

Northwest TN Workforce Board Executive Committee Meeting

October 25, 2023 – 10:00 a.m.

Administrative Office, 208 N. Mill Ave., Ste. B, Dyersburg, TN 38024 / Zoom

Minutes

Committee Members Attending: Ted Piazza, Jimmy Williamson, **via Zoom:** Ben Marks, Mayor John Penn Ridgeway

Staff Members and Contractors Attending in person: Jennifer Bane, Gina Johnson, LeAnn Lundberg, **via Zoom:** Ginger Powell, Lana Burchfiel, Laura Speer

Others Attending via Zoom: Sabra Bledsoe

Welcome and Call to Order: Ted Piazza welcomed everyone and confirmed that a quorum was present.

Review and Approval of Minutes: Minutes for the 7/26/23 meeting were reviewed.

- **MOTION:** Jimmy Williamson moved to approve the 7/26/23 Executive Committee minutes as presented, and Ben Marks seconded the motion. All were in favor and the motion carried.

Facilities and Technology: LeAnn Lundberg shared that she is looking at replacing some old equipment as well as changing phone providers since we have outgrown Vonage. The voiceover IP phone system is going to be a challenge since we have so many people who have different Ips under different employers.

Performance & Program Oversight: Laura Speer presented the following reports:

- **Quarterly Complaint Logs:** No complaints have been received.
- **Monitoring Status Report:** The full report is attached and no issues have been found.
- **Local Performance Results—Estimated PY23Q1 Results:** The attached report of estimated results was reviewed. We are either on track or approaching our target on everything for the first quarter. The yellow approaching target counts as meeting goals since at least 90% of the goal was attained.

Budget & Administration Reports:

- **Financial Status Report & Budget Update:** Gina Johnson presented the attached Financial Status Report detailing expenditure and obligation rates as of September, as well as fiscal performance results for the minimum participant cost rate (MPCR), Youth Work Experience expenditures, and In-School Youth (ISY) expenditures under the PY 22 and PY 23 funds. We are on target for all our fiscal goals. Jennifer Bane noted the attached detailed budget update shows the breakdown of expenditures by budget category. We will be receiving Consolidated Business Grant (CBG) funds for On-the-Job and Incumbent Worker Training, a new National Dislocated Worker Grant which will include participant and staffing funds, and an additional \$30,000 in apprenticeship funds which will allow us to fund some of the original request that was not fully funded.
- **Monitoring & Oversight Policy Change:** Jennifer Bane reviewed the proposed changes to the policy as listed in red in the attachment. Most of the changes are due to our request to be the CSP for Southwest. Additional details have been added to ensure segregation of duties between the Board / Fiscal Agent and CSP staff and adherence to the required firewall. Staff responsibilities have also been updated to reflect the change. We will have a separate service agreement for CSP staff in lieu of a contract.

Additionally, the proposed changes include a reduction from a 100% review of source documentation from contractors to a minimum of 20%, with the sample to be increased if issues are noted. Selecting a sample rather than conducting a 100% review is the process followed by most, if not all, other areas, the State Performance Accountability Review (PAR) team, and our external auditors. The general ledger would still be required for all invoices and then a minimum of a 20% sample would be selected for source document review, either based on number of transactions or expenditures. Jimmy Williamson and Ted Piazza noted that the sample must be random to ensure compliance with Generally Accepted Accounting Principles (GAAP). Jennifer will add this clarification to the policy language when it is brought to the Board for review.

- **MOTION:** Ben Marks moved to approve the Monitoring & Oversight Policy changes as listed in the attachment, with the addition that the minimum 20% sample would be random. Jimmy Williamson seconded the motion. All were in favor and the motion carried.

Other Business: Jennifer Bane presented the following:

- **State Workforce Board Development (SWDB) Updates:**
 - **PY 2023 Key Performance Indicator (KPI) Goals:** The attached handout details the final KPI targets. Lower targets were negotiated and accepted for Adult / Dislocated Worker and Youth based on available participant funding and staff capacity.
 - **Policy Updates:** The policies to be reviewed at the upcoming SWDB meeting were shared with the Board by email during the public comment period. Several concerns are noted with the Employment-Based Training Grant policy:
 1. Public sector employers will no longer be able to participate in OJT grants, with a possible exception for Registered Apprenticeships.
 2. Employers will only be able to participate for a 12-month period at a time and will then have a 12-month gap before they can participate again. Jennifer stated that she has submitted comments that this would be a deterrent to employer partners and that new partners are not being denied due to continued participation of existing partners. It also denies opportunities to WIOA-eligible participants for OJT positions.
- **2024 Meeting Schedules & Locations:** The proposed meeting dates and times are noted on the agenda. The schedule combines all committee meetings onto one day. Jennifer will request use of the Milan Chamber meeting space for these meetings.
- **Officer Elections:** Officers will need to be elected at the next meeting. Both the Chair and Vice-Chair are required to be private-sector representative. Jennifer will send out a reminder email.
- **Other:** Jennifer mentioned the Conflict of Interest Forms will be due soon. An email will be sent and forms will be available at the next Board meeting.

Future Meeting Dates & Upcoming Events: Ted Piazza reviewed the upcoming meeting dates and events listed on the agenda.

*Respectfully submitted,
Lana Burchfiel, Public Information Specialist*

**Northwest TN Workforce Board
Executive Committee Meeting
October 25, 2023 – 10:00 a.m.**

Administrative Office
208 N. Mill Ave., Ste. B
Dyersburg, TN 38024

[Join Zoom Meeting](#)
Meeting ID: 841 0884 4472
Passcode: 030815

Agenda

Welcome and Call to Order	Ted Piazza, Chair
Review and Approval of Minutes of 7/26/23 Meeting (Vote Required)	
Facilities and Technology	LeAnn Lundberg
Performance & Program Oversight	Laura Speer
- Quarterly Complaint Logs Update - Monitoring Status Report - Local Performance - Estimated PY 23 Q1 Results	
Budget & Administration	
- Financial Status Report & Budget Update - Monitoring & Oversight Policy Change (Vote Required)	Gina Johnson Jennifer Bane
Other Business	
- State Workforce Board Updates - PY 2023 Key Performance Indicator (KPI) Goals - Policy Updates 2024 Meeting Schedules & Locations - Officer Elections - Other	Jennifer Bane All

Future Meeting Dates & Upcoming Events

Meeting / Event	Date and Time	Location
State Board Meeting	November 3 rd , 8:30 am – 12:00 pm	Nashville / YouTube
Northwest Tennessee Workforce Board Meeting	November 28 th	TBD / Zoom
Future Virtually Speaking Webinar	December 7 th , 9:00 am	Zoom
Proposed 2024 Committee Meetings	Thursday, 11:30 am February 1 st May 2 nd August 1 st October 31 st	TBD / Zoom
Proposed 2024 Board Meetings	Tuesday, 10:00 am March 5 th June 4 th Thursday, Sept. 5 th (w/ SW) December 3 rd	TBD / Zoom

Northwest TN Workforce Board Executive Committee Meeting

July 26, 2023 – 10:00 a.m.

