Northwest TN Workforce Board
Executive Committee
February 5, 2020 – 8:30 a.m.
313 West Cedar St., Dyersburg, TN
Conference Call – 1-877-216-1555, Passcode #845157

Committee Members Present: Ted Piazza, Jimmy Williamson
Committee Members via Conference Call: Rita Alexander, Brad Hurley, Mayor Gary Reasons, Ben Marks
Staff Members Present: Jennifer Bane, Ginger Powell, Laura Speer, LeAnn Lundberg, Gina Johnson

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

Review and Approval of Minutes: Minutes for the December 5, 2019 Executive Committee Meeting were reviewed.

- **MOTION**: **Mayor Gary Reasons moved to approve the December 5, 2019 Executive Committee minutes as presented and Ben Marks seconded the motion. All were in favor and the motion carried.**

Facilities and Technology Update:

- Re-Designation / Certification of American Job Centers:
  - Carroll County AJC Certification / ADA Results
    - Vocational Rehabilitation Program preformed an Accessibility and Accommodation review (12/9/2019) of the American Job Center at Huntingdon. Areas reviewed for compliance included parking, entrance, reception, public areas, accessible restrooms, resource room, communication, signage, fire alarms, and emergency egress planning. All areas were in order and no formal recommendations were made.
    - One-Stop Certification (12/9/2019)- Jennifer noted suggestions for improvement which include: update signage to reflect current branding. An electronic American Job Center sign would be preferred. The budget does not currently support the purchase of new signage. The AJC would benefit from additional partners to best utilize space and be more cost effective. The AJC at Huntingdon will remain a Comprehensive center. One-Stop Certification Checklist attached.
  - Henry County AJC Certification / ADA Results
    - One-Stop Certification (12/17/2019): suggestions for improvement include: updated signage to American Job Center. The budget does not currently support the purchase of new signage. Staff recommends the AJC transition from a fulltime affiliate center to a part-time specialized center. The center will open Monday – Thursday with established access points on Fridays. TNLWD Specialized Center One-Stop Certification Checklist attached.
  - Weakley County American Job Center Certification
    - One-Stop Certification (12/17/2019): suggestions for improvement include: the addition of two yard signs for extra entrances, permanent signage, and add to the directory in the lobby. Staff recommends the AJC transition from a fulltime affiliate center to a part-time specialized center. The center will open Monday – Thursday with established access points on Fridays. TNLWD Specialized Center One-Stop Certification Checklist attached.
  - **MOTION**: **Jimmy Williams moved to approve Carroll, Henry, and Weakley County Certifications as presented and Mayor Gary Reasons seconded the motion. All were in favor and the motion carried.**
    - Dyer, Obion, and Gibson will complete One-Stop Certification prior to June 30, 2020.
- Other Facilities & ADA Review Updates: LeAnn Lundberg reported that she is currently updating resource room computers.

Performance and Program Oversight: Laura Speer reported that Quarterly Complaint Logs have been submitted and there were none to report. The Career Service Provider report indicated 16 findings and 36 observations of the total 52 participants reviewed as shown below.

Summary:	OCT	%	NOV	%	DEC	%	TOTAL	TOTAL %
Number of Participants Reviewed:	14		23		15		52	
Number / Percentage of Participants with Findings:	6	43%	6	26%	4	27%	16	31%

Number / Percentage of Participants with:								
1. Eligibility Findings:	**0**	**0%**	**0**	**0%**	**1**	**25%**	**1**	**6%**
2. Data Validation Findings:	**2**	**33%**	**4**	**67%**	**2**	**50%**	**8**	**50%**
3. Data Entry Findings:	**4**	**67%**	**0**	**0%**	**0**	**0%**	**4**	**25%**
4. Case Management Findings:	**0**	**0%**	**2**	**33%**	**2**	**50%**	**4**	**25%**
Number / Percentage of Participants with Observations:	**5**	**36%**	**21**	**91%**	**10**	**67%**	**36**	**69%**
Number / Percentage of Participants with No Monitoring Issues:	**6**	**43%**	**1**	**4%**	**4**	**27%**	**11**	**21%**

- RESEA Monitoring – October through December 2019, there were 146 RESEA participants. The monitoring sample consisted of 17 participants (12%) based on sample size / method direction provided by state staff. Three of the monitored participants were missing items. Missing items collected as of 2/4/2020.
- Data Validation occurred January 2020 and we are awaiting results.

Budget & Administration Update: Gina Johnson provided an overview of the attached Financial Status Report as of December 31, 2019, which showed the minimum participant cost rate (MPCR) was 44.16 %, which is 4.16% higher than the required 40% minimum. Out-of-School Youth expenditures exceed the required 75% at over 95%, and Work Experience expenditures exceeded the required 20% at over 43%. Jennifer Bane also provided an update on the budget. Expenditures decreased between October and December, making year-to-date expenditures on track for the program year. We have expended 50% of our participant budget and 51% of our operating budget for the program year. We have expended 30% of our RESEA budget which began in October 2019 and is effective through September 2020. The Title I share of the IFA costs increased slightly due to January IFA changes. It is not yet reflected in the budget, but a savings of at least $18,000 is expected by June due to a position being eliminated from the Board staff.

Other:

- **Conflict of Interest Forms** – please complete and submit to Lana Burchfiel.
- **Dyer, Gibson, and Obion County AJC Certifications** – Staff recommends the centers maintain current designation. Certifications will be conducted and completed prior to June 30, 2020.
- **Proposed Targets for Key Performance Indicators (KPIs):** Jennifer Bane reviewed NW Proposed Targets for KPIs. The goals will be finalized at the upcoming State Workforce Board meeting February 21, 2020. Local Area Directors provided KPI Targets in which Jennifer considered historical enrollment data as well as current budgets for NW projections. State staff adjusted proposed targets and has encouraged staff to request additional funding if necessary, to reach the new, increased targets. Adult and Dislocated Worker New Enrollment is 380 and Youth is 107. Without additional funding, our budget will not support 380 new Adult and Dislocated Worker enrollments. Re-entry New Enrollments is 309. TAA Co-Enrollments was 34.8% but we have since been notified by the state this will be increased to 50%. See attachment – West TN & NW Proposed Targets for KPIs.

