referral	
Complaints referred to Local EO Officer:	
Discrimination or denial of equal opportunity to participate in WIOA program	
Workplace discrimination or denial of equal opportunity against employer receiving WIOA funds	
Date Submitted to Local EO Officer (if applicable):	
Complaints referred to Executive Director:	
Unjust denial of WIOA services, but not discriminatory in nature	
Hostile work environment against employer related to WIOA-funded program	
Other Complaints against employer related to WIOA-funded program	
Date Submitted to Executive Director (if applicable):	

Please include following documentation in this PDF:	
Employment and Training Administration Complaint/Apparent Violation Form (ETA Form 8429)	
Email correspondence related to the complaint	
Meeting minutes regarding any in-person adjudication	
Documentation to support eligibility to receive WIOA services	
Date submitted to WIOA.Complaints@tn.gov	



U.S. Department of Labor  
Employment and Training Administration

OMB Approval No. 1205-0039  
Expiration Date: 07/31/2023

For Official Use Only **Complaint/Apparent Violation Form<sup>1</sup>**

Complaint/Apparent Violation No.		Date Received	
<b>Part I. Contact Information<sup>2</sup></b>		<b>Respondent's Information<sup>3</sup></b>	
1. Name of Complainant/(Last, First, Middle Initial) <sup>4</sup>		4. Name of Person, Company, or Agency the Complaint is Made Against	
2a. Permanent Address (No., St., City, State, ZIP Code)		5. Name of Employer (if different from Part I #4 above) /One-Stop Office	
b. Temporary Address (if Appropriate)		6. Address of Employer/One-Stop Office	
3a. Permanent Telephone ( ) -	b. Temporary Telephone ( ) -	7. Telephone Number of Employer/One-Stop Office ( ) -	
8a. Description of Complaint or Apparent Violation (If additional space is needed, use separate sheet(s) of paper and attach to this form)			

8b. ☐ I hereby give authorization to: \_\_\_\_\_ to act on my behalf regarding this complaint.  
Phone #: ( ) - Address: \_\_\_\_\_

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

9. Signature of Complainant <sup>5</sup>	10. Date Signed
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<sup>1</sup> For information regarding complaints that are covered through the Employment Service and Employment-Related Law Complaint System see 20 CFR 658 Subpart E.

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

<sup>3</sup> For definition of "Respondent" see 20 CFR 651.10.

<sup>4</sup> Pursuant to 658.400(d), "A complainant may designate an individual to act as his/her representative." If the complainant has a designated representative, the name and contact information of the designated representative must be provided in 8b.

<sup>5</sup> No signature is required at Part 9 if this form is submitted as an Apparent Violation. If the form is submitted as a complaint and a designated representative is acting on behalf of the complainant, the designated representative must sign here.

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**Part II. For Official Use Only**

<p><b>1. Migrant or Seasonal Farmworker?</b>  <input type="checkbox"/> Yes    <input type="checkbox"/> No</p> <hr/> <p><b>2. Complaint or Apparent Violation Employment Service Related ("X" Appropriate Box(es))</b></p> <p><input type="checkbox"/> Complaint against the Employer</p> <p><input type="checkbox"/> Apparent violation involving the Employer</p> <p><input type="checkbox"/> Complaint against the Local Employment Service Office</p> <p><input type="checkbox"/> Apparent violation involving the Employment Service Office</p> <p><b>2a. Job Order No, if available:</b>          _____</p> <p><b>3. Complaint or Apparent Violation Employment-Related Law:</b>  <input type="checkbox"/> Yes    <input type="checkbox"/> No</p>	<p><b>4. Issue(s) involved in Complaint or Apparent Violation ("X" Appropriate Box(es)):</b></p> <table border="0"> <tr> <td>Wage Related</td> <td>Housing</td> </tr> <tr> <td>Child Labor</td> <td>Pesticides</td> </tr> <tr> <td>Health/Safety</td> <td>Discrimination</td> </tr> <tr> <td>Transportation</td> <td>Trafficking</td> </tr> <tr> <td colspan="2">Sexual harassment/coercion/assault</td> </tr> <tr> <td colspan="2">Other (Specify) _____</td> </tr> </table>	Wage Related	Housing	Child Labor	Pesticides	Health/Safety	Discrimination	Transportation	Trafficking	Sexual harassment/coercion/assault		Other (Specify) _____		<p><b>5. If employer is an H-2A/Criteria Employer, is the complainant a:</b>          ("X" Appropriate Box):</p> <p><input type="checkbox"/> U.S. Worker</p> <p><input type="checkbox"/> H-2A Worker</p>
Wage Related	Housing													
Child Labor	Pesticides													
Health/Safety	Discrimination													
Transportation	Trafficking													
Sexual harassment/coercion/assault														
Other (Specify) _____														