Administrative Office, 208 N. Mill Ave., Ste. B, Dyersburg, TN 38024

Minutes

Committee Members Attending: Ted Piazza, Jimmy Williamson, Lori Burdine; **via Zoom:** Brad Hurley, Rita Alexander, Ben Marks, Glad Castellaw

Staff Members and Contractors Attending in person: Jennifer Bane, Gina Johnson, LeAnn Lundberg, **via Zoom:** Ginger Powell, Lana Burchfiel, Kena Hamm

Welcome and Call to Order: Ted Piazza welcomed everyone and confirmed that a quorum was present.

Review and Approval of Minutes: Minutes for the 4/26/23 meeting were reviewed.

- **MOTION:** Lori Burdine moved to approve the 4/26/23 Executive Committee minutes as presented, and Jimmy Williamson seconded the motion. All were in favor and the motion carried.

Facilities and Technology: LeAnn Lundberg shared that she has surplus items to be picked up the State and she is working on setting up a few new computers for the GROWWTH staff.

Performance & Program Oversight: Jennifer Bane presented the following reports:

- Quarterly Complaint Logs: No complaints have been received.
- Monitoring Status Report: One-Stop Operator (OSO) and Career Service Provider (CSP) invoices continue to be monitored monthly. Only a few new On-the-Job Training (OJT) contracts have been added so far this program year and have not had any invoices or participants to monitor yet. Almost all of the Incumbent Worker Invoices have been monitored already and there have been no issues to report. The full report is attached.
- Local Performance Results—Estimated PY22Q3 Results: The attached report of estimated results was reviewed. All measures are being met at least 90% of the goal with the exception of the Dislocated Worker Employment Rate for 4th quarter which was at 74.5%, or 89.8% of the goal of 83%. Final results for the program year will be available in August.

Budget & Administration Reports:

- Financial Status Report & Budget Update: Gina Johnson presented the attached Financial Status Report detailing expenditure and obligation rates as of June. All grants ending 6/30/23 were fully expended with the exception of about \$2,100 in CBG funding, but we expect to also expend those funds. Title I expenditures were under budget overall, but the Youth program share of expenditures was over the amount allotted, so new year youth money had to be used. We are on target for all our fiscal goals.
- Program Year (PY) 23 Budget Update: Jennifer Bane presented the attached PY 2023 budget updates. We carried over \$144,000 more than estimated, with the majority of the carry over amount being administrative funding. Jennifer has already asked for an additional \$337,000 in participant funds to meet anticipated needs based on the prior year's spending and it has been approved. It appears the administrative funds requested will also be approved. The GROWWTH program spending is a little behind due to the delayed start. We are possibly getting some funding from the EDA Good Jobs Grant since they are now looking at using some existing training providers instead of developing new training centers as originally proposed.

Other Business: Jennifer Bane presented the following:

- State Workforce Board Updates: Jennifer reported that
 - o PY 2023 Key Performance Indicator (KPI) Goals: The attached handout details the State's proposed targets and our counterproposals based on available participant funding and staff capacity. The state has not yet responded to the counterproposals. Ted asked about if the Southwest region also proposed lower goals. Jennifer stated that she did request a lower Adult / Dislocated Worker enrollment and indicated that

additional funding might be needed to reach the goal. The Youth goal was accepted since there is sufficient youth participant funding expected to be available.

- o **Policy Updates:** The attached policies are currently posted for public comment and will be voted on at the August State Board meeting. One policy issues minor corrections to existing policies. The proposed Employment-Based Training policy would require that businesses be in operation in the United States for a year to be eligible. Our policy has been 6 months with a waiver for companies making substantiable financial investments. The Eligible Training Provider (ETP) policy proposes 60% instead of 70% overall completion and employment rates for programs with at least 10 WIOA students. We struggle accurately measuring these things since the training providers must provide social security numbers for all of the non-WIOA participants. The policy also notes that reciprocal agreements with other states, allowing programs on other states' ETP lists to be funded, ended 6/30/23. It has been requested that an agreement with Kentucky be established since we have participants in training there.
- **Other:** Committee members were asked if there were other business items to be addressed, but none were raised. Jennifer Bane gave a quick update on progress with the Southwest area and some of the continued obstacles. Staff are working with TN Department of Labor and Workforce Development staff on possible solutions in areas where State policies are a barrier.

Future Meeting Dates & Upcoming Events: Ted Piazza reviewed the upcoming meeting dates and events listed on the agenda.

*Respectfully submitted,
Lana Burchfiel, Public Information Specialist*

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Northwest TN Workforce Board MONITORING STATUS REPORT

Subcontractor	Purpose of Subcontract	Scheduled	Date of Review (s)	Corrective Action Needed	Letter Mailed:
2306-2307-OJT-47-3701669 Auston Mealer's Restaurant Equipment Service Attn: Loretta Mealer, Administration P.O. Box 872 Dyersburg, TN 38024 4380 loretta@austonmealer.com	On-the-Job Training: 06-08-23 to 07-29-23	Scheduled: 07-05-23	Phone Interview: 07-05-23 Fiscal: 09-06-2023	N/A	Letter Mailed: 09-07-2023
2305-2404-OJT-62-0714220 Knott's Wholesale Food, Inc. 125 N. Blakemore Street Paris, TN 38242 Stay Maatman, HR Manager 731-642-1961 Stacymaatman@knottsfoods.com	On-the-Job Training: 05-21-23 to 04-01-24	Scheduled: 06-14-23	Phone Interview: 06-14-23 Fiscal: 08-16-23	N/A	Letter Mailed: 08-17-23
2304-2404-OJT-94-3273443 Hitachi Energy Attn: Ayshia Fryer, HR Business Partner 1133 South Cavalier Drive Alamo, TN 38001 (731) 501-0910 Ayshia.fryer@hitachienergy.com	On-the-Job Training: 04-10-23 to 04-01-24	Scheduled: 04-25-2023	Phone Interview: 04-25-23 Fiscal: 07-13-23	N/A	Letter Mailed: 07-14-2023
2303-2406-OJT-45-5257134 Big Bore, LLC Attn: Ira Sellers and/or Jennea Jenkins 165 Mockingbird Avenue Henry, TN 38231 (731) 243-7494 Office@bigbore.com	On-the-Job Training: 03-06-23 to 03-05-24	Scheduled: 03-29-23	Phone Interview: 03-29-2023 Fiscal: 08-17-23	N/A	Letter Mailed: 08-17-23
2303-2311-OJT-26-2726861 Discovery Park of America PO Box 927 Union City, TN 38261 Lisa Glass, HR (731) 885-5455 lglass@discoveryparkofamerica.com	On-the-Job Training: 03-03-23 to 11-01-23	Scheduled: 04-19-23	Phone Interview: 04-19-23 Fiscal: 07-11-23	N/A	Letter Mailed: 07-11-23