Future Meeting Dates & Upcoming Events

- Next Board Meeting: February 25th – Discovery Park of America, 12:00 pm (lunch at 11:30 am)
- State Board Meeting: February 21st
- Remaining 2020 Committee Meeting Dates:
  - Wednesday, April 29, 10:00 am
  - Wednesday, July 29, 10:00 am
  - Wednesday, October 28, 10:00 am

Federal Youth Monitoring Results:

August – September, 2019, the US Department of Labor, Employment and Training Administration conducted on-site compliance review for the Title I-Youth Program. The review covered policies, guidance, procedures, and knowledge of staff in three local areas to include NW. In total there were 15 findings, 10 of which applied to the NW area, six concerns, and one promising practice (Findings and State Responses attached). Synopsis of NW action items:

- Finding 4 & 5: LWDA MOUs Missing Required Information – NW will list the 14 elements individually to indicate which element will be referred and to what provider. A separate MOU will be developed to include all other non-mandated referral partners.
- Finding 7: State has Not Defined Basic Skills Deficient – The State has since defined basic skills deficiency within the state youth eligibility policy. The policy was approved by the State Workforce Development Board on November 8, 2019. NW adopted the State's definition.
- Finding 8: Local Area Requires Additional Assistance Policy Inconsistent with State Policy – NW local area definition was acceptable and matched the State youth eligibility policy, which was updated at the November State Workforce Board meeting. In the new State Plan, the State is declining to provide a definition and is allowing local areas to develop a definition of requires additional assistance. Supporting information will need to be submitted to the State before the local Board can adopt a new definition.
- Finding 9: Insufficient Monitoring for Youth Program Requirements – locally, NW will begin monitoring the 5% report for In-School Youth eligibility. Further corrections will be made at the State level.
- Finding 10: Local Areas Not Addressing Individuals Deemed Ineligible – NW will report using the referral tracking process currently in place.
- Finding 11: Local Areas Determining Youth Participation Based on Age – NW will ensure our written procedures indicate participant eligibility determination based on service need first.
- Finding 12: Work Experience Activities Do Not Include Occupational and Academic Components – A training plan will be developed for work experience participants similar to those used by On-the-Job Training participants and will document the academic components included in the work experience.
- Finding 13: Lack of Alignment Between Needs Assessment, ISS, Career Pathways, and Services Provided – NW sector studies and pathways are complete and available. NW will clearly define the pathway in the ISS.
- Finding 14: LWDB Missing Parent and Youth Involvement in Program Design – NW utilizes Board and Committee members to co-serve as parents and electronic surveys are used to capture input for both populations. NW encouraged by state staff to gather, in-person parent and youth stakeholders to gain input into program design.
- Finding 15: Lack of AJC and EO Signage (Northern Middle local area) – NW needs new signage to reflect current branding. Funding does not currently allow for purchasing signage. We are hoping to receive funding from the State to make updates to signage.

As there was no other business, the meeting was adjourned.

Respectfully Submitted,
Ginger Powell

Northwest TN Workforce Board
Executive Committee
February 5, 2020 – 8:30 a.m.
313 West Cedar Street
Dyersburg, TN
Conference Call – 1-877-216-1555, Passcode #845157

Agenda

Welcome and Call to Order — Ted Piazza, Chair
Review and Approval of Minutes of 12-5-19 Meeting **(Vote Required)**

Facilities and Technology Update
- Re-Designation / Certification of American Job Centers — Jennifer Bane
  - Carroll County AJC Certification / ADA Results **(Vote Required)**
  - Henry County AJC Certification / ADA Results **(Vote Required)**
  - Weakley County American Job Center Certification **(Vote Required)**
- Other Facilities & ADA Review Updates — LeAnn Lundberg

Performance & Program Oversight — Laura Speer
- Quarterly Complaint Logs Update
- Monitoring Status Report
- Local Performance – Estimated PY 19 Q2 Results

Budget & Administration Update
- Financial Status Report — Gina Johnson
  - Minimum/Maximum Requirements
- Budget Update — Jennifer Bane

Other — Jennifer Bane
- Conflict of Interest Forms
- Dyer, Gibson, and Obion County AJC Certifications
- Proposed Targets for Key Performance Indicators (KPIs)

Future Meeting Dates & Upcoming Events
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Federal Youth Monitoring Results — State Staff

Northwest TN Workforce Board Executive Committee
December 5, 2019 – 10:00 a.m.
Conference Call – 1-877-216-1555, Passcode #845157
Minutes

Committee Members via Conference Call: Mayor Gary Reasons, Rita Alexander, Ted Piazza, Jimmy Williamson, Mayor Chris Young, Ben Marks
Staff Members via Conference Call: Lana Burchfiel, Jennifer Bane, Laura Speer, LeAnn Lundberg, Gina Johnson

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

Review and Approval of Minutes: Minutes for the October 30, 2019 Executive Committee Meeting were reviewed.

- **MOTION: Gary Reasons moved to approve the October 30, 2019 Executive Committee minutes as presented and Jimmy seconded the motion. All were in favor and the motion carried.**

Lake County American Job Center Hours of Operation: Jennifer Bane informed the group that the Career Service Provider has requested to merge the vacant part-time Lake County position with another vacant position which would require travel to other counties. In order to create and fill the new position, and retain the future staff person, a change in the hours to the Lake County Specialized Center's hours of operation is recommended. The new proposed hours have been approved by the Lake County Mayor and are Monday and Tuesday, 8:00 am to 4:00 pm, and Thursday from 8:00 am to 11:30 am, instead of the current schedule of Monday, Tuesday, Thursday, and Friday from 11:30 am to 4:00 pm. Additionally, the hours for the access point at the Ridgely Public Library will change from Wednesday, 1:00 to 5:00 pm, to Thursday, 1:00 to 4:30 pm. In order to provide 30-day notice to the TN Department of Labor and Workforce Development, the proposed hours would be effective January 6, 2020.

- **MOTION: Rita Alexander moved to approve changes to the Lake County AJC located at the Lake County Courthouse and Access Point at the Ridgely Public Library as presented. Ben Marks seconded the motion. All were in favor and the motion carried.**

Other: Jennifer also provided the following updates to the group:

- PAR Exit Conference: An exit conference was held yesterday morning with PAR to discuss the results of the recent review. There were no findings and no observations this year. Unlike in previous years, a review of participant files was not included. It is our understanding this will be dine quarterly by the Workforce Services staff, separate from the PAR monitoring. Additionally, it was announced at the State Board meeting in November that Ernst and Young back will return for a second round of reviews sometime between January and March. Like last time, they may request to speak with staff, board members, or Mayors.
- Budget Update: The budget is being monitored closely. Expenditures were on track after September and October, but in looking forward to future obligations, we have obligated all but about $9,000 of our Adult and Dislocated Worker participant funds for the year (through June 30th). Of the $265,000 we set aside for On-the-Job Training (OJT) for the year – the same as expenses last year, we have spent just under $152,000 so far, but have already obligated the rest of it to current participants. A large portion of the OJT expenses and obligations is due to using OJT funds to support employment of RAMP graduates. A request has been submitted to the State for $331,500 in Adult and Dislocated Worker participant money to allow for new spring enrollments and OJTs. The request also includes money for the Dyer, Gibson, and Henry County RAMP classes that are not covered under the rural funding. This would increase our $1.14 million participant budget closer to what have spent the last couple of years, $1.5 million. Achieving our new enrollments targets would be impossible without being able to enroll new participants, so we hope to have an answer to our request before we have to turn anyone away for spring term. Additionally, because of the limited budget, the fact that we will not be providing business services to the Greater Memphis area as we had hoped, and the end of the Consolidated Business Grant and Incumbent Worker Training money, one Board position will be eliminated at the end of January. Ted Piazza inquired about the availability of extra funds. Jennifer state that after speaking with Kristie Bennett, Regional Director, she was encouraged to go ahead and submit the request for more funds. The State staff have always encouraged us to ask and want us to be able to continue to serve participants, so we are hopeful we will receive at least some funding.