6a. Referrals To Other Agencies ("X" Appropriate Box(es)) <input type="checkbox"/> WHD. U.S. DOL. <input type="checkbox"/> OSHA U.S. D.O.L. <input type="checkbox"/> EEOC <input type="checkbox"/> Other _____	7. Address of Referral Agency (No., St., City, State, ZIP Code and Telephone No.) _____ _____ (____)____-____
6b. Next Follow-up Date if complainant is an MSFW	

8. Actions Taken on Complaint/Apparent Violation (If additional space is needed for multiple actions taken, use a separate paper):

Action Taken By: \_\_\_\_\_ On: \_\_\_\_\_  
(First and Last Name) (Date)

Action Taken:

12a. Name and Title of Person Receiving Complaint	12b. Office Address (No., St., City, State, ZIP Code)	
12c. Phone Number ( ) -	12d. Signature	12e. Date

## Public Burden Statement

Persons are not required to respond to this collection of information unless it displays a currently valid OMB Control Number. Obligation to reply is required to obtain or retain benefits (44 USC 5301). Public reporting burden for this collection is estimated to average 2 hours and 30 minutes per response, including the time to review instructions, search existing data sources, gather and maintain the data needed, and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this collection, including suggestions for reducing this burden, to the U.S. Department of Labor, Employment and Training Administration, Office of Workforce Investment, Room C-4510, 200 Constitution Avenue, NW, Washington, DC 20210.

[illegible]



# Northern Middle Tennessee Workforce Board Inc.

May 6, 2021

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## **Executive Summary**

### **Supportive Services Policy**

**1. What is the purpose of this policy?**

The Supportive Service Policy establishes guidelines for supportive services provided to participants in the Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker and Youth programs.

**2. What is the purpose of the update to this policy?**

Clarified sales tax reimbursement allowability for eligible sub-contractors.

## **Supportive Services Policy**

### **Purpose**

The purpose of this policy is to establish guidelines for supportive services provided to participants in the Workforce Innovation and Opportunity (WIOA) Title I Adult, Dislocated Worker, and Youth programs.

### **Background**

Funds allocated to a local area may be used to provide supportive services to adults and dislocated workers who:

- Are participating in programs with activities authorized in WIOA Section 134(c)(1)(A)(ii) or WIOA Section 134(c)(1)(A)(iii);
- Have exited and need post-program support services as follow-up (for up to 12 months after exit); and
- Are unable to obtain such supportive services through other programs providing such services

### **Policy & Instructions**

#### **A. Supportive Services**

Supportive services may be made available to adults or dislocated workers participating in career or training services that is unable to obtain supportive services through other programs providing such services. The supportive services must be necessary to enable the individual to participate in career services or training activities. Supportive services for youth are services that enable an individual to participate in WIOA activities.

Supportive services may include, but are not limited to:

- Linkages to community services
- Assistance with transportation
- Assistance with child care and dependent care
- Assistance with housing
- Needs-related payments
- Assistance with educational testing
- Reasonable accommodations for individuals with disabilities
- Legal aid services
- Referrals to health care
- Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes
- Payments and fees for employment and training-related applications, tests, and certifications

Supportive services are not entitlements and must be supported by demonstration of financial need. The participant's need for the provided service must be documented in the electronic case file in the Individual Employment Plan (IEP) or Individual Service Strategy (ISS) and case notes. The cost of supportive services must be reasonable and competitive in price. When multiple options are available for receiving supportive services, documentation must show a reasonable effort was made to determine and choose the lowest, competitively priced service available.