Northwest TN Workforce Board MONITORING STATUS REPORT

Subcontractor	Purpose of Subcontract	Scheduled	Date of Review (s)	Corrective Action Needed	Letter Mailed:
2303-2402-OJT-81-2608176 Pediatric Associates of West TN, PLLC 1501 Brayton Avenue Dyersburg, TN 38024 Kasi Austin kasiautin@outlook.com (731)285-4111	On-the-Job Training: 03-03- 23 to 02-01-24	Scheduled:08-29-23	Phone Interview: 08-29-23 Fiscal:	N/A	Letter Mailed:
RFP CONTRACTACTS THROUGH					
2206-2306-CSP-62-0800930-MULTI Dyersburg State Community College 1510 Lake Road Dyersburg, TN 38024 Dr. Cook, President	Career and Business Services	Dates: 06-27-22 to 06-30-24		Invoices Checked Monthly per Executive Director	
2306-2406--OSO-62-0923487-SHARE Mid-Cumberland Human Resource Agency 1101 Kermit Drive, Suite 300 Nashville, TN 37217 jhamrick@mchra.com (615) 850-3907	One-Stop Operator Services:	Expires: 06-30-24		Invoices Checked Monthly per Executive Director	

Performance & Fiscal

On Track

Approaching Target

Off Target

Employment Rate 2nd Quarter After Exit

Adult

87.2%

Goal 83.5%

Dislocated Worker

76.6%

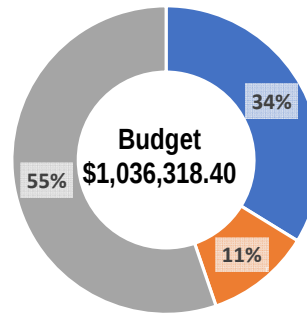
Goal 83.5%

Youth

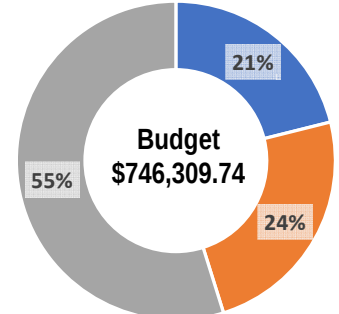
88.0%

Goal 78.0%

Adult



Dislocated Worker



Employment Rate 4th Quarter After Exit

Adult

84.0%

Goal 83.5%

Dislocated Worker

75.4%

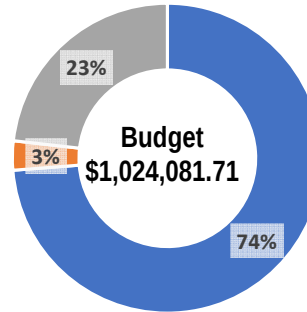
Goal 83.5%

Youth

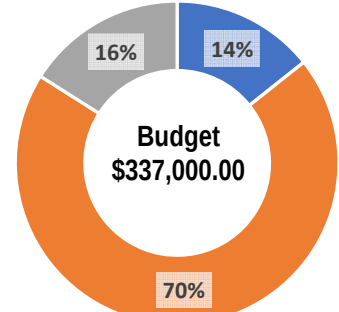
77.0%

Goal 77.0%

Youth



Statewide



Median Earnings 2nd Quarter After Exit

Adult

\$8,026.91

Goal \$7,025.00

Dislocated Worker

\$8,608.60

Goal \$7,149.60

Youth

\$3,568.46

Goal \$3,800.00

Expended \$755,288.74

Obligated \$31,293.79

Balance \$237,499.18

Expended \$48,208.71

Obligated \$234,834.49

Balance \$53,956.80

\$241,020.22 Expended

\$870,673.71 Balance

\$1.1 Million Title I Operating Budget

\$102,868.29 Expended

\$633,333.61 Balance

\$736,201.90 Title I Participant Budget

Credential Attainment Within 4 Quarter After Exit

Adult

75.3%

Goal 69.5%

Dislocated Worker

69.2%

Goal 70.6%

Youth

69.0%

Goal 71.0%



Measurable Skills Gain

Adult

68.9%

Goal 64.0%

Dislocated Worker

85.7%

Goal 61.2%

Youth

51.9%

Goal 55.0%



Northwest PY 2023 Budget - Revised Aug. 2023
vs. YTD Expenditures as of 9/30/23

	Budget	July - Sept. 2023	Percentage of Budget
Administrative Budget (all grants)	\$ 279,454.52	\$ 85,776.37	31%
Formula Participant Budget	\$ 736,201.90	\$ 102,868.29	14%
Operating Budget	\$ 1,111,693.93	\$ 277,923.48	25%
IFA Expenses (including OSO)	\$ 91,744.29	\$ 16,534.91	18%
Career Service Provider (w/o DWG)	\$ 640,000.00	\$ 129,417.90	20%
Board / Fiscal Agent Expenses	\$ 379,949.64	\$ 95,067.41	25%
Total Operating Expenses	\$ 1,111,693.93	\$ 241,020.22	22%
<i>Remaining Balance</i>	<i>\$ -</i>	<i>\$ 36,903.26</i>	<i>3%</i>
Adult & DW Part. & Program	\$ 1,434,388.84	\$ 199,196.78	14%
Youth Part. & Program	\$ 413,506.99	\$ 144,691.73	35%
Total Part. & Program	\$ 1,847,895.83	\$ 343,888.51	19%
<i>Remaining Balance</i>	<i>\$ -</i>	<i>\$ 1,504,007.32</i>	<i>81%</i>
Adult & DW Program Only	\$ 798,641.99	\$ 163,011.57	20%
Youth Program Only	\$ 313,051.94	\$ 78,008.65	25%
Total Program	\$ 1,111,693.93	\$ 241,020.22	22%
<i>Remaining Balance</i>	<i>\$ -</i>	<i>\$ 870,673.71</i>	<i>78%</i>

Monitoring and Oversight

Effective Date: ~~February 28, 2023~~ November 28, 2023

Duration: Indefinite

Purpose: To establish a policy for the conduct of monitoring of **Service Provider staff** / sub-recipients / **contractors** and the engagement of the local board in monitoring and oversight activities.

