



**Northern Middle Tennessee  
Workforce Board Inc.**

## **Finance Committee**

**August 5, 2022**

**9:00 A.M.**

[Click here for zoom link](#)

Meeting ID: 832 8552 3549

Passcode: 331542

Telephone Number: +1 312 626 6799

## **Agenda**

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### **Welcome**

### **Call the Meeting to Order**

### **Approval of Minutes**

### **Business Reports:**

1. Career Service Provider – Performance Review
2. Financial & Monitoring Reports
  - FY 2021-22 Financial Report
  - FY 2022-23 Revised Budget
  - Monitoring Updates
  - Fiscal Policy Update
3. Action Items

### **Adjourn**

#### **Members:**

Mark Peed (Chair)  
Keith Carnahan  
Dan Caldwell  
David Rutledge  
Paul Webb  
Kristi Spurgeon  
Charles Story

**Complete zoom link:** <https://us02web.zoom.us/j/83285523549?pwd=VmhDaCtHS1VINzhLSlJ1NUd2OXFPdz09>



**Northern Middle Tennessee Workforce Board**

**Finance Committee**

**Meeting Minutes**

**February 3, 2022, via Zoom 9:00 a.m.**

<b>Members Attending</b>	<b>Members Absent</b>	<b>Staff &amp; Guests Attending</b>
John Alexander	David Rutledge	Marla Rye
Mark Peed	Charles Story	Ankur Singla
Keith Carnahan		Christel Brown
Dan Caldwell		Meagan Dobbins
Paul Webb		Ginger Fussell
Kristi Spurgeon		Sherry Maynard

The Finance Committee of the Northern Middle Tennessee Workforce Board met virtually on February 3, at 9 a.m. via Zoom.

Marla Rye called role, and a quorum was declared. The meeting was called to order by Chairman Mark Peed. Mark asked for approval of the minutes. Dan Ryan moved to approve and was seconded by Keith Carnahan. The minutes passed unanimously.

**Audit Report-June 30, 2021**

Marla informed the committee that the June 30, 2021 audit had been issued. She then introduced Ankur Singla from Thurman Campbell to give the report. Ankur expressed his gratitude for the help he received with the audit. Ankur shared the audit report with the committee. He explained the primary sections of the audit report. He clarified that it was a clean audit report with no findings. He informed the members that we qualify as a low-risk auditee.

**Career Service Provider-Performance Review**

Marla continued with an update regarding the contract service provider performance. Marla reported that the contractors have been with us for a year now. EDSI did not meet some of their goals in the fourth quarter. Cumulatively they were close to meeting their enrollment goal. They did not meet their exit goal for the quarter but did meet it cumulatively because of previous strong quarters. Marla expressed concern about their placement rates and their

effect on federal performance standards. While the contractor performance shows a current report of placements, the federal performance standards capture data from the second and fourth quarters after exit. EDSI did not meet the adult placement rate goal for the fourth quarter but did meet the goal cumulatively. They met the fourth quarter youth placement rate goal but did not meet the cumulative goal. Placement wage goals are above average. They still struggle with MPCR and are behind in the youth standards.

MAC has met its enrollment goals for in-school and out-of-school youth for the fourth quarter and cumulatively. Exits are behind, and this is concerning because this means their caseload is increasing. They met their placement rate for the fourth quarter but are behind cumulatively because of poor performance in previous quarters. MAC met its placement wage goal. They continue to struggle with MPCR. Work experience and the in-school youth ratio goals were reviewed.

### **2021-2022 Financial & Monitoring Report**

Ginger Fussell reported that quarter two was comparable to quarter one at just under \$2.5M in expenditures, putting the fiscal year expenditure total just shy of \$5 million. Quarter two saw a slight increase in formula grant fund utilization and a slight decrease in other grant activity. The budget is an ebb and flow of grant availability. Northern Middle received \$754K additional Dislocated Worker funding (there is already an excess of funds compared to Adult). The board previously approved the repurposing of \$1.5M Dislocated Worker funding for Adult program services. We anticipate the need to potentially request \$500K more. There is a new apprenticeship grant for \$168K. There was approximately \$93K of expired, unused funding netting a budget increase of approximately \$828K, resulting in a revised budget of \$15.7M for fiscal year 21-22. The career service providers have increased their expenditures slightly.

Ginger went on to update the committee regarding MPCR. Northern Middle calculates the minimum participant cost rate to be 48.16% through December, meeting the state's goal of 40%. Both contractors are shy of the MPCR goal cumulatively during the first 12 months of their 18-month contract. The state measures MPCR on the fiscal year beginning in July. For the first two quarters, EDSI exceeded 50%, and MAC was close at 46.29%. Both contractors had a strong MPCR in quarter one, and both dropped in quarter two. As a result, Northern Middle dropped from 54.1% to 48.16%.

Ginger informed the committee about the career service provider billing. This year's billing trend was compared to the prior two years. The new contracts started in quarter three of the prior year. After a slow start, contractor expenditures in quarter four of their contract have reached 92% compared to quarter two of the prior year with the previous contractor. Quarter two improved \$57K from quarter one of this year. She went on to say that 66% of the contract period elapsed, EDSI spent 58% of their base contract, and MAC spent 43%. These contracts aim to serve participants, so their spending should be higher and more comparable to the 66% time elapsed. MCHRA, as the One-Stop Operator, has spent 58% of their contract of the same time period. OSO expenses, while necessary, are considered overhead costs. Therefore, expenditures less than budget are positive for Northern Middle.

Ginger confirmed Marla's earlier statements regarding the contractors' quarterly and cumulative MPCR, Work Experience, and In-School Youth. The 21-22 fiscal year trend for EDSI and MAC indicates that both contractors' MPCR dropped in quarter two compared to quarter one. EDSI has met the goal for the fiscal year cumulative on the strength of quarter one. MAC is close at 46%, with quarter one being more favorable than quarter two.

Ginger stated that Northern Middle staff continues the desk reviews of EDSI and MAC monthly, analyzing contract progress and performance. Bi-weekly contractor meetings continue. Eligibility documentation has been a key monitoring focus, as is CSP staffing and the Youth challenges mentioned earlier in the presentation. Northern Middle challenged the One-Stop Operator to provide enhanced oversight of partner co-enrollments that support KPI's.

Ginger asked for approval of the 21-22 Quarter two financial report and the 21-22 revised budget of \$15.7 million (an increase of \$828K). Marla asked for \$500K from excess funding that is available to be allotted to EDSI for special populations. \$400K would go to transitioning soldiers, and \$100K be allotted for offender reentry programs. She then asked that an additional \$500K be allocated for youth through the current CSP or new RFP. Mark Peed suggested the idea of leaving the allocation of money open-ended so that it could benefit a special population, even if it means awarding the money to a different provider.

Marla explained that even though they are not satisfied with the performance of the contractors, it might be beneficial to extend their contract by six months to see if they continue to trend in the right direction. Other regions that did not switch from their previous contractor are now showing improved performance. The regions that switched because they weren't satisfied with performance now all have poor performance. The concern is that if a switch to new contractors is made, that performance may suffer through employee turnover. Mark Peed expressed that somehow the contractors need to get the message that they have to perform better.