The maximum amount of funding for supportive services for the Northern Middle Tennessee Workforce Board (NMTWB) is \$4,000 per enrollment. Exceptions may be approved by board staff on a case by case basis. Tips on products or services are not reimbursable for any reason, and may not be waived. Uniform Guidance (2 CFR 200.470 (a.)(1)) states that taxes which a unit is legally required to pay and which are paid or accrued in accordance with the Generally Accepted Accounting Principles, are allowable. Any refund of taxes, and any payment to the non-Federal entity of interest thereon, which were allowed as Federal award costs, will be credited either as a cost reduction or cash refund, as appropriate. Therefore, it would be allowable for sub-contractors to be reimbursed for said taxes as long as they are legally required to pay the tax.

Note that follow-up career services are not a qualifying service for the receipt of supportive services; therefore, an individual who is only receiving follow-up services may not receive supportive services.

Support services may not be used to pay for expenses incurred prior to the participant's enrollment into the WIOA program. Advances against future payments are not allowed. Examples of unallowable services include, but are not limited to:

- a) Fines and penalties such as traffic violations, late finance charges, and interest payments
- b) Entertainment, including tips
- c) Contributions and donations
- d) Vehicle or mortgage payments
- e) Refund deposits
- f) Alcohol or tobacco products
- g) Pet food
- h) Items to be purchased for family or friends
- i) Out-of-state job search and relocation expenses that will be paid by the prospective employer

## **B. Needs-Related Payments**

Needs-related payments are designed to provide a participant with financial assistance for the purpose of enabling them to participate in training services.

To receive needs-related payments

1) Adults and Out of School Youth aged 18-24 must:

- Be unemployed;
- Not qualify for, or have ceased qualifying for, unemployment compensation; and
- Be enrolled in a program of training services under WIOA Section 134(c)(3)

2) Dislocated Workers must:

- Be unemployed; and have ceased to qualify for unemployment insurance or trade readjustment allowance under TAA; and be enrolled in a program of training services under WIOA section 134(d)(4) by the end of the 13<sup>th</sup> week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated work, or if later, by the end of the 8<sup>th</sup> week after the worker is informed that a short term layoff will exceed 6

months; or

- Be unemployed and unable to qualify for unemployment insurance or trade readjustment assistance under TAA and be enrolled in a program of training services under WIOA section 134(c)(3)

The level of a needs-related payment made to a dislocated worker shall not exceed the greater of:

- 1) The applicable weekly level of unemployment insurance compensation for participants who were eligible for unemployment insurance compensation as a result of a qualifying dislocation; or
- 2) The poverty level for an equivalent period, for participants who did not qualify for unemployment compensation as a result of a qualifying layoff. The weekly payment level must be adjusted to reflect changes in total family income, as determined by the NMTWB.

### **C. Priority of Service**

Participants in WIOA programs who face significant barriers to employment — such as recipients of public assistance, low-income individuals, or individuals who are basic skills deficient — should be given service according to their level of need. Please refer to the TDLWD's Priority of Service Guidance concerning the order of service delivery which can be accessed at: <https://www.tn.gov/workforce/contact-the-department0/boards---commissions/boards---commissions-redirect/state-workforce-development-board/wioatechnicalassistance>.

### **D. Duplication of Services**

Funds for supportive services should be monitored to ensure that they are spent in a manner that avoids redundancy. Please refer to the TDLWD's Co-Enrollment of American Job Center Customers Policy for more information concerning co-enrollment of participants in multiple programs and best practices to leverage resources for maximum benefit. This document can be accessed at <https://www.tn.gov/workforce/contact-the-department0/boards---commissions/boards---commissions-redirect/state-workforce-development-board/wioatechnicalassistance>.

### **References**

WIOA Section 3(59); WIOA Section 133; WIOA Section 134(c)(3); 20 CFR 680.900 through 680.970; 20 CFR 681.570; TEGL 19-16; Workforce Services Guidance – LWDA Supportive Services Policy Update Requirements - WIOA

Authorized by:

Approved by:

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

\_\_\_\_\_  
Date

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

\_\_\_\_\_  
Date



## Trade Adjustment Assistance and Reemployment Adjustment Assistance (TAA and RTAA) Co-Enrollment Policy with Title I Dislocated Worker

### Purpose

The purpose of this policy is to ensure TAA and RTAA participants who are Workforce Innovation and Opportunity Act (WIOA) eligible are co-enrolled in the WIOA Title I-B Dislocated Worker program in a seamless manner to facilitate coordination of TAA and RTAA and WIOA services as required by federal and state law. This policy will provide guidance to program administrators and service providers regarding the mandate for co-enrollment of eligible TAA and RTAA participants in the Dislocated Worker (DW) program.