As there was no other business, the meeting was adjourned.
Respectfully Submitted,
Lana Burchfiel, Public Information Specialist

TN Department of Human Services

Vocational Rehabilitation Program

Accessibility and Accommodation Survey for the American Job Center at Huntingdon, TN

Location: Carroll County American Job Center
470 Mustang Drive
Huntingdon, TN 38344001

Date of Survey: December 9, 2019

Survey conducted by: David Parrish, Vocational Rehabilitation Program

The Tennessee Vocational Rehabilitation (VR) Program is authorized to provide information and technical assistance to individuals and entities that are covered by the Americans with Disabilities Act (ADA) and Workforce Innovation and Opportunity Act (WIOA) Section 188. However, VR is not responsible for enforcement of the ADA or WIOA requirements. The information and/or technical assistance contained in this report are intended solely as informational guidance and are neither a determination of legal rights or responsibilities under the ADA or WIOA nor binding on any agency enforcement responsibilities under the ADA or WIOA.

Following are the survey findings and recommendations.

1.0 Parking

1.1 The Huntingdon American Job Center (AJC) is located in a separate building and is a one level structure. There are parking areas in front and behind the building and they reasonably level. There are appropriate curb cuts where needed.

1.2 There are four accessible parking spaces and 4 van accessible spaces which are appropriately signed and striped.

Recommendations: None.

2.0 Entrance

2.1 The AJC is accessed directly from the parking lot and there is no need of ramps because the building and the parking lot are on the same level. Once inside, the office has an open landscape so that all areas are accessible.

2.3 The entry door has a buzzer at an appropriate height and staff will assist as needed.

Recommendations: None

3.0 Reception

3.1 The reception area desk is wheel chair accessible. Staff is aware of how to greet and serve an individual in a wheel chair, including the use of a clipboard.

Recommendations: None

4.0 Public Areas

4.1 All public areas are accessible with no hazards.

Recommendations: None

5.0 Accessible Restrooms

5.1 All restrooms are fully accessible.

Recommendations: None

6.0 Resource Room

6.1 The resource room can accommodate individuals with disabilities.

6.2 The computer available for individuals with disabilities meets the minimum requirement for wheel chair accessibility.

6.3 Staff is available to accommodate the use of computers, printers, faxes and copiers when needed.

Recommendations: None

7.0 Communication

7.1 Staff is aware of how to use the phone relay service for the deaf and computers to communicate with the deaf and hard of hearing.

7.2 Staff is aware of contacting VR for assistance with obtaining documents in Braille.

7.3 Staff is aware of how to contact and schedule a sign language interpreter.

Recommendations: None

8.0 Signage

8.1 Identification signage on the exterior of the office is properly posted.

Recommendations: None

10.0 Fire Alarms

10.1 The building meets all requirements set forth by the local fire marshal.

Recommendations: None

11.0 Emergency Egress Planning

11.1 There is a general knowledge of emergency egress planning.

11.2 Staff understands that in the event of an emergency that all rooms within the AJC need to be cleared of customers and that individuals with disabilities may require additional assistance to exit the building.

Recommendations: None

In general, staff is ready to accommodate individuals with disabilities if accommodations are not available. For example, staff is ready to provide personal assistance for individuals with visual impairments; are able to rearrange furniture for persons in wheelchairs; are able to provide accommodations upon request; etc.

Master

Department of Labor & Workforce Development

One-Stop Certification Checklist

Date: 12/9/19	**Type of AJC: Comprehensive**	
American Job Center Address: **470 Mustang Drive**		
Contact Name: **Benny Roberts**	**Contact Phone:** **731-352-8815**	**Contact Email:** **dayton.roberts@tn.gov**

CRITERIA	MET	NOT MET	N/A
REQUIRED PARTNERS * = electronic connection | direct linkage			
Title I Adult Services	☑	☐	☐
Title I Dislocated Worker Services	☑	☐	☐
Wagner-Peyser Title III	☑	☐	☐
Adult Education	☑	☐	☐
Vocational Rehabilitation	☑	☐	☐
Title V SCSEP	☑ *	☐	☐
TANF	☑ *	☐	☐
Career and Technical Education Programs (postsecondary) Carl D. Perkins Act	☑ *	☐	☐
Trade Adjustment Assistance	☑	☐	☐
Veterans Employment Services	☑	☐	☐
Community Services Block Grant	☑ *	☐	☐
Housing & Urban Development Employment & Training	☐	☐	☑
Unemployment Insurance	☑	☐	☐
Services of one or more core partners are available	☑	☐	☐
ONE-STOP OPERATIONS			
The MOU between the LWDB and required One-Stop partners is signed and in place	☑	☐	☐
The MOU reflects the name and location of the AJC and the way in which required core partners will integrate services within the center	☑	☐	☐
The center is implementing the MOU specifications	☑	☐	☐
The One-Stop Operator (OSO) is competitively selected and is in compliance with state and federal guidelines	☑	☐	☐
Roles and responsibilities of the OSO are clearly identified	☑	☐	☐
Roles and responsibilities of the Career Services Provider (CSP) are clearly identified	☑	☐	☐
At least one Title I staff member and one Wagner-Peyser staff member will be on-site during operating hours, and have the capacity to provide services to all individuals	☑	☐	☐
The AJC is operating in a cost-efficient manner	☑	☐	☐
The AJC actively conducts outreach and provides services such as participation in workshops, job fairs and recruitment events	☑	☐	☐
Marketing materials provide an overview of all core partner services, and are available to customers	☑	☐	☐
The AJC connects with the community through multiple community partnerships and access points	☑	☐	☐

TN Department of Labor & Workforce Development

The AJC staff view themselves as part of the One-Stop system, and views all customers as shared customers, creating a positive customer experience	☑	☐	☐
The AJC strives to increase the percentage of customers placed in economically sustainable employment	☑	☐	☐
The AJC strives to increase the percentage of customers receiving education and training services	☑	☐	☐
The AJC has procedures in place to meet the WIOA requirements for integrated planning and service delivery	☑	☐	☐
The AJC has identified ways to support the changing role as TANF as a one-stop partner, including coordination of services and enrollment	☑	☐	☐
The AJC staff view themselves as part of the One-Stop systems, and view all customers as shared customers, creating a positive customer experience	☑	☐	☐
FOCUS ON PARTICIPANT SERVICE			
The AJC operates during required business hours	☑	☐	☐
The AJC provides flexible operating hours, including evenings and weekends as needed	☑	☐	☐
The AJC is established to provide services tailored to the needs of a specific group (Long Beach)	☐	☐	☑
The AJC provides employer meetings tailored to the needs of a specific group being serviced	☐	☐	☐
The AJC provides initial assessment of skill level, aptitudes, abilities, and supportive service needs	☑	☐	☐
The AJC utilizes labor market employment statistics information, relating to local, regional, and national labor market areas, including job vacancy listings, information on job skills necessary to obtain the jobs; and information relating to local occupations in demand and the earnings, skill requirements, and opportunities for advancement for such occupations	☑	☐	☐
All AJC staff members can identify regional targeted sector pathways, and understands those terms in implementation of providing services to customers	☑	☐	☐
The AJC has available, and provides when applicable, education and training opportunities for customers at multiple skill and experience levels	☑	☐	☐
The AJC has intensive menu of training opportunities, and staff is available to assist customers with enrollment, including career pathways to middle class jobs, education and training, work-based learning, OJT, and registered apprenticeships	☑	☐	☐
The AJC staff are competent and proficient in establishing eligibility for programs, or financial aid assistance for education and training	☑	☐	☐
The AJC provides ease of access to credentialed education and training	☑	☐	☐
The AJC uses LMI to actively promote targeted sector and high-demand occupations to customers, including job search and placement services, and career counseling	☑	☐	☐
The local plan identifies ways in which core partners will integrate services and referrals among partner programs	☑	☐	☐
Core partners support integrated intake, case management, and reporting outcomes	☑	☐	☐
There is a customer feedback process in place, including regularly addressing issues	☑	☐	☐
The AJC provides information and assistance regarding filing claims for unemployment compensation	☑	☐	☐
FOCUS ON BUSINESS SERVICE			
The AJC establishes and develops relationships and networks with large and small employers and their intermediaries	☑	☐	☐