Mark asked for a motion to approve the requests mentioned previously and also to approve the flexibility to repurpose \$500K additional DW funds for Adult, if needed. Paul Webb made the motion to approve all items as presented. Keith Carnahan seconded the motion. With no further discussion, the committee voted to approve all items as presented.

## **Adjourn**

Mark Peed adjourned the meeting.

EDSI Incentive Quarterly Benchmarks																						
Matrix:		Quarter Ending:																				
		March 31			June 30			Sept. 30			Dec. 31			March 31			June 30*			Cumulative June 30**		
		Goal	Actual*	%	Goal	Actual	%	Goal	Actual	%	Goal	Actual	%	Goal	Actual	%	Goal	Actual	%	Goal	Actual	%
Enrollments	A/DW	200	152	76%	255	303	119%	299	249	83.3%	259	245	94.6%	249	240	96.4%	249	258	103.6%	1511	1447	95.8%
	Youth	50	31	62%	62	88	142%	81	66	81.5%	71	70	98.6%	81	86	106.2%	101	86	85.1%	446	427	95.7%
Exits (50% of new enrollments)	A/DW	100	204	204%	128	99	78%	150	127	84.9%	130	88	68.0%	125	89	71.2%	125	104	83.2%	756	1010	133.6%
	Youth	25	86	344%	31	44	142%	41	32	79.0%	36	64	180.3%	41	53	129.3%	51	32	62.7%	223	410	183.9%
		Positive	Total	Percent	Positive	Total	Percent	Positive	Total	Percent	Positive	Total	Percent	Positive	Total	Percent	Positive	Total	Percent	Positive	Total	Percent
Positive Placement Rate Target 85%	A/DW	166	204	81.4%	91	99	91.9%	126	127	99%	74	88	84.1%	84	89	94.4%	50	104	48.1%	874	1,010	86.5%
	Youth	51	86	59.3%	43	44	97.7%	28	32	88%	64	64	100.0%	51	53	96.2%	21	32	65.6%	335	410	81.7%
Placement Wage	A/DW	\$ 15.00	\$ 20.83	139%	\$ 15.00	\$ 20.59	137%	\$ 15.00	\$ 22.24	148%	\$ 15.00	\$ 24.17	161.1%	\$ 15.00	\$ 21.52	143.5%	\$ 15.00	\$ 17.22	114.8%	\$ 15.00	\$ 21.10	140.7%
	Youth	\$ 10.00	\$ 14.53	145%	\$ 10.00	\$ 13.56	136%	\$ 10.00	\$ 13.89	139%	\$ 10.00	\$ 19.97	199.7%	\$ 10.00	\$ 15.34	153.4%	\$ 10.00	\$ 16.03	160.3%	\$ 10.00	\$ 15.55	155.5%
MPCR:	A/DW	50%	16.6%	33%	50%	45%	90%	50%	59.9%	120%	50%	49%	98.0%	50%	54%	108%	50%	61%	122%	50%	51%	102%
	Youth	50%	14%	28%	50%	45.5%	91%	50%	64.5%	129%	50%	44%	88.0%	50%	51%	102%	50%	49%	98%	50%	49%	98%
Work Experience	Youth	25%	0%	0%	25%	4%	16%	25%	17%	68%	25%	20%	80.0%	25%	27%	108%	25%	23%	92%	25%	18%	72%
In-School Youth Ratio	Youth	40%	1%	3%	40%	3%	8%	40%	7%	18%	40%	8%	20.0%	40%	31%	78%	40%	43%	108%	40%	20%	50%

MAC Quarterly Benchmarks																						
Matrix:		Quarter Ending:																				
		March 31			June 30			Sept. 30			Dec. 31			March 31			June 30*			Cumulative June 30**		
		Goal	Actual*	%	Goal	Actual	%	Goal	Actual	%	Goal	Actual	%	Goal	Actual	%	Goal	Actual	%	Goal	Actual	%
Enrollments	ISY	15	1	7%	50	24	48%	10	2	20.0%	10	58	580.0%	10	11	110.0%	5	7	140.0%	100	103	103.0%
	OSY	20	3	15%	30	82	273%	35	16	45.7%	25	10	40.0%	20	25	125.0%	10	6	60.0%	140	142	101.4%
	Total	35	4	11%	80	106	133%	45	18	40.0%	35	68	194.3%	30	36	120.0%	15	13	86.7%	240	245	102.1%
# of Exits (Target-50% of Enrollments)	Total	18	10	57%	40	16	40%	23	1	4.4%	18	11	62.9%	15	41	273.3%	8	43	537.5%	120	142	118.3%
Placement Rate (Target 85%)	Total	Positive	Total	Percent	Positive	Total	Percent	Positive	Total	Percent	Positive	Total	Percent	Positive	Total	Percent	Positive	Total	Percent	Positive	Total	Percent
		9	10	90%	10	16	63%	-	1	0%	11	11	100.0%	37	41	90.2%	39	43	90.7%	116	142	81.7%
Placement Wage	Total	\$ 10.00	\$ 12.20	122%	\$ 10.00	\$ 14.77	148%	\$ 10.00	\$ -	0%	\$ 10.00	\$ 19.97	199.7%	\$ 10.00	\$ 14.75	148%	\$ 10.00	\$ 14.52	145%	\$ 10.00	\$ 15.24	152.4%
MPCR:	Youth	50%	17%	34%	50%	35%	70%	50%	50%	100%	50%	44%	88.0%	50%	42%	84%	50%	49%	98%	50%	43%	86%
Work Experience	Youth	25%	9%	36%	25%	6%	24%	25%	22%	88%	25%	20%	80.0%	25%	73%	292%	25%	38%	152%	25%	36%	144%
In-School Youth Ratio	Youth	40%	4%	10%	40%	11%	28%	40%	21%	53%	40%	41%	102.5%	40%	57%	143%	40%	46%	115%	40%	39%	98%

**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**JUNE 2022 FISCAL UPDATE**  
**BUDGET/SPEND PROGRESSION**

	(\$ in 000's)						
	2021 QTR 1	2021 QTR 2	2022 QTR 3	2022 QTR 4	Expenses YTD	Revised FY 2021-22 12 Mo. Budget	% Spent
Northern Middle LWDA							
Total FY 21-22 Expense vs Mar & June Budget	2,489	2,496	2,302	3,721	11,008	15,954	69.0%

*\* Quarter 4 Spending was \$1.4M higher compared to the prior quarter.*

Three-Year Comparison	2021-22	\$ 11,008
	2020-21	\$ 13,172
	2019-20	\$ 11,887

*\* Core WIOA activities increased approx. \$1.5M in the current year, compared to the prior year.*

*\* \$13M in 2020-21 included approx. \$4M in Campbell Strong and CARES grant activities.*