### Background

The U.S. Department of Labor (DOL) published and consolidated TAA and RTAA Final Rule on August 21, 2020. 20CFR 618.325 requires co-enrollment of all TAA and RTAA participants to the WIOA Title I-B Dislocated Worker (DW) program, subject to eligibility, unless the participant declines.

While there is not a corresponding WIOA Final Rule, it is noted that DOL commented on page 51913 of the TAA and RTAA Final Rule that “States, under their Governor-Secretary Agreements, are required to implement the Final Rule. The Governor-Secretary Agreements bind state governments to the terms and conditions of the Agreement and implementation of the TAA and RTAA program, including the co-enrollment requirement, and the ability to enforce the co-enrollment requirement at the state and local levels.”

### Policy

TAA and RTAA participants, including Adversely Affected Incumbent Workers, must be co-enrolled in the WIOA Title I-B DW program if they are determined eligible. The following instructions provide details outlining the co-enrollment process as a means to facilitate integrated service delivery. The One Stop Operator (OSO) will be responsible for ensuring the coordination of partner staff to ensure TAA and RTAA Co-Enrollment occurs as required. The Northern Middle Tennessee Workforce Board will provide needed technical assistance.

### Instructions

- **Enrollment**

The TAA and RTAA Career Specialist will manage the enrollment process for TAA and RTAA participants and will upload the required TAA and RTAA documents as well as the WIOA supplemental application and three signature forms listed below. The TAA and RTAA application and the WIOA supplemental application will be completed by the participant at the time of initial enrollment. Three additional WIOA forms require a participant signature during the initial enrollment:

- Release of Information form
- Conflict of Interest form

- EEO form

The WIOA Supplemental Application, Release of Information form, Conflict of Interest form, and EEO form will be provided to the One Stop Operator (OSO) and the TAA and RTAA specialist in each American Job Center location. In addition, the forms will be provided electronically to the Career Service Provider responsible for the Title I program.

- **Assessment**

The TAA and RTAA career specialist will manage the participant assessment (TABE) during enrollment. Assessment may be administered by an AJC Partner. The WIOA career specialist will utilize the TAA and RTAA assessment and will not require the customer to duplicate efforts.

- **IEP**

The TAA and RTAA career specialist will develop the customer IEP during enrollment. The WIOA career specialist will utilize the TAA and RTAA IEP and will not require the customer to duplicate efforts.

- **Referral**

After the initial enrollment, including the enrollment application, assessment, and IEP, the TAA and RTAA career specialist will provide the enrollment referral paperwork to a WIOA career specialist via email. The WIOA career specialist will create the WIOA application from the TAA and RTAA enrollment documents which will be visible in VOS and coordinate with the TAA and RTAA career specialist regarding services.

- **WIOA Eligibility Determination**

TAA and RTAA program participants will meet the Dislocated Worker program eligibility criteria. However, some may be ineligible for the Dislocated Worker program, including those who do not meet the Selective Service registration requirement, and will therefore be exempt from the co-enrollment mandate.

- **Case Management**

The TAA and RTAA career specialist will serve as the primary career specialist and coordinate services with the WIOA career specialist. The WIOA career specialist will provide and case note additional needs including but not limited to supportive services, documenting justification for services and funds via uploaded documents in VOS. The signature on TAA and RTAA enrollment paperwork will serve as the WIOA signature. The WIOA career specialist will utilize the TAA and RTAA assessment and IEP and will not require the customer to duplicate efforts. The TAA and RTAA 60-day benchmark documented by the TAA and RTAA career specialist will equal the WIOA measurable skills gain (MSG). If the TAA and RTAA participant is not enrolled in training, the WIOA career specialist will provide 30 day case note contact, otherwise the WIOA 30-day case note requirement is waived with TAA and RTAA co-enrollments.

## References

20 CFR 618.325, Integrated service strategies and Workforce Innovation and Opportunity Act co-enrollment, Trade Adjustment Assistance Final Rule, Federal Register, Volume 85, No. 163, August 21, 2020, page 51987.

Training and Employment Guidance Letter (TEGL) 04-20, Guidance on Integrating Services for Trade-Affected Workers under the TAA and RTAA Program with the WIOA Title I DW Program, October 29, 2020.

Authorized by:

Approved by:

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

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