Department of Labor & Workforce Development

The AJC develops, convenes, and implements industry or sector partnerships	☑	☐	☐
The AJC has a defined strategy for capturing employer input on design and delivery of job-seeker services	☑	☐	☐
The AJC provides employer services, including qualified candidate referral, on-site recruitment events, pre-employment testing, employee aptitude verification, and subsidies for hiring and training	☑	☐	☐
The AJC identifies technical assistance needs for improving business results and utilization of available resources	☑	☐	☐
The local plan specifies the ways in which core partners will identify and respond to local area economic needs	☑	☐	☐
The local plan and/or MOU define specific ways in which the AJC will match existing business relationships and new business relationships with skilled workers	☑	☐	☐
There is a business customer feedback in place, including regularly addressing issues	☑	☐	☐
There is a cooperatively functioning Business Services Team (BST) in place	☑	☐	☐
The local plan clearly outlines how business services will be conducted	☑	☐	☐
SITE SPECIFIC — needs updated			
The American Job Center (AJC) identifier is highly visible inside and outside the center	☑	☐	☐
The AJC is easily identified in the community, with signage clearly visible to the public	☑ *	☐	☐
The AJC conveys a professional and welcoming environment, both inside and outside	☑ *	☐	☐
The AJC is within reasonable distance and accessibility of public transportation	☑	☐	☐
Adequate parking, including accessible, is available at the AJC	☑	☐	☐
Interior signage results in easy navigation for customers	☑	☐	☐
Conference space sufficiently meets partner and customer needs	☑	☐	☐
Adequate safety and security measures are in place to protect customers and staff	☑	☐	☐
There is an up-to-date, easily accessible Emergency Action plan	☑	☐	☐
Center hours are easily identifiable, and meet the requirement of 8:00am – 4:30pm	☑	☐	☐
The AJC is accessible, as required by the Americans with Disabilities Act's (ADA) standards	☑	☐	☐
not required There is a written procedure for accommodation of customer requests for services to be provided outside of normal operating hours (in Certification Application)	☑	☐	☐
PERFORMANCE			
The AJC contributes to the achievement of WIOA Performance Indicators for all core partners	☑	☐	☐
Core partners track and periodically report performance outcomes to the LWDB, and reflects such in meeting minutes	☑	☐	☐
The policies, processes, and actions of the AJC support of local levels of performance	☑	☐	☐
RESOURCE AREAS			
There is technology available to assist all customers, including customers with disabilities and non-English speaking customers	☑	☐	☐
Up-to-date information about services and supportive services is provided within the Resource areas	☑	☐	☐
There are precautions in place for preventing abuse of internet access	☑	☐	☐
Staff is readily available for assistance in the resource areas	☑	☐	☐

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There is sufficient, accessible work space and computer stations for customer use	☑	☐	☐
A calendar of services and events is easily visible and available	☑	☐	☐
EQUAL OPPORTUNITY ASSURANCE			
The Equal Opportunity Officer (EOO) regularly reviews the AJC's policies, procedures, and facility for accessibility and equal opportunity	☑	☐	☐
The EOO provides recommendations and technical assistance as a result of reviews	☑	☐	☐
The AJC implements veteran's priority of service requirements	☑	☐	☐
Core program partner staff are periodically trained on EO practices	☑	☐	☐
AJC staff demonstrate knowledge and use of assistive technologies	☑	☐	☐
Reasonable accommodations are provided in order to avoid discrimination and meet individual's needs	☑	☐	☐
AJC staff demonstrate appropriate and effective communication with individuals with disabilities	☑	☐	☐
There is a Corrective Action Plan (CAP) in the event partners or customers identify barriers to services	☑	☐	☐
PROGRAMMATIC ACCESSIBILITY			
The AJC provides basic and individualized career services in person or via technology	☑	☐	☐
The AJC provides access to training, education, employment, supportive, and business services	☑	☐	☐
Consistent with the "direct linkage" requirement, all services are available through a direct connection with the AJC, either via on-site staff or via real-time technology	☑	☐	☐
The AJC identifier is highly visible inside and outside the facility, and appears on all products, programs, services information, and facilities and properties Needs Updating	☑	☐	☐
The core partners have documented the referral and direct linkage system, and define both how referrals are tracked and that CAPs are in place	☑	☐	☐
All program services are made available and accessible to all individuals	☑	☐	☐
The AJC has a system in place to promptly greet all customers, identify their needs and reason for their visit, and quickly connect them to appropriate services	☑	☐	☐
The core partners have identified the services applicable to their program, and the AJC staff has developed methods for integrated delivery of those services	☑	☐	☐
Duplicate enrollment information is not requested via application or assessment across multiple programs Except as required by VOS.	☑	☐	☐
The AJC staff are able to make knowledgeable referrals across partner programs	☑	☐	☐
The AJC staff are able to demonstrate that modified services provided to individuals with disabilities are ensured to be as effective as non-modified services provided	☑	☐	☐
Assistive technology devices or auxiliary aids are available	☑	☐	☐
There is a written policy in place that defines how partners make reasonable accommodations and handle requests for accommodations	☑	☐	☐
The AJC's resources include bilingual materials or translation services, when necessary	☑	☐	☐
There is an organizational chart that reflects and ensures staff work in functional teams, rather than program specific teams, to coordinate programs, service delivery, and referrals	☑	☐	☐
CONTINUOUS IMPROVEMENT			
The AJC provides labor market information (LMI)	☑	☐	☐