# NORTHERN MIDDLE TN WORKFORCE BOARD

## JUNE 2022 FISCAL UPDATE

### 2021-22 BUDGET/SPEND PROGRESSION

	(\$ in 000's)						
	2021 QTR 1	2021 QTR 2	2022 QTR 3	2022 QTR 4	Expenses YTD	Revised FY 2021-22 12 Mo. Budget	% Spent
<b>Northern Middle LWDA</b>							
Infrastructure Funding Agreement	0	194	192	345	731	1,000	73.1%
Adult (\$100,000 re-purposed for Admin)	873	383	323	1,311	2,889	3,121	92.6%
Dislocated Worker (\$2,000,000 for Adult *)	563	1,095	957	746	3,361	5,174	65.0%
Youth	516	620	655	793	2,585	3,025	85.5%
RESEA	58	67	56	64	245	309	79.4%
Campbell Strong (closed 9/30)	198	0	0	0	198	278	71.1%
National Dislocated Worker (COVID)	147	80	40	24	290	1,316	22.0%
National Dislocated Worker (Flood)		58	71	76	205	550	37.2%
Summer Youth Initiative (closed 8/31)	95	0	0	0	95	95	100.2%
Rural Development	39	0	0	0	39	52	74.5%
<b>September Total FY 21-22 Expense vs Budget</b>	<b>2,489</b>	<b>2,496</b>	<b>2,295</b>	<b>3,358</b>	<b>10,638</b>	<b>14,919</b>	<b>71.3%</b>
Additional Dislocated Worker (F21 & P22)					0	754	0.0%
Apprenticeship			7	161	168	168	100.0%
Expired Funding Rural Development					0	-13	0.0%
Expired Funding Campbell Strong					0	-80	0.0%
<b>December Total FY 21-22 Expense vs Budget</b>	<b>2,489</b>	<b>2,496</b>	<b>2,302</b>	<b>3,519</b>	<b>10,806</b>	<b>15,747</b>	<b>68.6%</b>
Additional Apprenticeship				61	61	61	100.0%
Layoff Aversion				60	60	60	100.0%
Re-Entry				31	31	35	87.8%
Career Exploration				49	49	50	98.9%
<b>Total FY 21-22 Expense vs Mar &amp; June Budget</b>	<b>2,489</b>	<b>2,496</b>	<b>2,302</b>	<b>3,721</b>	<b>11,008</b>	<b>15,954</b>	<b>69.0%</b>

\* Board and State approved re-purpose up to \$2,000,000 of Dislocated Worker program budget to Adult  
\$1,500,000 was used through June 30, 2022; \$500,000 remains for Q1 22-23 use.

**Proposed - Request an additional \$500,000 for 2022-23**

# NORTHERN MIDDLE TN WORKFORCE BOARD

## JUNE 2022 FISCAL UPDATE

### UTILIZATION OF EXPIRING GRANTS

	Grant Term	Contract	% Utilized	\$ Expired
Adult	24 Mos	1,965,413.41	100%	-
Dislocated Worker	24 Mos	3,257,075.61	100%	-
Youth	27 Mos	2,070,051.09	100%	-
RESEA	12 Mos	308,880.00	80%	62,278.29
Layoff Aversion	6 Mos	60,327.75	100%	-
Re-Entry	5 Mos	35,641.00	86%	4,924.07
Career Exploration	2 Mos	50,000.00	99%	542.40
Statewide Apprenticeship	9 Mos	229,000.00	100%	-
		<u>7,976,388.86</u>	<u>99%</u>	<u>67,744.76</u>

	Grant Term	Contract	% Utilized	Extending
National Emergency DW - COVID-19	24 Mos	2,841,222.29	64%	1,025,739.69

# NORTHERN MIDDLE TN WORKFORCE BOARD

## JUNE 2022 FISCAL UPDATE

### MPCR

TDLWD Minimum Participant Cost Rate (MPCR) - Preliminary Through June 2022

**MPCR = 49.68%**

	MAC Youth	EDSI Youth and Summer Youth	EDSI Adult & Dislocated Worker	Campbell Strong excluded	Disaster Relief	CARES, Apprentice, Incumb Wkr	Other (NM, & IFA)	Total
Qualifying Expenses	\$ 269,898	\$ 811,120	\$ 2,710,094	\$ 790	\$ 374,247		\$ 83,351	\$ 4,249,499
Total Program	\$ 588,384	\$ 1,550,255	\$ 4,799,294	\$ 171,107	\$ 399,446	\$ 82,151	\$ 962,377	\$ 8,553,014
MPCR	45.87%	52.32%	56.47%	0.46%	93.69%	0.00%	8.66%	49.68%

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

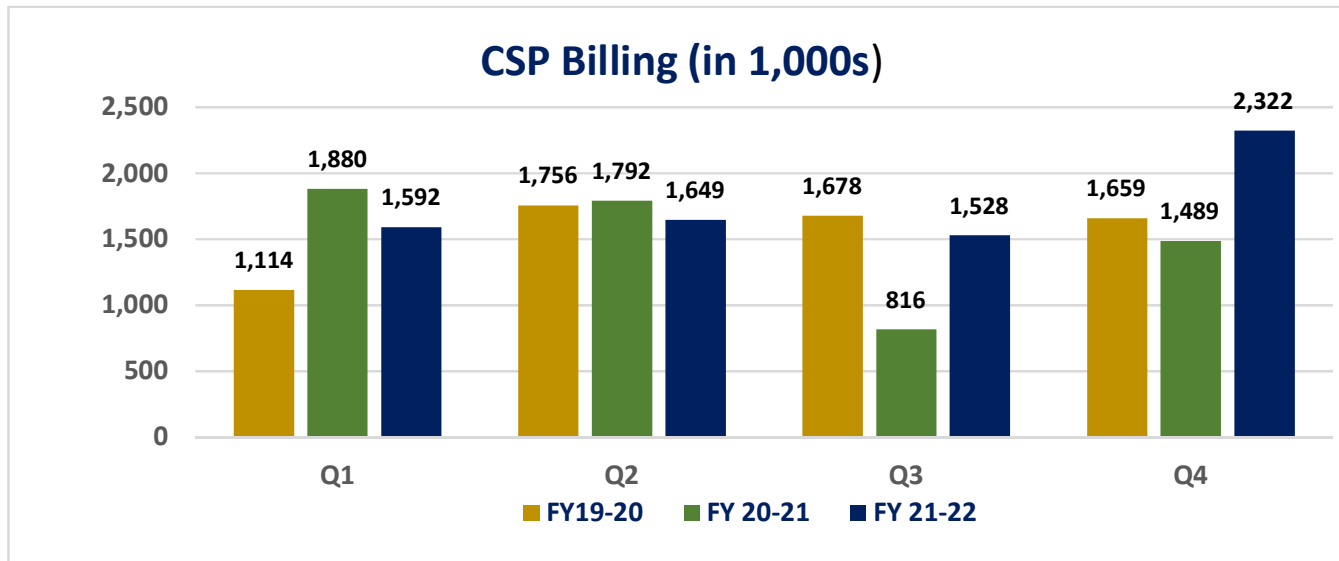
**Note: National DW (Disaster Relief) is now included.**