Policy: Monitoring is a joint responsibility of the Fiscal Agent/Staff to the Board, Workforce Innovations, Inc. (WFI), for the Local Workforce Development Board (LWDB). Compliance staff and each of the administrative-level staff are responsible for performing desktop review and monitoring of their respective area and reporting deficiencies to the appropriate Director. Fiscal and Compliance staff monitor all fiscal aspects of the programs. The LWDB staff and Tennessee Department of Labor and Workforce Development (TDLWD) staff, or their agents, monitor subcontractors and in-house operations. The State Comptroller's Office may also conduct an audit.

The Local Workforce Development Board will conduct monitoring and oversight of its' **Services Provider staff**, contractors and sub-recipients in receipt of WIOA funds. A pre-award financial review and / or on-site post-award monitoring of recipients that have little or no workforce program experience will be conducted no later than one hundred twenty (120) days after the award of a contract. All activities conducted and records maintained will be subject to monitoring and evaluation, including from both a fiscal, including procurement, and programmatic aspect. The LWDB Director of Performance and Compliance shall be responsible for overseeing the monitoring of each program activity and for ensuring corrective actions are taken when problems are found.

Programmatic, fiscal, and procurement monitoring may be completed through desktop review, on-site review, including reviews of policies, plans, and procedures governing all segments of program activities and program operations at least once during the program year, or a combination of the two processes. The review may include examining program records, questioning employees, interviewing participants, policy reviews, and entering any site or premise which receives WIOA funds. Participant files may be reviewed through random sampling. Monitoring will also determine compliance with the general procurement standards outlined in 2 CFR 200.318: "The non-Federal entity must use its own documented procurement procedures which reflect applicable State and local laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this section." The monitoring review is designed to help reduce possible audit exceptions, sanctions and unallowable costs. Monitoring at the Local Workforce Development Board, State, and Federal level will include a sample review of the Service Provider(s) **staff and / or contractors** and One-Stop Operator monitoring, oversight and quality control of participant training and corresponding employer payroll records, as well, as a sample review of how work-based activities align with and are facilitating the progress of career pathway strategies outlined in the local plan.

Internal Controls

Local organizations often function simultaneously in a variety of roles, including local fiscal agent, Local WDB staff, one-stop operator, and direct provider of services. Per 20 CFR 679.430, any organization that has been selected or otherwise designated to perform more than one of these functions must develop a written agreement with the Local WDB and CEO to clarify how the organization will carry out its responsibilities while demonstrating compliance with WIOA and corresponding regulations, relevant Office of Management and Budget (OMB) circulars, and the State's conflict of interest policy. Reporting

structures with clear separations of job duties and responsibilities have been established to create adequate firewalls as an internal control to ensure integrity in decision making, compliance with WIOA, corresponding regulations, and relevant OMB circulars:

Board / Fiscal Agent Staff

The Executive Director, hired and supervised by the President of the Board of Directors for the entity serving as staff to the Board / Fiscal Agent shall supervise, either directly or indirectly, staff designated as staff to the Board / Fiscal Agent to fulfill the following responsibilities:

As outlined in 20 CFR 679.400, staff to the board may assist with fulfilling the LWDB's required functions as outlined in 20 CFR 679.370 which may include:

- In partnership with the CLEO, develop and submit a local plan.
- Conduct workforce research and regional labor market analysis.
- Convene local workforce development system stakeholders to develop local plan.
- Lead efforts to engage with a diverse range of employers and entities.
- With secondary and postsecondary education programs, lead efforts to develop and implement career pathways.
- Identify and promote proven and promising strategies for meeting employer and jobseekers' needs.
- Develop strategies for using technology to maximize accessibility and effectiveness of the workforce system.
- Conduct program oversight activities.
- Negotiate and reach agreement on local performance accountability measures.
- Select one-stop operators to fulfill duties outlined in 20 CFR 678.660 and service provider staff / contractor(s) to fulfill the duties described below.
- Coordinate with education and training providers.
- Develop a budget for the board's activities.
- Assess annually the physical and programmatic accessibility of all one-stop centers in the local area.

As outlined in 20 CFR 679.420, and in an agreement with the CLEO, Board / Fiscal Agent staff shall also fulfill the responsibilities of the Fiscal Agent to include:

- Receive funds and ensure sustained fiscal integrity and accountability for expenditures of funds.
- Respond to audit financial findings.
- Maintain proper accounting records and adequate documentation.
- Prepare financial reports.
- Provide technical assistance to subrecipients regarding fiscal issues.
- At the direction of the LWDB, procure contracts or obtain written agreements, conduct financial monitoring of service providers, and ensure independent audit of all employment and training programs.

Service Provider Staff

The Director of Program Services, hired and supervised by the Vice-President of the Board of Directors, shall supervise, either directly or indirectly, staff designated as Service Provider staff to fulfill the responsibilities outlined in 20 CFR 680.140 and 20 CFR 680.160, which may include:

- Provide direct services including but not limited to participant intake, orientation, initial assessments, employment services, and referrals to other partners and services.

- Provide individualized direct services including but not limited to comprehensive and specialized assessments, case management, individual employment plans, career planning and vocational counseling.

Service Agreement

The Executive Director, under the supervision of the President, shall oversee the development of a Service Agreement outlining the assigned duties and objectives for the Service Provider as they relate to the delivery of services within the One-Stop System. If the LWDB receives specialized funding opportunities, then the Service Provider must work with the LWDB to execute these services at the direction of the LWDB. If United States Department of Labor (USDOL) or Tennessee Department of Labor and Workforce Development (TDLWD) allocate additional or specialized funds to the LWDA, the LWDB must direct the Service Provider on how to leverage the additional funds to maximize service delivery within the LWDA.