TN Department of Labor & Workforce Development

The core partners and OSO utilize performance reports and customer satisfaction survey results to identify methods for improvement	☑	☐	☐
The AJC has regular staff meetings with all staff to build relationships, provide updates on center activities, and discuss strategies for AJC improvement	☑	☐	☐
The AJC seeks to minimize redundant employer contacts while maximizing access to system-wide, integrated business services	☑	☐	☐
The AJC staff have received customer service training	☑	☐	☐
All AJC staff have received training on how to use LMI to help customers identify career pathways, develop in-demand skills and credentials, and find jobs	☑	☐	☐
There is a professional development plan for all AJC staff	☑	☐	☐
LWDB meeting minutes reflect discussions about strategic improvements	☑	☐	☐
Customer satisfaction surveys allow customers to provide comments	☑	☐	☐
Customer satisfaction survey results are periodically reported to the LWDB and used to identify continuous improvement efforts	☑	☐	☐
The AJC has a process in place for customers to provide feedback or complaints outside of the customer feedback survey, identifying how complaints are tracked and CAPs are implemented	☑	☐	☐
The AJC has internal systems in place to identify and track operational efficiency and effectiveness	☑	☐	☐
Training on new policies, procedures, or guidance is available to AJC staff in a timely manner	☑	☐	☐
The AJC has procedures in place to meet the WIOA requirements for integrated planning and service delivery	☑	☐	☐
The AJC has an established process for examining how the center will identify and respond to technical assistance needs of customers	☑	☐	☐

Suggestions for Improvement

1) Updated Signage
   - Door Cling

2) Need Additional Partners (to best utilize space + be more cost effective)

Master

Department of Labor & Workforce Development

TNLWD Specialized Center One-Stop Certification Checklist

Date: 12/17/19

American Job Center Address:
55 Jones Bend Rd. Ext. Paris, TN 38242

Contact Name:	Contact Phone:	Contact Email:
Rhonda Mitchum	731-641-1022	rmitchum@dscc.edu

What Comprehensive AJC and Affiliate AJC are your referral sites (include addresses):
470 Mustang Dr. Huntingdon, TN
204 S. 2nd St. Union City, TN

CRITERIA	MET	NOT MET
REQUIRED PARTNERS		
WIOA Title I	☑	☐
ONE-STOP OPERATIONS		
The MOU between the LWDB and required One-Stop partners is signed and in place	☑	☐
The MOU reflects the name and location of the AJC and the way in which required core partners will integrate services within the center	☑	☐
The center is implementing the MOU specifications	☑	☐
The One-Stop Operator (OSO) is competitively selected and is in compliance with state and federal guidelines	☑	☐
Roles and responsibilities of the OSO are clearly identified	☑	☐
Roles and responsibilities of the Career Services Provider (CSP) are clearly identified	☑	☐
The AJC is operating in a cost-efficient manner	☑	☐
The AJC staff view themselves as part of the One-Stop system, and views all customers as shared customers, creating a positive customer experience	☑	☐
The AJC strives to increase the percentage of customers placed in economically sustainable employment	☑	☐
The AJC strives to increase the percentage of customers receiving education and training services	☑	☐
The AJC has procedures in place to meet the WIOA requirements for integrated planning and service delivery	☑	☐
The AJC has identified ways to support the changing role as TANF as a one-stop partner, including coordination of services and enrollment	☑	☐
FOCUS ON PARTICIPANT SERVICE		
The AJC operates during required business hours	☑	☐
The AJC provides flexible operating hours, including evenings and weekends	☑	☐
The AJC has available, and provides when applicable, education and training opportunities for customers at multiple skill and experience levels	☑	☐
The AJC staff are competent and proficient in establishing eligibility for programs, or financial aid assistance for education and training	☑	☐
The AJC provides initial assessment of skill level, aptitudes, abilities, and supportive service needs	☑	☐

TN Department of Labor & Workforce Development

The AJC provides employer meetings tailored to the needs of the specific group being serviced	☑	☐
All AJC staff members can identify regional targeted sector pathways, and understands those terms in implementation of providing services to customers	☑	☐
The AJC provides ease of access to credentialed education and training	☑	☐
The AJC uses LMI to actively promote targeted sector and high-demand occupations to customers, including job search and placement services, and career counseling	☑	☐
The local plan identifies ways in which core partners will integrate services and referrals among partner programs	☑	☐
There is a customer feedback process in place, including regularly addressing issues	☑	☐
The AJC has intensive menu of training opportunities, and staff is available to assist customers with enrollment, including career pathways to middle class jobs, education and training, work-based learning, OJT, and registered apprenticeships	☑	☐
The AJC provides information and assistance regarding filing claims for unemployment compensation	☑	☐
SITE SPECIFIC		
The American Job Center (AJC) identifier is highly visible inside and outside the center	☑	☐
The AJC is easily identified in the community, with signage clearly visible to the public	☑	☐
The AJC conveys a professional and welcoming environment, both inside and outside	☑	☐
Interior signage results in easy navigation for customers	☑	☐
Conference space sufficiently meets partner and customer needs	☑	☐
Adequate safety and security measures are in place to protect customers and staff	☑	☐
There is an up-to-date, easily accessible Emergency Action plan	☐	☐
Center hours are easily identifiable	☑	☐
The AJC is accessible, as required by the Americans with Disabilities Act's (ADA) standards	☑	☐
PERFORMANCE		
The AJC contributes to the achievement of WIOA Performance Indicators for all core partners	☑	☐
Core partners track and periodically report performance outcomes to the LWDB, and reflects such in meeting minutes	☑	☐
The policies, processes, and actions of the AJC support of local levels of performance	☑	☐
RESOURCE AREAS		
There is technology available to assist all customers, including customers with disabilities and non-English speaking customers	☑	☐
Up-to-date information about services and supportive services is provided within the Resource areas	☑	☐
There is sufficient, accessible work space and computer stations for customers to utilize	☑	☐
There are precautions in place for preventing abuse of internet access	☑	☐
Staff is readily available to provide assistance	☑	☐

TN Labor & Workforce Development

A calendar of services and events is easily visible and available	☑	☐
EQUAL OPPORTUNITY ASSURANCE		
The Equal Opportunity Officer (EOO) regularly reviews the AJC's policies, procedures, and facility for accessibility and equal opportunity	☑	☐
The EOO provides recommendations and technical assistance as a result of reviews	☑	☐
The AJC implements veteran's priority of service requirements	☑	☐
Core program partner staff are periodically trained on EO practices	☑	☐
AJC staff demonstrate knowledge and use of assistive technologies	☑	☐
Reasonable accommodations are provided in order to avoid discrimination and meet individual's needs	☑	☐
AJC staff demonstrate appropriate and effective communication with individuals with disabilities	☑	☐
There is a Corrective Action Plan (CAP) in the event partners or customers identify barriers to services	☑	☐
PROGRAMMATIC ACCESSIBILITY		
The AJC provides basic and individualized career services in person or via technology	☑	☐
The AJC provides access to training, education, employment, supportive, and business services	☑	☐
Consistent with the "direct linkage" requirement, all services are available through a direct connection with the AJC, either via on-site staff or via real-time technology	☑	☐
The AJC identifier is highly visible inside and outside the facility, and appears on all products, programs, services information, and facilities and properties	☑	☐
The core partners have documented the referral and direct linkage system, and define both how referrals are tracked and that CAPs are in place	☑	☐
All program services are made available and accessible to all individuals	☑	☐
The AJC has a system in place to promptly greet all customers, identify their needs and reason for their visit, and quickly connect them to appropriate services	☑	☐
The core partners take specific steps to coordinate programs, service delivery, and referrals	☑	☐
The AJC staff are able to make knowledgeable referrals across partner programs	☑	☐
The AJC staff are able to demonstrate that modified services provided to individuals with disabilities are ensured to be as effective as non-modified services provided	☑	☐
Assistive technology devices or auxiliary aids are available	☑	☐
There is a written policy in place that defines how partners make reasonable accommodations and handle requests for accommodations	☑	☐
The AJC's resources include bilingual materials or translation services, when necessary	☑	☐
There is an organizational chart that reflects and ensures staff work in functional teams, rather than program specific teams, to coordinate programs, service delivery, and referrals	☑	☐
CONTINUOUS IMPROVEMENT		
The core partners and OSO utilize performance reports and customer satisfaction survey results to identify methods for improvement	☑	☐