**\*\*\* PRIOR QUARTER MPCR = 47.38%\*\*\***

# NORTHERN MIDDLE TN WORKFORCE BOARD

## JUNE 2022 FISCAL UPDATE

### CAREER SERVICE PROVIDER - BILLING TREND



*Q4 was the highest quarter of CSP billing the in past three years, up \$794k compared to the prior quarter.*

Career Service Provider Billing	Q1	Q2	Q3	Q4	Total
CSP Billing FYE 6/30/20 MCHRA	1,114	1,756	1,678	1,659	6,207
CSP Billing FYE 6/30/21 MCHRA/EDSI & MAC	1,880	1,792	816	1,489	5,977
CSP Billing FYE 6/30/22 EDSI & MAC	1,592	1,649	1,528	2,322	7,091

**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**JUNE 2022 FISCAL UPDATE**  
**CONTRACTOR - BILLING PROGRESS**

	In \$000's				
Career Service Provider Billing	Cumulative through Mar	Total Spent Qtr Ended June 2022	Budget Spent Contract To Date	Total 18 Month Base Contract Budget	% Spent - 100% time elapsed (contract extended)
<b>EDSI (18 Month Comparison)</b>	\$ 6,372	\$ 2,132	\$ 8,504	\$ 9,716	<b>88%</b>
<b>MAC (18 Month Comparison)</b>	\$ 507	\$ 190	\$ 697	\$ 800	<b>87%</b>
Contract-to-Date through Q4 2021-22	\$ 6,879	\$ 2,322	\$ 9,201		

	In \$000's				
One-Stop Operator Billing	Cumulative through Mar	Total Spent Qtr Ended June 2022	Budget Spent Contract To Date	Total 18 Month Budget	% Spent - 100% time elapsed (contract extended)
<b>MCHRA - (18 Month Comparison)</b>	\$ 318	\$ 60	\$ 378	\$ 447	<b>85%</b>

**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**JUNE 2022 FISCAL UPDATE**  
**EDSI - MPCR TREND**  
**CONTRACT-TO-DATE & QUARTERLY - 18 Months**

	MPCR - Goal 50%			MPCR Adult/DW - Goal 50%		
EDSI	Youth			A/DW Combined		
CTD CUMULATIVE	Direct \$ '000	Total \$ '000	49%	Direct \$ '000	Total \$ '000	51%
Total	974	1,979	49%	3,246	6,305	51%

	MPCR - Goal 50%			MPCR Adult/DW - Goal 50%		
EDSI	Youth			A/DW Combined		
QTR Ended 3/31/21	15	103	14%	84	508	17%
QTR Ended 6/30/21	148	326	45%	452	997	45%
FYE 6/30/21 (6 Mos)	163	429	38%	536	1,506	36%

	MPCR - Goal 50%			MPCR Adult/DW - Goal 50%		
EDSI	Youth			A/DW Combined		
QTR Ended 9/30/21	246	381	64%	652	1,089	60%
QTR Ended 12/31/21	148	338	44%	547	1,119	49%
QTR Ended 3/31/22	186	362	51%	521	974	54%
QTR Ended 6/30/22	232	470	49%	989	1,617	61%
FYE 6/30/22	811	1,550	52%	2,710	4,799	56%

**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**JUNE 2022 FISCAL UPDATE**  
**MAC YOUTH - MPCR TREND**  
**CONTRACT-TO-DATE & QUARTERLY - 18 Months**

	MPCR - Goal 50%		
MAC	Youth		
CTD CUMULATIVE	Direct \$ '000	Total \$ '000	43%
Total	301	698	43%

	MPCR - Goal 50%		
MAC	Youth		
QTR Ended 3/31/21	7	43	17%
QTR Ended 6/30/21	23	66	35%
FYE 6/30/21 (6 Mos)	31	109	28%

	MPCR - Goal 50%		
MAC	Youth		
QTR Ended 9/30/21	42	85	50%
QTR Ended 12/31/21	66	150	44%
QTR Ended 3/31/22	69	164	42%
QTR Ended 6/30/22	93	190	49%
FYE 6/30/22	270	588	46%

**NORTHERN MIDDLE TN WORKFORCE BOARD**  
**JUNE 2022 FISCAL UPDATE**  
**EDSI YOUTH - WORK EXPERIENCE/IN-SCHOOL**  
**CONTRACT-TO-DATE & QUARTERLY 18 Months**

	Work Experience - Goal 25%		
EDSI	Youth		
CTD CUMULATIVE	Wk Exp \$ '000	Total \$ '000	18%
Total	333	1,836	18%

ISY/Youth - Goal 40%		
Youth		
ISY \$ '000	Total \$ '000	20%
369	1,836	20%

	Work Experience - Goal 25%		
EDSI	Youth		
QTR Ended 3/31/21	0	103	0%
QTR Ended 6/30/21	10	270	4%
FYE 6/30/21 (6 Mos)	10	374	3%

ISY/Youth - Goal 40%		
Youth		
1	103	1%
7	270	3%
8	374	2%

	Work Experience - Goal 25%		
EDSI	Youth		
QTR Ended 9/30/21	48	293	17%
QTR Ended 12/31/21	69	338	20%
QTR Ended 3/31/22	98	362	27%
QTR Ended 6/30/22	109	470	23%
FYE 6/30/22	323	1,462	22%

ISY/Youth - Goal 40%		
Youth		
20	293	7%
27	338	8%
114	362	31%
200	470	43%
361	1,462	25%

# NORTHERN MIDDLE TN WORKFORCE BOARD

## JUNE 2022 FISCAL UPDATE

### MAC YOUTH - WORK EXPERIENCE/IN SCHOOL CONTRACT-TO-DATE & QUARTERLY - 18 Months

	Work Experience - Goal 25%			ISY/Youth - Goal 40%		
MAC	Youth			Youth		
CTD CUMULATIVE	Wk Exp \$ '000	Total \$ '000	36%	ISY \$ '000	Total \$ '000	39%
Total	249	698	36%	269	698	39%
	Work Experience - Goal 25%			ISY/Youth - Goal 40%		
MAC	Youth			Youth		
QTR Ended 3/31/21	4	43	9%	2	43	4%
QTR Ended 6/30/21	4	66	6%	7	66	11%
FYE 6/30/21 (6 Mos)	8	109	7%	9	109	8%
	Work Experience - Goal 25%			ISY/Youth - Goal 40%		
MAC	Youth			Youth		
QTR Ended 9/30/21	19	85	22%	18	85	21%
QTR Ended 12/31/21	29	150	20%	62	150	41%
QTR Ended 3/31/22	120	164	73%	93	164	57%
QTR Ended 6/30/22	73	190	38%	88	190	46%
FYE 6/30/22	241	588	41%	260	588	44%