In addition to defining the role and scope of work of the Service Provider, the Service Agreement must include, but is not limited to, the following requirements and objectives for the Service Provider:

1. Develop a business plan to outline the staffing, procedures, and tools to be utilized to provide services through the One-Stop System and meet objectives within the assigned budget.
2. Manage Service Provider staff including but not limited to hiring and managing performance of staff, tracking and approving time worked and related expenses such as supplies, travel, etc., annual evaluation, and development and tracking of corrective action plans, if needed.
3. Manage provided participant budgets through tracking of participant obligations and expenditures, including, but not limited to, projecting current and future obligations for participants, ensuring invoices are received timely from vendors and training providers, posting vouchers in the VOS / Jobs4TN case management system, and submitting approved invoices to the Fiscal Agent staff for payment.
4. Submit periodic reports to the LWDB and its staff to inform them of trends concerning the delivery of services through the One-Stop System, such as, but not limited to, service levels by county, progress towards meeting the negotiated targets established by the TDLWD, training enrollments and expenditures by sector and provider type, outreach efforts, and services to target populations.

Compliance with the scope of work and objectives outlined in the Service Agreement will be monitored by the LWDB staff as described below. The Service Provider must respond to monitoring reports issued by the LWDB staff within the required timeframe by making and documenting corrections and issuing corrective action plans to staff if needed.

Monitoring and Oversight Functions by Staff

To ensure compliance with the above responsibilities and established firewalls and internal controls, the following monitoring and oversight activities will be conducted by the Board / Fiscal Agent staff.

Assistance Director of Performance & Compliance Coordinator - Responsible for developing and maintaining a schedule that will ensure one or more monitoring reviews per year of all aspects of the WIOA program. Write systematic procedures for monitoring of all service components for compliance with WIOA regulations and policies. Monitor all adult, dislocated worker, and youth training activities to assure compliance with local, state, and federal WIOA guidelines. Perform a fiscal review of source documents of LWDB / Fiscal Agent staff, Service Provider staff, contractors and/or vendors to assure

compliance. Produce written report(s) of all monitoring findings on contractor and/or vendors to the Director of Performance and Compliance, Executive Director and Contractor and the LWDB. Work with appropriate staff/contractors to remedy any findings. Conduct follow-up visit to affirm corrective action is taken in a timely manner. Monitor participant eligibility information and training documents. Performance related issues including monitoring for proper documentation, appropriate dates, allowable activities, etc. Serve as a contact for state monitors and auditors during their monitoring activities of the LWDB. Provide input to, and participate in, the review/evaluation process for Requests for Proposal process.

Fiscal Staff – Responsible for desktop review of subcontracts, invoices, support service contracts and reimbursements on a monthly basis, as well as grant budget and expenditure rates.

Director of Performance and Compliance - Provide policy and direction to ~~Career~~ Service Provider, Business Services staff, Compliance ~~staff~~ ~~Coordinators~~, and subcontractors regarding eligibility and record keeping. Responsible for reviewing program objectives and preparing participant status reports on a monthly basis.

Deputy Director – Serve as the Service Agreement manager to ensure compliance and performance by collecting and reviewing reports from the Service Provider, providing or arranging for technical assistance or guidance, and assisting in the development of performance and monitoring reports.

EO Officer - Responsible for on-site review of facilities to assure compliance with state and federal regulations.

Monitoring and Oversight by Function

PROCUREMENT – Procurement of goods and services are monitored on an ongoing basis by the Local Workforce Development Board / ~~Fiscal Agent~~ Staff. Staff prepare requisitions for purchase and secure approval of the Director of Finance & Administrative Services and/or Executive Director or his/her designee. The Assistant Director of Finance reviews purchases prior to approval by the Director of Finance.

FISCAL – Budgets and expenditures of all grants are monitored on a monthly basis by the Director of Finance and reported to the Executive Director and reported quarterly to the Local Workforce Development Board Executive Committee who then presents to the full board, including the local elected officials as ex-officio members. Monthly reports are prepared based on the organization's accounting system and approved by the Executive Director prior to submission to the TDLWD. A review of expenditure and budget levels is made on a periodic basis dependent upon the particular grant. ~~Fiscal monitoring of the LWDB / Fiscal Agent by the Assistant Director of Performance & Compliance will occur monthly through a review of all bank and credit card statements and reconciliations, selection of a sample of transactions to review, and issuing of a monitoring report with any corrections needed.~~

Every subcontract must be fiscally monitored during the contract period. The ~~Assistant Director of Performance & Compliance~~ ~~Coordinator~~ will keep a file for each individual contract and keep the monitoring report updated. The fiscal monitoring process is as follows:

- One Stop Operator and Career Service Providers ~~staff~~ / contract invoices are reviewed monthly.
- For On-the-Job Training and Incumbent Worker Training Contracts, if the contract allows for contractors to bill at the end of the participant's training, the invoice is monitored once received for payment. A minimum of one invoice must be monitored per contract.

- Back-up documentation supporting the invoice must be included. Back-up documentation is defined as supporting documents for amounts on the invoice.

PROGRAM OBJECTIVES – Program Objectives are monitored on a monthly basis. The Executive Director, and / or his / her designee, and Director of Performance and Compliance review internal reports submitted by the ~~Career~~ Service Provider and One Stop Operator Staff and/or contractor and prepares summary reports to be reviewed by the Local Workforce Development Board.

GRIEVANCE PROCEDURES – Monitoring includes a review of a sample of participant files to assure that the participant has acknowledged receipt of a registrant handbook and grievance procedures.

RECORD KEEPING – All contracts, participant and fiscal records are to be maintained for a minimum of five years, unless subject to audit which are kept until the audit is concluded.

EQUAL EMPLOYMENT OPPORTUNITY – On-site visits to subcontractors and in-house operations include an interview with participants regarding their knowledge of Equal Employment Opportunity and a viewing of appropriate equal opportunity posters.

AMERICANS WITH DISABILITIES ACT – On-site visits to subcontractors and in-house operations include discussions with subcontractors and a review of the property.

FINANCIAL MANAGEMENT AND INTERNAL CONTROLS – Grantees that receive money from the federal government (grants, cooperative agreements, etc.) and expend more than \$750,000 of federal dollars in a single fiscal year are required to have Single Audits. A Single Audit is when an independent auditor, selected by the Board of Directors, goes over a grantee's financial management processes, including its financial management system and its compliance with all of its federal grant requirements. The purpose is to ensure grantees receiving federal grant funds use the funds in compliance with the government's requirements. In addition to reviewing financial management processes, the independent auditor shall also monitor compliance with programmatic processes such as segregation of duties, internal controls, and eligibility determination and record keeping.