TN Labor & Workforce Development

The AJC has regular staff meetings with all staff to build relationships, provide updates on center activities, and discuss strategies for AJC improvement	☑	☐
The AJC seeks to minimize redundant employer contacts while maximizing access to system-wide, integrated business services	☑	☐
The AJC staff have received customer service training	☑	☐
All AJC staff have received training on how to use LMI to help customers identify career pathways, develop in-demand skills and credentials, and find jobs	☑	☐
There is a professional development plan for all AJC staff	☑	☐
LWDB meeting minutes reflect discussions about strategic improvements	☑	☐
Customer satisfaction surveys allows customers to provide comments	☑	☐
Customer satisfaction survey results are periodically reported to the LWDB and used to identify continuous improvement efforts	☑	☐
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The AJC has an established process for examining how the center will identify and respond to technical assistance needs of customers	☑	☐

Recommendations:

(1) Updated signage.

Department of Labor & Workforce Development

Master

TNLWD Specialized Center One-Stop Certification Checklist

Date: 12/17/19

American Job Center Address:
116 W. Main St. Dresden, TN 38225

Contact Name:	Contact Phone:	Contact Email:
Rhonda Mitchum	731-364-0100	rmitchum@dscc.edu

What Comprehensive AJC and Affiliate AJC are your referral sites (include addresses):
470 Mustang Dr. Huntingdon TN
204 S. 2nd St. Union City, TN

CRITERIA	MET	NOT MET
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Department of Labor & Workforce Development

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The AJC has an established process for examining how the center will identify and respond to technical assistance needs of customers	☑	☐

Recommended:

- Two additional yard signs for extra entrances.
- Permanent signage pending.
- Add to directory in lobby.

Northwest TN Workforce Board MONITORING STATUS REPORT						
Subcontractor	Purpose of Subcontract	Scheduled	Date of Review (s)	Findings	Corrective Action Needed	Letter Mailed:
1909-2005-OJT-81-5319386 Allergy Lab Solutions, LLC Mr. Matthew Bane 118 Hidden Hill Cove Martin, TN 38237 (845) 820-0057 mattb.als@outlook.c om	On-the-Job Training: 09-09-19 to 05-24-20	Scheduled: 10-14-19	Site Visit: 10-14-19 Fiscal: 01-06-20		N/A	Letter Mailed: 01-07-2020
1902-1911-OJT-03-0365162-CB NSK Steering Systems America, Inc. 2926 Fort Hudson Road Dyersburg, TN 38024 Lisa Wells, HR Coordinator wellslW@nassa.nsk.com	On-the-Job Training: 02-08-19 to 11-01-19	Scheduled: N/A	Site Visit: N/A Fiscal: 11-04-19		N/A	Letter Mailed: 11-04-2019
1909-2007-OJT-37-1893800 Pottery Direct McKenzie, LLC 89 Bruce Street McKenzie, TN 38201 Brigette Parker, Accountant (855) 484-2900 x 229 accounting@potterydirect.com	On-the-Job Training: 09-13-19 to 07-15-20	Scheduled:10-08-19	Site Visit: 10-08-19 Fiscal: 12-04-19		N/A	Letter Mailed: 12-04-19
1909-2003-OJT-62-1779895 Cutting Specialists, Inc. 25570 Highway 22 North McKenzie, TN 38201 (731) 352-5351 x 207 Carol Holt, HR Accounts Manager carol.holt@supertuf.com	On-the-Job Training: 09-10-19 to 03-01-20	Scheduled: 10-08-19	Site Visit: 10-08-19 Fiscal: 11-15-2019		N/A	Letter Mailed: 11-21-2019
1908-2007-OJT-62-600780 Obion County Government 316 South Third Street Union City, TN 38281 (731) 885-9611 Mayor Benny McGuire mayor@obioncounty.org	On-the-Job Training: 08-30-19 to 07-01-20	Scheduled: 12-10-19	Site Visit: 12-10-19 Fiscal:		N/A	Letter Mailed:
1908-2008-OJT-45-3132419 InSource Material, LLC 170 Mark I Drive Henry, TN 38231 Lorraine Dodd, Office Manager (731) 243-7700 Loraine@insourcematerials.com	On-The-Job Training: 08-14-19 to 08-13-20	Scheduled:10-08-19	Site Visit: 10-08-19 Fiscal: 12-04-19		N/A	Letter Mailed: 12-04-19

1908-2006-OJT-26-1318112 Dana Sealing Products, LLC 100 Plumley Drive Paris, TN 38242 Andrea Gooch, HR Manager (731) 231-1540 endrea.gooch@dana.com	On-the-Job Training: 08-01-19 to 06-01-20	Scheduled: 12-09-19	Site Visit: 12-09-19 Fiscal:		N/A	Letter Mailed:
1907-2007-OJT-62-600282 City of Dyersburg Sue Teague, HR Manager 425 West Court Street Dyersburg, TN 38024 (731) 288-7607 steague@dyersburgtn.gov	On-the-Job Training: 07-10-19 to 07-01-20	Scheduled:08-14-19	Site Visit: 08-14-19 Fiscal: 12-04-19		N/A	Letter Mailed: 12-05-19
1907-2007-OJT-62-6000667 Henry County Government 101 Washington Street Paris, TN 38242 Ron Walkins, EMA Director (731) 664-2678 hcema@bellsouth.net	On-the-Job Training: 07-15-19 to 07-01-20	Scheduled:08-21-19	Site Visit: 08-21-19 Fiscal: 10-28-19		N/A	Letter Mailed: 11-01-2019
1907-2007-OJT-61-1350626 Amteck, LLC 1106 East Court Street Dyersburg, TN 38024 Stephanie Ballard, Administrative Assistant (731) 286-2772 sba;;ard@amteck.com	On-the-Job Training: 07-18-19 to 07-02-20	Scheduled:08-14-19	Site Visit: 08-14-19 Fiscal: 11-07-19		N/A	Letter Mailed: 11-08-19
1907-2001-OJT-34-0196300 Eaton Corporation dba Eaton Aeroquip, LLC 860 Blankenship Road Newbern, TN 38059 Attn: Ms. Carmeda Keen, HR Manager camedalkeen@eaton.con (731) 627-4213	On-the-Job Training: 07-18-19 to 01-01-20	Scheduled: 10-31-19	Site Visit: 10-31-19 Fiscal:		N/A	Letter Mailed:
1905-2001-OJT-26-2114590-CB Reelfood Manor Health and Rehab Charles Moore Jr. Administrator 1034 Reelfoot Street Tiptonville, TN 38079 (7310 253-6681 admin@rf-hc,com	On-The-Job Training: 05-24-19 to 01-01-20	Scheduled:	Site Visit: Fiscal:		N/A	No One on Contract-Expired