# NORTHERN MIDDLE TN WORKFORCE BOARD

## JUNE 2022 FISCAL UPDATE

### FY2022-23 REVISED BUDGET REVENUES

Grant Revenue	\$ in millions	\$
Carryover from 21-22	5.3	5,336,420.55
22-23 Allocations	9.4	9,407,167.00
Total Adult, DW, Youth	14.7	14,743,587.55
Carryover to 22-23 for Youth	(2.7)	(2,748,727.80)
Carryover to 22-23 at 20% of Adult, DW	(1.2)	(1,270,605.00)
Total 22-23 Adult, DW, Youth	10.8	10,724,254.8
National Emergency DW (COVID)	1.0	1,025,739.69
National Emergency DW (Flood)	0.3	345,265.78
RESEA	0.2	200,000.00
IFA	1.0	1,000,000.00
Total 22-23 Projected Grant Revenue	13.3	13,295,260.22

# NORTHERN MIDDLE TN WORKFORCE BOARD

## JUNE 2022 FISCAL UPDATE

### FY2022-23 REVISED BUDGET EXPENSES

Projected Expenses	\$ in millions	%	
NM Workforce Board	1.4	11%	1,365,645.00
Board Incumbent Worker Program	0.3	2%	300,000.00
Other Board Pilot Programs and Initiatives	0.3	2%	300,000.00
Recruitment Campaign	0.1	1%	100,000.00
IFA (non-Title I)	1.0	8%	1,000,000.00
<b>Total Board and Overhead</b>	<b>3.1</b>	<b>23%</b>	<b>3,065,645.00</b>
National Emergency DW (Covid) Non-pass through	0.1		74,824.16
National Emergency DW (Flood)	0.3	2%	345,265.78
One Stop Operator	0.3	2%	319,837.62
Career Service Providers	8.4	63%	8,338,772.13
Career Service Provider (EDSI) Nat'l Emergency DW (COVID)	1.0	8%	950,915.53
RESEA	0.2	2%	200,000.00
<b>Total Contracted Grant Services</b>	<b>10.2</b>	<b>77%</b>	<b>10,229,615.22</b>
<b>Total 22-23 Grant Expense</b>	<b>13.3</b>	<b>100%</b>	<b>13,295,260.22</b>

# **NORTHERN MIDDLE TN WORKFORCE BOARD**

## **JUNE 2022 FISCAL UPDATE**

### **MONITORING UPDATE**

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

- \* **AREA OF CONCERN** - CSP staffing with EDSI continues to churn. EDSI provides status updates at each contractor meeting.
- \* **Monthly desk review of invoices** is performed analyzing contract progress and performance.
- \* **Biweekly contractor meetings** continue.
- \* **Northern Middle program staff** conducted reviews of EDSI and MAC direct participant expenditures.
- \* **Northern Middle program staff** conducted a desktop review of EDSI enrollments.
- \* **Northern Middle program and fiscal staff** provided technical assistance to EDSI and MAC as needed.

#### **New Youth Providers - Monroe Harding, Jobs for TN Graduates, Amelia's Closet/Liberty Station**

- \* **Northern Middle fiscal and program staff** conducted WIOA Youth training to the 3 new Youth providers.

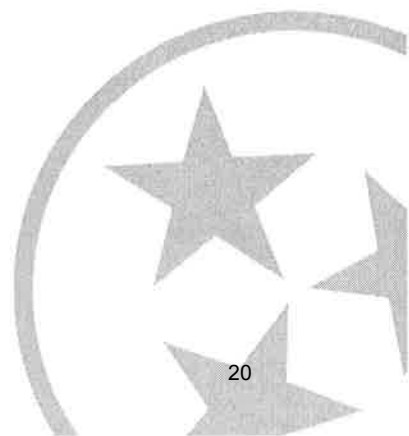
#### **Mid-Cumberland HRA - One-Stop Operator**

- \* **The One-Stop Operator** continues to promote enhanced oversight of partner accountability in supporting KPI goals.

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

- \* **TDLWD's Performance Accountability Review (PAR)** on-site monitoring; Report issued - No Findings.
- \* **TDLWD's Program Integrity Unit** conducted virtual monitoring; Report issued - No Findings; a Few Observations and Several Best Practices Noted. (Observation - Update and Clarify Fiscal Record Retention Policy)
- \* **TN Comptroller's Office** currently conducting Single Audit procedures.

# **Northern Middle Local Workforce Development Area**





May 31, 2022

The Honorable Anthony Holt  
Mayor of Sumner County  
Northern Middle Local Workforce Development Board, CLEO  
355 North Belvedere Dr., Room 102  
Gallatin, Tennessee 37066

Marla W. Rye, Executive Director  
Northern Middle Local Workforce Development Board  
Workforce Essentials, Inc., President  
523 Madison Street, Suite A  
Clarksville, TN 37040

Dear Mayor Holt and Ms. Rye,

Program Accountability Review (PAR) has completed its monitoring of Northern Middle Local Workforce Development Area, which included activities by board staff, fiscal agent, one-stop operator, and career service provider. The Tennessee Department of Labor and Workforce Development (TDLWD) has grant agreements with Northern Middle TN Local Workforce Dev Board, Inc. The monitored grants are listed at the end of the monitoring report. A copy of the monitoring report is attached.

Sincerely,

A handwritten signature in blue ink that reads 'Christopher A. Risher'.

Christopher Risher  
Director of Internal Audit

cc: Dr. Jeff McCord, Commissioner TDLWD  
Deniece Thomas, TDLWD  
Steve Playl, TDLWD  
James Roberson, TDLWD  
Jaylene Younge, TDLWD  
Ivan Greenfield, TDLWD  
Jonathan Haynes, TDLWD  
Justin Attkisson, TDLWD  
John Alexander, TDLWD  
John Zobl, LWDB Chair  
Comptroller of the Treasury, State of Tennessee

# Executive Summary

On May 25, 2022, staff from the Tennessee Department of Labor and Workforce Development (TDLWD), Office of Program Accountability Review (PAR), completed an on-site review of Northern Middle Local Workforce Development Area, which included activities by board staff, fiscal agent, one-stop operator, and career service provider. The Tennessee Department of Labor and Workforce Development (TDLWD) has grant agreements with Northern Middle TN Local Workforce Dev Board, Inc. Refer to the end of the report for a listing of the monitored grants.

## ***Disclaimer***

This report does not contain the results of participant program monitoring, including reviewing participant files for eligibility documentation and case management. These files were reviewed by staff in the Workforce Services Division and they will separately report their results. PAR did not review the participant files and, accordingly, does not express an opinion or any assurance regarding the participant eligibility documentation or case management.

## ***Key Findings***

- No findings were reported.

# Northern Middle Local Workforce Development Area

## ***Introduction***

On May 25, 2022, staff from PAR completed an on-site monitoring visit of Northern Middle Local Workforce Development Area, which included activities by board staff, fiscal agent, one-stop operator, and career service provider. The Tennessee Department of Labor and Workforce Development (TDLWD) has grant agreements with Northern Middle TN Local Workforce Dev Board, Inc. Monitoring included a review of the grants with TDLWD. Refer to the end of the report for a listing of the monitored grants.