On-Site Program Evaluation

The purpose of the on-site evaluation process is for the Compliance Coordinator to observe each program, to see how the program is being implemented, meet and interview some of the participants to assess their satisfaction/success with the program and to observe that funds are being spent according to the contract. There are specific monitoring questions to be utilized during the on-site review according to the program. The current contracts that require on-site evaluation (subject to change) are On-the-Job Training contracts and may include the One Stop Operator and ~~Career~~ Service Provider staff / contractor(s). Site reviews may be conducted virtually as needed.

One-Stop Operator Monitoring & Oversight

The Local Workforce Development Board will monitor the activities of the One-Stop Operator at least once annually during the contract period, no less than sixty (60) days prior to the expiration date of the contract. The monitoring process will determine compliance with the contractual agreement, federal, state and LWDB policies.

Additionally, all invoices will be monitored prior to payment, including a review of a minimum of a 20% sample of source documents supporting payments. The sample must include a variety of types of

expenditures and account for associated risk level. Identification of significant compliance issues may result in expansion of the sample. In the event of inappropriate or undocumented requests for reimbursement, the Authorized Signatory Authority will be notified and given an opportunity to provide additional documentation and/or explanation. The Director of Performance and Compliance will consult with the Director of Finance & Administrative Services regarding any final adjustments to the invoice.

Upon completion of a monitoring, the Performance and Compliance staff will develop a formal, written, monitoring report, detailing the results of the monitoring, including any necessary corrective action. The report is forwarded to the Executive Director for review prior to issuing the final report to the One-Stop Operator Signatory Authority. The final report will be issued within thirty (30) days of the completion of the review. Continued monitoring will occur if the Correction Action Plan is deemed inadequate. Results of the monitoring will be reported to the Executive Committee of the LWDB, who will then report results to the full LWDB, which includes the Consortium of Local Elected Officials as ex-officio members.

Service Provider(s) Monitoring & Oversight

The Local Workforce Development Board will monitor the activities of the Service Provider(s) staff and / or contractor at least once annually during the program year or contract period, no less than sixty (60) days prior to the expiration date of the contract, if applicable. The monitoring process will determine compliance with contractual or service agreements, federal, state and LWDB policies.

In addition, a minimum of a 20% sample of the newly enrolled participants will be monitored on an on-going basis for eligibility and other compliance factors, including but not limited to, providing appropriate service strategies, proper documentation, accurate recording of data, and timely case notes. The LWDB will utilize the TDLWD Program Accountability Review form, Data Validation guidelines, policies of the Board, policies of the TN Department of Labor and Workforce Development, the WIOA, federal regulations and guidance, and other relevant information as the basis of the review of the following areas:

- Date of WIOA Application in Jobs4TN
- Eligibility Date in Jobs4TN
- Contact Information (Social Security Number, Address, Phone Numbers)
- Demographic Information (DOB, Gender, US Citizenship, Selective Service if applicable, Race, Disability)
- Veteran Information
- Employment Information
- Education Information
- Public Assistance Information
- Barriers
- Household and Income
- Federal Initiatives
- Eligibility Summary
- Eligibility correctly entered in Jobs4TN with supporting documentation in the electronic file verifying how they were made eligible. The income table for Adult/DW/Youth should be attached to support the time-period of eligibility if making eligible based on income.
- If the participant was made eligible as a youth (family of one) based on a disability, supporting documentation showing proof of the disability must be in the file.
- Data has been keyed and documents uploaded to VOS within 10 days.
- Assessment used and uploaded to documents in VOS
- Objective Assessment keyed for Youth – Dates should match activities keyed in VOS

- Individual Employment Plan/Service Strategy (goals to be in line with the participants plan) – Dates should match activities keyed in VOS
- Appropriate Activities keyed in VOS with documentation to back up dates: for Youth – 14 Elements reflected accordingly
- Case Notes are required monthly and should be detail oriented and clearly explain what is actively occurring with the participant. It is crucial that staff is obtaining direct contact with the participant or school/institution to determine their current progress in school.
- EO statement/Grievance complaint procedure.
- Proof of other grant coordination in the file (SAR showing they are getting pell, lottery, etc. The EAS form can be used to show proof of the SAR).
- Review all ITAs and travel authorizations with back up documentation.

Identification of significant compliance issues may result in expansion of the sample. A sample of participant files identified to close/exit will be reviewed for compliance with closure/exit data and documentation. Further, all invoices will be monitored prior to payment, including a review of a 20% sample of source documents supporting payments. The sample must include a variety of types of expenditures and account for associated risk level. Identification of significant compliance issues may result in expansion of the sample. In the event of inappropriate or undocumented requests for reimbursement, the Authorized Signatory Authority will be notified and given an opportunity to provide additional documentation/explanation. The Director of Performance and Compliance will consult with the Director of Finance & Administrative Services regarding any final adjustments to the invoice.

Upon completion of a monitoring, the Performance and Compliance staff will develop a formal, written, monitoring report, detailing the results of the monitoring, including any necessary corrective action. The report is forwarded to the Executive Director for review prior to issuing the final report to the Service Provider Signatory Authority. The final report will be issued within thirty (30) days of the completion of the review. Continued monitoring will occur if the Correction Action Plan is deemed inadequate. Results of the monitoring will be reported to the Executive Committee of the, LWDB, who will then report results to the full LWDB, which includes the Consortium of Local Elected Officials as ex-officio members.

Data Validation

In accordance with TDLWD policy, each local workforce development board (LWDB) will also be responsible to conduct data validation review of each program for which they are a sub-recipient of program funds. The results of the data validation must be submitted to the State Workforce Development Board (SWDB) along with the LWDB's other monitoring report(s) as requested. The LWDB must conduct the number of data validation reviews based on the sample size established by the TDLWD Workforce Services (WFS) staff. Notification of sample size will be sent to the LWDBs through a 'Notice of Data Validation.' During the validation process, any files that contain data errors will be expected to be corrected within 30 business days after the submission of the quarterly monitoring report.

Service Provider Monitoring (as Contracting Authority)

It is the responsibility of the Service Provider staff / contractor to monitor (fiscal/programmatic and

desktop/onsite) their subcontracts at least annually, as well as a sample of participant files. The Service Provider will submit a plan/schedule of monitoring to Workforce Innovations, Inc. the Fiscal Agent/Staff for the LWDBs. A copy of any completed monitoring reports will be due by the 10th of the month for the previous month.

The Service Provider is also responsible for monitoring a sample of all other participants (non-work-based training) for eligibility, service strategy, expenditures and data validation elements.

One-Stop Operator Oversight

It is the responsibility of the One-Stop Operator to provide quality control checks on services provided through the American Job Center on behalf of participants and employers. This may include a review of new enrollments to determine that appropriate services were provided and review of potential exits to determine if additional services are required. Additionally, the One-Stop Operator will conduct surveys with individual and employer customers of the American Job Center.