1903-2003-OJT-62-1140109 Maverick, Inc. Cassie Davis 623 Perkins Street Union City, TN 38261 (731) 885-6444 Cassie.davis@coxoil.com	On-the-Job Training: 03-01-19 to 03-01-20	Scheduled: 12-10-19	Site Visit: 12-10-19 Fiscal:		N/A	Letter Mailed:
1908-2007-OJT-45-2394155 ECM of Ridgely, LLC 3145 Chandlers Mill Road Ridgely, TN 38080 (731) 264-5316 Gabrielle Readenour greadenour@rettexpress.com	On-the-Job Training: 08-09-19 to 07-30-20	Scheduled: 09-06-19	Site Visit: 09-06-19 Fiscal: 11-25-19		N/A	Letter Mailed: 11-25-2019
1904-1909-OJT-62-0537961-CB Ford Construction, Inc. Lisa Keeling, HR Manager 1311 East Court Street Dyersburg, TN 38024 (731)285-5185 lisa.keeling@fordcc.com	On-the-Job Training 04-17-19 to 09-30-19	Scheduled:	Site Visit: Fiscal:		N/A	No One on Contract-Expired
Center Point Business Solutions, LLC 1902-1912-OJT-45-4987992-CB 1413 South Home Street Union City, TN 731.885.4810 Kim Watts, Chief Operation Officer kim.watts@cpbsllc.com	On-the-Job Training: 02-22-19 to 12-15-19	Scheduled: 08-14-19	Site Visit: 08-14-19 Fiscal: 11-04-19		N/A	Letter Mailed: 11-06-2019
RFP CONTRACTACTS						
1909-2009-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: 09-16-19 to 09-30-20	Expires: 09-30-2020	Fiscal:		Invoices Checked Monthly per Executive Director	Responses are sent monthly
1910-2009-CSP-62-0800930-MULTI Dyersburg State Community College 1510 Lake Road Dyersburg, TN 38024 Dr. Karen Bowyer, Prisdent	Career and Business Services	ates: 10-01-2019 to 06-30-20	Fiscal:		Invoices Checked Monthly per Executive Director	Responses are sent monthly
INCUMBENT WORKER TRAINING						

1903-1907-IWT-06-1760696-CB KMI Group, Inc. Attn: Kevin Vakili, CEO 320 Main Street Kenton, TN 38233 (731) 749-8700 kevin@kmlgroup.com	Incumbent Worker	Expires: 07-31-2019	Fiscal: 07-08-19 and 10-28-19			Letter mailed: 10-29-19
1904-1907-IWT-05-041438-CB Nortek Global HVAC, LLC Attn: Aaron Tiede, Diretor of Opeations 2800 Hoff Road Dyersburg, TN 38024 (731) 288-3216 Jonathan.Ballentine@nortek.com	Incumbent Worker	Expires: 07-31-2019	Fiscal: 10-25-19			Letter mailed: 10-28-19
1907-1907-IWT-03-0364162-CB NSK Steering Systems of America Attn: Donald Renfroe, Opeations Manager 2962 Ft. Hudson Road Dyersburg, TN 38024 renfroed@nssa.nsk.com (731) 288-3824	Incumbent Worker: 07-03-19 to 07-31-19	Expires: 07-31-2019	Fiscal: 10-29-19			Letter Mailed: 11-08-19
1908-1908-IWT-81-5319386-CB Allergy Lab Solutions, LLC Matthew Bane, Owner 118 Hidden Hill Cove Martin, TN 38237 (845) 820-0057 mattb.als@outlook.com	Incumbent Worker: 08-12-19 to 08-25-19	Expires: 08-25-19	Fiscal: 10-08-2019			Letter Mailed: 10-09-2019

PY19 Q2 WIOA Core Performance Measures, Estimated Results

Adult Performance Measures (323 Exiters, 597 Served)	Goal	Actual	Difference from Goal	% of Goal Met
Employment Rate 2nd Quarter after Exit	86%	90.4%	4.4%	105%
Employment Rate 4th Quarter after Exit	85%	90.3%	5.3%	106%
Median Earnings 2nd Quarter after Exit	$6,500.00	$6,602.49	$102.49	102%
Credential Attainment within 4 Quarters after exit	59%	88.3%	29.3%	150%
Measurable Skills Gains	Baseline	65.7%	n/a	n/a

Dislocated Worker Performance Measures (45 Exiters, 74 Served)	Goal	Actual	Difference from Goal	% of Goal Met
Employment Rate 2nd Quarter after Exit	84%	87.9%	3.9%	105%
Employment Rate 4th Quarter after Exit	84%	88.4%	4.4%	105%
Median Earnings 2nd Quarter after Exit	$6,842.00	$7,652.00	$810.00	112%
Credential Attainment within 4 Quarters after exit	69%	84.8%	15.8%	123%
Measurable Skills Gains	Baseline	61.5%	n/a	n/a

Youth Performance Measures (105 Exiters, 186 Served)	Goal	Actual	Difference from Goal	% of Goal Met
Employment Rate 2nd Quarter after Exit	79.5%	84.2%	4.7%	106%
Employment Rate 4th Quarter after Exit	76%	92.0%	16.0%	121%
Credential Attainment within 4 Quarters after exit	72%	80.0%	8.0%	111%
Measurable Skills Gains	Baseline	64.4%	n/a	n/a