PAR conducted the monitoring review in accordance with the Department of General Services, Central Procurement Office, *Policy 2013-007, Grant Management and Subrecipient Monitoring Policy and Procedures*, Amended February 15, 2018.

Monitoring objectives were to:

- assess the reliability of internal controls,
- verify that program objectives are being met,
- verify that civil rights requirements are being met,
- test the reliability of the financial and programmatic reporting,
- test if costs and services are allowable and eligible, and
- verify grant compliance.

A monitoring review is substantially less in scope than an audit. PAR did not audit the financial statements and, accordingly, does not express an opinion or any assurance regarding the financial statements of Northern Middle TN Local Workforce Dev Board, Inc. Also, this report does not contain the results of participant program monitoring, including reviewing participant files for eligibility documentation and case management. These files were reviewed by staff in the Workforce Services Division and they will separately report their results. PAR did not review the participant files and, accordingly, does not express an opinion or any assurance regarding the participant eligibility documentation or case management.

## ***Were any issues noted during the on-site review?***

No findings were noted.

### ***Which grants were monitored?***

<b>Service Provided</b>	<b>Grant Number</b>	<b>Grant Period</b>	<b>Grant Max. Liability</b>
Adult	LWNMP191ADULT20	07/01/19-06/30/21	\$348,584.54
Adult	LWNMF201ADULT20	10/01/19-06/30/21	\$1,858,337.50
Adult	LWNMP201ADULT21	07/01/20-06/30/22	\$328,113.38
Adult	LWNMF211ADULT21	10/01/20-06/30/22	\$1,637,300.03
Adult	LWNMP211ADULT22	07/01/21-06/30/23	\$490,252.09
Adult	LWNMF221ADULT22	10/01/21-06/30/23	\$2,310,613.86
Dislocated Worker	LWNMP191DSLWK20	07/01/19-06/30/21	\$592,840.29
Dislocated Worker	LWNMF201DSLWK20	10/01/19-06/30/21	\$2,822,451.01
Dislocated Worker	LWNMP201DSLWK21	07/01/20-06/30/22	\$591,508.13
Dislocated Worker	LWNMF211DSLWK21	10/01/20-06/30/22	\$2,665,567.48
Dislocated Worker	*LWNMP211DSLWK22	07/01/21-06/30/23	\$546,521.25
Dislocated Worker	*LWNMF221DSLWK22	10/01/21-06/30/23	\$2,906,835.00
Youth	LWNMP191YOUTH20	04/01/19-06/30/21	\$2,351,514.97
Youth	LWNMP201YOUTH21	04/01/20-06/30/22	\$2,070,051.09
Youth	LWNMP211YOUTH22	04/01/21-06/30/23	\$2,935,628.33
National Dislocated Worker Grant	LWNMF201DRDWG20	07/01/20-06/30/22	\$1,148,265.93
National Dislocated Worker Grant	LWNMF205DRDWG20	11/01/20-06/30/22	\$1,652,956.36
National Dislocated Worker Grant	LWNMF211DRDWG21	08/21/21-08/20/23	\$550,085.00
Statewide Activities	LWNMP182MNSWA19	03/02/20-06/30/21	\$1,400.00
Statewide Activities	LWNMP181CESWA19	03/02/20-06/30/21	\$26,600.00
Statewide Activities	**LWNMP183MNSWA19	03/02/20-06/30/21	\$2,151.00
Statewide Activities	LWNMP91MNSWA20	10/01/19-09/30/21	\$5,219.34
Statewide Activities	LWNMP191RDSWA20	10/01/19-09/30/21	\$46,974.10
Statewide Activities	LWNMP182WBSWA19	05/03/21-06/30/21	\$152,896.00

<b>Service Provided</b>	<b>Grant Number</b>	<b>Grant Period</b>	<b>Grant Max. Liability</b>
Statewide Activities	LWNMP192MNSWA20	05/03/21-06/30/21	\$16,988.00
Statewide Activities	LWNMP201WBSWA21	05/17/21-08/31/21	\$509,652.00
Statewide Activities	LWNMP201MNSWA21	02/01/21-06/30/21	\$21,000.00
Statewide Activities	**LWNMP181WBSWA19	03/02/20 -06/30/21	\$43,020.00
Re-employment Services & Eligibility Assessment	LWNMF191RESEA19	10/01/19-06/30/21	\$285,686.67
Re-employment Services & Eligibility Assessment	LWNMF201RESEA20	07/01/21-12/31/21	\$308,880.00
Coronavirus Aid, Relief and Economic Security Act	LWNMF211CBCRF21	03/01/20-04/30/21	\$370,000.00
Coronavirus Aid, Relief and Economic Security Act	LWNMF211RSCRF21	03/01/20-04/30/21	\$248,800.00
Coronavirus Aid, Relief and Economic Security Act	LWNMF211IWCRF21	03/29/21-05/28/21	\$415,206.00
Apprenticeship	LWNMP191NATAP20	09/15/19-06/30/21	\$55,555.00
National Dislocated Worker Grant	LWNMF191TEDWG19	10/01/18-09/30/21	\$3,100,019.00
National Dislocated Worker Grant	LWNMF192TEDWG19	10/01/18-09/30/21	\$4,650,029.00
Statewide Activities	*LWNMF221APSWA22	10/01/21-06/30/22	\$229,000.00
Infrastructure Funding Agreement	LWNMP211ESIFA22	07/01/21-06/30/22	\$597,514.09

**Figure 1.** Listing of monitored grants.

\*No expenditures charged to the grant as of the monitoring date.

\*\*Grant closed with no expenditures.

# Northern Middle LWDB





July 25, 2022

John Zobl, Board Chair  
Northern Middle TN Local Workforce Board  
523 Madison Street  
Clarksville, TN 37040

Dear Mr. Zobl,

The Program Integrity Unit has completed its monitoring review of NMLWDB for the Tennessee Department of Labor. We gathered the responses that were provided and compiled a brief monitoring report for your review that is attached to this letter.

Sincerely,

A handwritten signature in cursive script that reads "Justin Attkisson".

Justin Attkisson  
Program Integrity Director

cc: Carrie Landenberger  
Rachel Rogers  
Chassity Scott  
Brian Hill  
Bob Rial - CLEO  
Marla Rye - Executive Director

# Executive Summary

## ***Introduction***

On July 12-13, 2022, staff from Program Integrity completed a virtual monitoring visit with Northern Middle Local Workforce Development Board (NMLWDB). Program Integrity conducted the monitoring review in accordance with the Federal Core Monitoring Guide focusing on objectives Service Design & Delivery and Grant Operations.

Program Integrity monitoring team was tasked with:

- examining NMLWDB policies, procedures, and supporting documents
- searching for inconsistencies, irregularities, and concerns
- identifying observed and potential best practices
- compiling any additional questions for the LWDB
- meeting with Subject Matter Experts (SMEs) to provide guidance on LWDB responses

## ***Disclaimer***

A monitoring review is substantially less in scope than an audit. Program Integrity did not audit the financial statements and, accordingly, does not express an opinion or any assurance regarding the financial statements of NMLWDB. Also, this report does not contain the results of participant program monitoring, including reviewing participant files for eligibility documentation and case management. These files will be reviewed by Program Integrity at a later date. We will separately report their results. Program Integrity did not review participant files and, accordingly, does not express an opinion or any assurance regarding the participant eligibility documentation or case management at this time.