Other Subcontractor(s) Monitoring

It is the responsibility of the Director of Performance & Compliance to monitor (fiscal/programmatic and desktop/onsite) other subcontracts at least annually. Contracts for Work-Based Training must be monitored at least once by the contracting authority. Monitoring will be based on the contract agreement and may be performed by the contract manager or another position. If the Work-Based Training is for reimbursement of wages, the employer must submit the following for review:

- Invoice form;
- Payroll records showing the gross wages paid to the trainee;
- Time records showing actual hours worked;

Onsite monitoring visits should be conducted shortly after the trainee begins work, and include additional visits at appropriate intervals (determined by the length of the training plan). Effective monitoring also includes desk review of correspondence from the employer, including payment invoices and required documentation to support those invoices.

Monitoring must also include regular review of each trainee's progress in meeting program and service strategy objectives. Such strategies should include the trainee's acquisition of basic/occupational skills and the adequacy of supportive services provided as related to work-based training. Any deviation from the work-based training contract should be dealt with and documented promptly. A sample of participant files engaged in work-based training should be monitored for eligibility, service strategy, expenditures, and data validation elements.

Additional Monitoring

The LWDB and its staff reserve the right to conduct additional monitoring outside the established procedures in this policy. Additional monitoring will only take place when there is reason to suspect that there are non-compliant practices occurring by the **Service Provider staff and / or** subcontractor. If additional monitoring is conducted, the **staff /** subcontractor will be notified in writing to identify the reason and timeline to be established.

Monitoring Reports & Resolution Process

Written monitoring reports are comprised of five basic areas:

1. Scope of Contract
2. Timeliness of Invoice Submission

3. Adequacy of Documentation
4. Proper Completion of Invoice
5. Compliance within Budget Limits

A finding in a monitoring report is any specific violation of program authorization/statute, other applicable Federal, State, or local statutes, policies, or procedures, applicable appropriations, implementing regulations, Executive Orders, OMB Circulars (including 2 CFR part 200 & 2 CFR part 2900), DOL-ETA Directives, or terms and conditions of the award. Findings always require action to correct the violation and documentation of non-compliance is required. Observations or areas of concerns are not specific compliance violations but may have negatively impacted program or could lead to a finding in the future. They may include activities related to effectiveness objectives or indicators that have not been met and could possibly result in a finding at some later point if not addressed. Typically, no corrective action is specified but suggestion for improvement may be made.

Additionally, if necessary, reports will include instructions to the subcontractor for:

1. Developing a Corrective Action Plan, such as instruction on how, where, and when to submit a corrective action plan. Corrective action plans must typically be received within 30 business days of the issued monitoring report unless otherwise stated.
2. Addressing Questioned Costs such as providing missing documentation, making repayments, or transferring costs to another source.

LWDB Compliance staff will track issues until the corrective action is completed and may verify on-site if appropriate. If action is not completed within the required timeframe, additional actions may be taken if needed and may include:

1. Temporarily withhold cash payments;
2. Disallow all or part of the cost of the activity or action not in compliance;
3. Wholly or partly suspend or terminate the award; or
4. Take other remedies that may be legally available.

Submission of Quarterly Monitoring Reports

Each LWDB must submit a report that outlines the results of their monitoring to WFS staff by the designated deadline in the format prescribed by WFS. The submitted reports will be reviewed to ensure compliance, track progress, identify concerns, and locate best practices. A report for each LWDA and planning region will be compiled and WFS staff will address concerns or offer technical assistance as needed.

Appeals Process

In the event of a disagreement resulting from the monitoring process, the contractor and / or sub-recipient may choose to file an appeal. A disagreement is considered to have reached the level of an appeal when an issue arises that is not easily coming to a point of resolution. It is the responsibility of the LWDB Chair (or designee) to coordinate the dispute resolution to ensure that issues are being resolved appropriately through the appeal process:

- (1) Any disputes shall first be attempted to be resolved informally.
- (2) Should informal resolution efforts fail, the appeal process must be formally initiated by the petitioner seeking resolution. The petitioner must send a notification to the LWDB Chair (or designee) regarding the conflict within 10 business days.
- (3) The LWDB Chair (or designee) shall place the dispute on the agenda of a special meeting of the LWDB's Executive Committee. The Executive Committee shall attempt to mediate and resolve the

dispute. Disputes shall be resolved by a 2/3 majority consent of the Executive Committee members present.

- (4) The decision of the Executive Committee shall be final and binding unless such a decision is in contradiction of applicable State and Federal laws or regulations governing the contractor and / or sub-recipient agencies.
- (5) The right of appeal no longer exists when a decision is final. Additionally, final decisions will not be precedent-setting or binding on future conflict resolutions unless they are officially stated in this procedure.
- (6) The Executive Committee must provide a written response and dated summary of the proposed resolution to all parties.
- (7) The LWDB Chair (or designee) will contact the petitioner and the appropriate parties to verify that all are in agreement with the proposed resolution.

Reference: 2 CFR 200.331

Related TDLWD Policy:

[WFSPolicyMonitoring.pdf \(tn.gov\)](#) (effective 11-13-20)

[WFSGuidanceLocalWorkforceDevelopmentBoardMonitoringActivities.pdf \(tn.gov\)](#) (effective 3-20-18)

[WFSPolicyDataValidation.pdf \(tn.gov\)](#) (effective 11-13-20)

[2022-2023 WIOA Monitoring Guidance \(tn.gov\)](#) (effective 10-1-22)

Vetted and Approved by the Local Workforce Development Board: ~~February 28, 2023~~ November 28, 2023