## ***Key observations/concerns/recommendations***

- Going forward NMLWDB needs an idle facility/capacity policy or procedure in place.
- Going forward NMLWDB needs an intangible property policy or procedure in place.
- Dashboards on the NMLWDB website have not been updated since 2020.
- When a Federal reference is used, it is recommended to update policies using [eCFR.gov](https://www.ecfr.gov) to provide the most up to date citation number. For example, the Federal citations on the Record Retention Policy are off by one number.
- NM policies cite Federal references, however there are times when the State policy is stricter or has additional requirements than the Federal citation. An example would be the Record Retention Policy. The Federal requirement is 3 years and the [State Policy](#) requirement is 5 years. While NM follows the 5-year rule in practice, we recommend NM amend local policies to refer to State policy when there is a difference in Federal and State. Defining the practice in the policy (for example "5 years") would be best.

## ***Key findings***

- No findings were noted

### ***Observed or Potential Best Practices***

1. Hired an outside consultant to lead the strategic planning session which allowed the board to be the leaders instead of the ED.
2. Innovative service system
  - a. Local jails, Nashville State CC and employers to deliver IRT (Industrial Readiness Training)
  - b. Women's Prison, Persevere and employers to deliver software development software
3. Apprenticeship program to become a Workforce Services Professional with a career path tied to future earnings.
4. NM dedicated \$100k of funds for recruitment and outreach. NM recognizes the importance of marketing and conducting additional marketing options.
5. NHC partnered with Murfreesboro AJC to recruit individual for CNA training. The board partnered with Red Cross who designed a CNA training plan that included online academic curriculum.
6. By maximizing the number of partners co-located at the AJC, NM minimizes the AJC operating costs per partner, participant access to partners is improved, improving communication with partners and keeping more AJCs open.
7. NM provides CSP training materials online.
8. NM contracted with 3 new Youth providers who target special populations; foster care/transitioning, justice involved/transitioning and disabilities.
9. NM provided a series of professional development workshops for TennCare managed care partners that were having difficulty finding direct support including a panel discussion with partners to show how they can help them find employees. This reached employers statewide.
10. NM started a teacher registered apprenticeship program with a teacher recruitment tool that will probably go statewide.
11. The board has focused on the ETPL and narrowed down the ETPL to programs that are performing and have certifications.
12. Utilizing COVID funds
  - a. NM applied for additional funding during COVID to provide businesses with funding to adapt and continue working.
  - b. NM also used COVID funds to purchase 750 laptops for job seekers and AE students to continue remotely during COVID.
13. Focus board improvement
  - a. NM brought in a national corporation and did a think tank with mayors on how to become a better board.
  - b. NM is open to looking on national level (outside of TN) for Best Practices and belong to National Association of Workforce Boards. NM brings board members to national meetings like SETA (Southeast Trending Association).
14. A centralized spreadsheet is maintained to track referrals within and outside of the AJC.
15. Quarterly eligibility training especially for the Youth program.

16. NM set up as series of specialized assessments, referral forms, eligibility forms for Fort Campbell. Can be used for other specialized centers.
17. NM utilizes TAA's paperwork instead of requiring the participant to fill out separate paperwork with Title I because 100% of TAA participants are required to be enrolled in Title I.
18. CSP is transitioning to the use of a loadable debit card for the participant and the CSP a company credit card to assist with online exams, etc.
19. CSP is going into the high schools and offering mock interviews, resume writing, etc.
20. NM has an internal help desk that includes a work order tracking system that is utilized by AJC staff.
21. Innovation of ESL
  - a. NM works with internal resources to assist with translation of documents. If more support is needed, NM utilizes their English as a Second Language (ESL) partners in AE.
  - b. NM also works with a lot of employers to provide ESL classes.

### ***NM requests further guidance***

- NM requested Best Practices from other areas to guide hiring events (on-site and virtual) for future use.
- NM requested a Best Practice for tracking engagement with business customers. Board would like to improve internal communication.

### ***Concerns presented by NM***

- Documents needed for data validation are not accessible for incarcerated reentry participants and homeless youth participants.
- Benefits cliff for working poor.
- Federal Performance Standards are a barrier to serve individuals. Measurable skills gains, depending on date of enrollment, and may require enrollment delay. Must change service strategy to meet performance standards.
- Need statewide marketing campaign that provides structure that can be tailored to region. Need more visibility of AJCs. AJCs get bad reputation because of UI and Title I gets lumped in with UI.
- Title I is the only one accountable for outcomes. Title I co-enrolls with TAA and SNAP E&T, but if the participant drops out, there are not penalties for either program, only Title I.
- Equipment tracking and disposition requirements vary greatly between State programs. Workforce Essentials is also the contractor for AE. Title I equipment tracking disposition requirements are very complicated unlike AE. For Title I, for anything over \$100, like an office chair, it must be tracked from purchase to disposition, which is difficult. For AE, a list of items can be donated to a nonprofit after notifying the State.
- Issue with SmartSimple regarding billing. It has fallen behind because of the partner changes each quarter. Partners will receive additional expenses

- In Grants4TN the reimbursement request signed by the ED. However, SmartSimple just has a box that is checked to authorize the claim for reimbursement (not by ED) and does not request a signature from the ED.
- While VOS was down for a week, enrollments and case management was a challenge. CSP was forced to quickly revert back to paper. VOS needs a back-up system for access.

## ***Conclusion***

We concluded our monitoring review of the NMLWDB and gathered many best practices with no findings. If NMLWDB needs technical assistance for idle facilities and/or intangible properties, Program Integrity will be available for guidance. We will provide any Best Practices concerning on-site/virtual hiring events and tracking engagement with business customers.



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**Record Retention and Access**  
**Proposed Effective Date: August 10, 2022**

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**Summary of Proposed Changes**

- 1. Updated citations from Uniform Guidance which were re-numbered.**
- 2. Moved descriptive wording per Uniform Guidance from the Policy section to the Background section.**
- 3. Clarified policy wording to reflect Northern Middle's practice of following more stringent requirements of Tennessee Department of Labor and Workforce Development.**
- 4. Added reference to NMTWB's Electronic Case Files policy.**

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**Record Retention and Access**  
**Effective Date: August 10, 2022**

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**Purpose:**

This policy provides overarching guidelines related to record retention and access to records for the Northern Middle TN Workforce Board (NMTWB).