Jimmy Williamson, Chair
Northwest Tennessee Workforce Board

Targets	Tennessee	Northwest	Greater Memphis	Southwest	Northern Middle	Upper Cumberland	Southern Middle	Northeast	East	Southeast	Grand West	Grand Middle	Grand East
Key Performance Indicators - Targets July 1, 2023 through June 30, 2024													
Adult and Dislocated Worker- New Enrollment													
PY22 Q1	1,185	74	322	68	210	84	59	49	214	105	464	353	368
PY22 Q2	1,177	47	322	45	250	85	59	49	215	105	414	394	369
PY22 Q3	1,168	42	323	40	250	85	59	49	215	105	405	394	369
PY22 Q4	1,226	52	323	49	290	84	58	49	215	106	424	432	370
PY22	4,756	215	1,290	202	1,000	338	235	196	859	421	1,707	1,573	1,476
Apprenticeship- Peak Enrollment													
PY23 Q1	6,774												
PY23 Q2	6,774												
PY23 Q3	6,774												
PY23 Q4	6,774												
PY23	6,774												
Apprenticeship- State Certified Pre-Apprenticeship Programs													
PY23 Q1	55												
PY23 Q2	55												
PY23 Q3	55												
PY23 Q4	55												
PY23	55	0	0	0	0	0	0	0	0	0	0	0	0
Jobs for Veterans- New Enrollment													
PY22 Q1	113	12	24	8	36	5	3	7	12	6	44	44	25
PY22 Q2	119	12	24	9	37	6	4	7	13	7	45	47	27
PY22 Q3	119	13	24	9	37	5	4	7	13	7	46	46	27
PY22 Q4	118	13	24	9	37	5	4	7	13	6	46	46	26
PY22	469	50	96	35	147	21	15	28	51	26	181	183	105
Justice-Involved Individuals- New Enrollment													
PY22 Q1	939	41	123	65	267	69	39	95	155	85	229	375	335
PY22 Q2	905	29	123	42	267	69	39	95	156	85	194	375	336
PY22 Q3	906	29	123	43	267	69	39	95	156	85	195	375	336
PY22 Q4	867	20	123	12	268	69	39	95	155	86	155	376	336
PY22	3,617	119	492	162	1,069	276	156	380	622	341	773	1,501	1,343
Reemployment Services- Co-enrollment													
PY22 Q1	57	2	8	4	12	4	8	2	10	7	14	24	19
PY22 Q2	57	2	8	4	12	4	7	2	10	8	14	23	20
PY22 Q3	59	3	8	4	12	5	7	2	10	8	15	24	20
PY22 Q4	63	3	9	5	13	5	7	3	11	7	17	25	21
PY22	236	10	33	17	49	18	29	9	41	30	60	96	80

Targets	Tennessee	Workforce Mid-South	Workforce Innovations	TNCSA	The Career Team	First TN HRA	ETSU							
Senior Employment - <i>New Enrollment</i>														
PY22 Q1	12	4	1	2	1	2	2							
PY22 Q2	13	4	1	2	2	2	2							
PY22 Q3	15	4	2	3	2	2	2							
PY22 Q4	16	4	2	3	2	2	3							
PY22	56	16	6	10	7	8	9							
Targets	Tennessee	Northwest	Greater Memphis	Southwest	Northern Middle	Upper Cumberland	Southern Middle	Northeast	East	Southeast	Grand West	Grand Middle	Grand East	
SNAP Employment and Training- <i>New Enrollment</i>														
PY22 Q1	737	15	144	31	294	45	12	28	122	46	190	351	196	
PY22 Q2	726	15	145	32	294	30	12	28	123	47	192	336	198	
PY22 Q3	721	15	145	32	295	25	11	28	123	47	192	331	198	
PY22 Q4	725	16	145	32	295	26	12	29	123	47	193	333	199	
PY22	2,909	61	579	127	1,178	126	47	113	491	187	767	1,351	791	
Trade Adjustment Assistance- <i>Co-enrollment with Title I Dislocated Worker</i>														
PY22 Q1	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	
PY22 Q2	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	
PY22 Q3	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	
PY22 Q4	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	
PY22	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	
*Beginning 10/1/2022, 90% of those Trade participants eligible to be enrolled within Title I Dislocated Worker need to be co-enrolled														
Wagner-Peyser - <i>New Enrollment</i>														
PY22 Q1	5,641	253	621	219	1,425	425	749	293	999	657	1,093	2,599	1,949	
PY22 Q2	5,763	253	739	219	1,425	426	749	294	1,000	658	1,211	2,600	1,952	
PY22 Q3	5,765	254	739	219	1,426	426	749	294	1,000	658	1,212	2,601	1,952	
PY22 Q4	5,879	254	856	219	1,426	425	749	293	999	658	1,329	2,600	1,950	
PY22	23,048	1,014	2,955	876	5,702	1,702	2,996	1,174	3,998	2,631	4,845	10,400	7,803	
Youth - <i>New Enrollment</i>														
PY22 Q1	474	20	102	35	97	30	29	20	90	51	157	156	161	
PY22 Q2	486	20	121	15	115	24	29	20	91	51	156	168	162	
PY22 Q3	467	11	121	15	116	22	29	11	91	51	147	167	153	
PY22 Q4	532	21	142	21	132	25	28	21	90	52	184	185	163	
PY22	1,959	72	486	86	460	101	115	72	362	205	644	676	639	
In-School Youth- <i>New Enrollment</i>														
PY22 Q1	156	4	41	13	34	8	9	4	27	16	58	51	47	
PY22 Q2	158	9	37	7	35	9	9	10	27	15	53	53	52	
PY22 Q3	145	5	37	3	35	9	9	5	27	15	45	53	47	
PY22 Q4	134	3	31	3	34	8	8	3	28	16	37	50	47	
PY22	593	21	146	26	138	34	35	22	109	62	193	207	193	

Youth Work Experience - New Enrollment													
PY22 Q1	407	24	18	24	175	15	71	20	22	38	66	261	80
PY22 Q2	273	32	19	32	25	15	70	20	23	37	83	110	80
PY22 Q3	243	17	19	17	25	15	70	20	23	37	53	110	80
PY22 Q4	554	47	19	47	275	15	71	20	22	38	113	361	80
PY22	1,477	120	75	120	500	60	282	80	90	150	315	842	320

PY23 Pilot- Targets													
a) <u>Living Wage</u> - participants who achieve MIT living wage within 1 year of exit													
PY23 Q1	953	62	254	55	48	83	49	85	112	205	371	180	402
PY23 Q2	950	62	254	54	47	82	49	85	112	205	370	178	402
PY23 Q3	950	62	254	54	47	82	49	85	112	205	370	178	402
PY23 Q4	956	63	254	55	48	83	50	85	113	205	372	181	403
PY23	3,809	249	1,016	218	190	330	197	340	449	820	1,483	717	1,609

Local Key Performance Indicator- Targets													
Incumbent Worker and On-the-Job Training- New Enrollment													
PY23 Q1													
PY23 Q2													
PY23 Q3													
PY23 Q4													
PY23				150									

Annual

PY22 Key Performance Indicator Achievement Thresholds		
5	Best Practice	110%+
4	Target Achieved	91 to 110%
3	Approaching Target	71 to 90%
2	Needs Improvement	51 to 70%
1	Needs Significant Improvement	21 to 50%
0	Unacceptable	0 to 20%