**Background:**

Uniform Guidance at 2 CFR 200.302 states that the financial management system of each non-Federal entity must provide for the following:

- Retention requirements for records – 2 CFR 200.334  
Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award.
- Requests for transfer of records – 2 CFR 200.335
- Methods for collection, transmission and storage of information – 2 CFR 200.336  
Records will be sufficient to provide periodic quality control reviews, provide reasonable safeguards against alteration, and remain readable.
- Access to records – 2 CFR 200.337  
The Federal awarding agency, Inspectors General, the Comptroller General of the United States, the pass-through entity, or any of their authorized representatives will have the right of access to any documents, papers, or other records pertinent to the federal award, in order to make audits, examinations, excerpts, and transcripts. This right also includes timely and reasonable access to personnel for the purpose of interview and discussion related to such documents. Only under extraordinary and rare circumstances would such access include review of the true name of victims of a crime. Rights of access are not limited to the required retention period but last as long as the records are retained.
- Restrictions on public access to records – 2 CFR 200.338  
Restrictions to public access to the records of NMTWB pertinent to a Federal award will not be limited, except for protected personally identifiable information or other confidentiality exceptions or exemptions.

**Resources:**

2 CFR 200.302; 2 CFR 200.334-338

**Policy:**

Northern Middle TN Workforce Board will abide by record retention and access requirements of Uniform Guidance and will also abide by any additional requirements, terms or conditions of the Tennessee Department of Labor and Workforce Development

(TDLWD). Where requirements differ, records will be retained under the requirements which are most stringent. See also, TDLWD and NMTWB's Electronic Case Files policies.

#### Sub-Recipient record retention and access

It is the intent of Northern Middle TN Workforce Board that sub-recipients

- a. Meet record retention and access requirements stated at 2 CFR 200.334-338 and any additional requirements, terms and conditions of the Tennessee Department of Labor and Workforce Development (TDLWD),
- b. Are aware of the record retention requirements, and
- c. Attest to compliance with these requirements.

Where federal and state requirements differ, records will be retained under the guidance which is most stringent. See also, TDLWD and NMTWB's Electronic Case Files policies.

#### Contact:

For any questions related to this policy please contact Ginger Fussell, Fiscal Director at [gfussell@workforceessentials.com](mailto:gfussell@workforceessentials.com).

**Effective Date: January 1, 2018**

**Updated: July 1, 2019; June 1, 2020, August 10, 2022**

**Duration: Indefinite**

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Marla Rye, Executive Director  
Northern Middle TN LWDB



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## Record Retention and Access

Effective Date: ~~January 1, 2018~~ August 10, 2022

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### Purpose:

This policy provides overarching guidelines related to record retention and access to records for the Northern Middle TN Workforce Board (NMTWB).

### Background:

Uniform Guidance at 2 CFR 200.302 states that the financial management system of each non-Federal entity must provide for the following:

- Retention requirements for records – 2 CFR 200.334
  - Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award.
- Requests for transfer of records – 2 CFR 200.335
- Methods for collection, transmission and storage of information – 2 CFR 200.336
  - Records will be sufficient to provide periodic quality control reviews, provide reasonable safeguards against alteration, and remain readable.
- Access to records – 2 CFR 200.337
  - The Federal awarding agency, Inspectors General, the Comptroller General of the United States, the pass-through entity, or any of their authorized representatives will have the right of access to any documents, papers, or other records pertinent to the federal award, in order to make audits, examinations, excerpts, and transcripts. This right also includes timely and reasonable access to personnel for the purpose of interview and discussion related to such documents. Only under extraordinary and rare circumstances would such access include review of the true name of victims of a crime. Rights of access are not limited to the required retention period but last as long as the records are retained.
- Restrictions on public access to records – 2 CFR 200.338
  - Restrictions to public access to the records of NMTWB pertinent to a Federal award will not be limited, except for protected personally identifiable information or other confidentiality exceptions or exemptions.

### Resources:

2 CFR 200.302; 2 CFR 200.33~~34~~-33~~78~~

### Policy:

Northern Middle TN Workforce Board will abide by record retention and access



requirements of Uniform Guidance and will also abide by any additional requirements, terms or conditions of the Tennessee Department of Labor and Workforce Development (TDLWD), as well as the following: Where requirements differ, records will be retained under the requirements which are most stringent. See also, TDLWD and NMTWB's Electronic Case Files policies.

**A. Retention requirements for records**

~~Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award will be retained in accordance with federal Uniform Guidance 2 CFR 200.333.~~

**B. Requests for transfer of records**

~~Requests for transfer and custody of records will be conducted in accordance with Uniform Guidance 2 CFR 200.334.~~

**C. Methods for collection, transmission and storage of information**

~~Methods for collection, transmission and storage of information will meet requirements specified at 2 CFR 200.335, and will be sufficient to provide periodic quality control reviews, provide reasonable safeguards against alteration, and remain readable.~~

**D. Access to records**

~~Pursuant to 2 CFR 200.336, the Federal awarding agency, Inspectors General, the Comptroller General of the United States, the pass-through entity, or any of their authorized representatives will have the right of access to any documents, papers, or other records pertinent to the federal award, in order to make audits, examinations, excerpts, and transcripts. This right also includes timely and reasonable access to personnel for the purpose of interview and discussion related to such documents. Only under extraordinary and rare circumstances would such access include review of the true name of victims of a crime. Should such a situation occur, access will only be granted in accordance with 2 CFR 200.336. Expiration of the right of access to records will follow provisions of 2 CFR 200.336.~~

**E. Restrictions on public access to records**

~~Restrictions to public access to the records of NMTWB pertinent to a Federal award will not be limited, except for protected personally identifiable information or other confidentiality exceptions or exemptions stated in 2 CFR 200.337.~~

**F. Sub-Recipient record retention and access**

It is the intent of Northern Middle TN Workforce Board that sub-recipients -

a. meet record retention and access requirements stated at 2 CFR 200.333-337 and any additional requirements, terms and conditions of the Tennessee Department of Labor and Workforce Development (TDLWD),

b. that sub-recipients are aware of the record retention requirements, and

c. attest to compliance with these requirements.



Where federal and state requirements differ, records will be retained under the guidance which is most stringent. See also, TDLWD and NMTWB's Electronic Case Files policies.

**Contact:**

For any questions related to this policy please contact Ginger Fussell, Fiscal Director at [gfussell@workforceessentials.com](mailto:gfussell@workforceessentials.com).

**Effective Date: January 1, 2018**

**Updated: July 1, 2019; June 1, 2020, August 10, 2022**

**Duration: Indefinite**

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Marla Rye, Executive Director  
Northern Middle TN LWDB

# **NORTHERN MIDDLE TN WORKFORCE BOARD**

## **JUNE 2022 FISCAL UPDATE**

### **ACTION**

- \* 2021-22 Q4 Financial Report
- \* 2022-23 Budget Revision \$13.3M
- \* 2022-23 Flexibility to Re-Purpose additional \$500k Dislocated Worker funding to Adult  
(Pending TN DOL Approval)
- \* EDSI and MAC Career Service Provider contracts:
  - Extend an additional 6 months through 6/30/23
  - Add another 6 month pro-ration of 18-month budget to contract
  - Pass-through program portion of National DW grant \$950k
- \* Fiscal Policy Update - Record Retention