1/8/2020

FINANCIAL STATUS REPORT FOR MONTH ENDING 12/31/2019								
AS OF DATE	CONTRACT BUDGET 12/31/2019	CUM. EXPENSE 12/31/2019	CURRENT MO ACCRUALS 12/31/2019	TOTAL EXP/ACCR 12/31/2019	OBLIGATIONS 12/31/2019	TOTAL EXP ACCR & OBLG 12/31/2019	DEOBLIGATED FUNDS 12/31/2019	UNOBLIGATED BALANCE 12/31/2019
FORMULA PROGRAM FUNDS				invoiced not pd	July-Jan 18 not pd			
ADULT OPERATIONS	$ 854,403.46	$ 511,280.78	$ 2,983.81	$ 514,264.59	$ 126,960.04	$ 641,224.63	$ -	$ 213,178.84
ADULT PARTICIPANT	$ 501,016.91	$ 558,891.06	$ 17,269.85	$ 576,160.91	$ 82,828.68	$ 658,989.59	$ -	$ (157,972.68)
ADULT TOTAL	$ 1,355,420.37	$ 1,070,171.84	$ 20,253.66	$ 1,090,425.50	$ 209,788.72	$ 1,300,214.22	$ -	$ 55,206.15
PERCENTAGE PARTICIPANT	36.96%	52.22%	85.27%	52.84%	39.48%	50.68%	#DIV/0!	-286.15%
PERCENTAGE EXP/OBLG						96%		
DSLWK OPERATIONS	$ 697,775.85	$ 436,272.65	$ 35,878.75	$ 472,151.40	$ 231,904.57	$ 704,055.97	$ -	$ (6,280.12)
DLSWK PARTICIPANT	$ 465,183.90	$ 165,860.90	$ 12,488.13	$ 178,349.03	$ 39,215.12	$ 217,564.15	$ -	$ 247,619.75
DSLWK TOTAL	$ 1,162,959.75	$ 602,133.55	$ 48,366.88	$ 650,500.43	$ 271,119.69	$ 921,620.12	$ -	$ 241,339.63
PERCENTAGE PARTICIPANT	40.00%	27.55%	25.82%	27.42%	14.46%	23.61%	#DIV/0!	102.60%
PERCENTAGE EXP/OBLG						79%		
YOUTH OPERATIONS	$ 632,736.60	$ 468,370.20	$ 14,375.93	$ 482,746.13	$ 137,394.54	$ 620,140.67	$ -	$ 12,595.93
YOUTH PARTICIPANT	$ 632,736.60	$ 353,069.56	$ 13,284.43	$ 366,353.99	$ 166,295.62	$ 532,649.61	$ -	$ 100,086.99
YOUTH TOTAL	$ 1,265,473.20	$ 821,439.76	$ 27,660.36	$ 849,100.12	$ 303,690.16	$ 1,152,790.28	$ -	$ 112,682.92
PERCENTAGE PARTICIPANT	50.00%	42.98%	48.03%	43.15%	54.76%	46.21%	#DIV/0!	88.82%
PERCENTAGE EXP/OBLG						91%		

FORMULA PERCENTAGES

TOTAL FORMULA OPERATIONS	$ 2,184,915.91	$ 1,415,923.63	$ 53,238.49	$ 1,469,162.12	$ 496,259.15	$ 1,965,421.27	$ -	$ 219,494.64
TOTAL FORMULA PARTICIPANT	$ 1,598,937.41	$ 1,077,821.52	$ 43,042.41	$ 1,120,863.93	$ 288,339.42	$ 1,409,203.35	$ -	$ 189,734.06
TOTAL ALL FORMULA	$ 3,783,853.32	$ 2,493,745.15	$ 96,280.90	$ 2,590,026.05	$ 784,598.57	$ 3,374,624.62	$ -	$ 409,228.70
PERCENTAGE PARTICIPANT	**42.26%**	**43.22%**	**44.71%**	**43.28%**	**36.75%**	**41.76%**	**#DIV/0!**	**46.36%**
PERCENTAGE EXPENDED /OBL				**68.45%**		**89.18%**	**0.00%**	
YOUTH OUT OF SCHOOL	$ 1,223,757.84	$ 781,379.75	$ 26,005.01	$ 807,384.76	$ 291,636.47	$ 1,099,021.23		$ 124,736.61
PERCENTAGE OUT SCHOOL	**96.70%**	**95.12%**	**94.02%**	**95.09%**	**96.03%**	**95.34%**		
YOUTH WORK EXPERIENCE	$ 253,094.64	$ 349,055.93	$ 17,427.69	$ 366,483.62	$ 129,591.66	$ 496,075.28		$ (242,980.64)
PERCENTAGE WORK EXP	**20.00%**	**42.49%**	**63.01%**	**43.16%**	**42.67%**	**43.03%**		
OTHER FUNDS								
CONS. BUSINESS	**$ 527,778.00**	**$ 527,778.00**	**$ -**	**$ 527,778.00**	**$ -**	**$ 527,778.00**		**$ -**
STATEWIDE / NATA	**$ 493,242.00**	**$ 2,134.77**	**$ -**	**$ 2,134.77**	**$ 390,911.60**	**$ 393,046.37**	**$ -**	**$ 100,195.63**
RESEA	**$ 310,165.00**	**$ 106,022.20**	**$ 15,717.10**	**$ 121,739.30**	**$ 113,018.02**	**$ 234,757.32**	**$ 7,801.07**	**$ 67,606.61**
TOTAL OTHER FUNDS	**$ 1,667,017.16**	**$ 635,934.97**	**$ 15,717.10**	**$ 651,652.07**	**$ 608,267.12**	**$ 1,259,919.19**	**$ 7,801.07**	**$ 399,296.90**
TOTAL PROG FORMULA/OTHER	$ 5,450,870.48	$ 3,129,680.12	$ 111,998.00	$ 3,241,678.12	$ 1,392,865.69	$ 4,634,543.81	$ 7,801.07	$ 808,525.60
ADMINISTRATION	$ 526,352.18	$ 267,867.84	$ 426.46	$ 268,294.30	$ 4,404.47	$ 272,698.77	$ 2,530.56	$ 251,122.85
TOTAL ALL FUNDS	$ 5,977,222.66	$ 3,397,547.96	$ 112,424.46	$ 3,509,972.42	$ 1,397,270.16	$ 4,907,242.58	$ 10,331.63	$ 1,059,648.45
	$ -			$ (398.16)				
PARTICIPANT % ALL FUNDS								
TOTAL FORMULA OPERATIONS	**$ 2,184,915.91**	**$ 1,415,923.63**	**$ 53,238.49**	**$ 1,469,162.12**	**$ 496,259.15**	**$ 1,965,421.27**	**$ -**	**$ 219,494.64**
TOTAL FORMULA PARTICIPANT	**$ 1,598,937.41**	**$ 1,077,821.52**	**$ 43,042.41**	**$ 1,120,863.93**	**$ 288,339.42**	**$ 1,409,203.35**	**$ -**	**$ 189,734.06**
CONS. BUSINESS-IWT	**$ 259,623.62**	**$ 259,623.62**	**$ -**	**$ 259,623.62**		**$ 259,623.62**		
CONS. BUSINESS-OJT / RA	**$ 268,154.38**	**$ 268,154.38**	**$ -**	**$ 268,154.38**	**$ -**	**$ 268,154.38**	**$ -**	**$ -**
STATEWIDE / NATA	**$ 493,242.00**	**$ 2,134.77**	**$ -**	**$ 2,134.77**	**$ 390,911.60**	**$ 393,046.37**	**$ -**	**$ 100,195.63**
TOTAL FORMULA-CB-RR-RAMP	**$ 4,804,873.32**	**$ 3,023,657.92**	**$ 96,280.90**	**$ 3,119,938.82**	**$ 1,175,510.17**	**$ 4,295,448.99**	**$ -**	**$ 509,424.33**
TOTAL PARTICIPANT- CB - RR	**$ 2,360,333.79**	**$ 1,348,110.67**	**$ 43,042.41**	**$ 1,391,153.08**	**$ 679,251.02**	**$ 2,070,404.10**	**$ -**	**$ 289,929.69**
PERCENTAGE PARTICIPANT	**49%**	**45%**	**45%**	**45%**	**58%**	**48%**	**#DIV/0!**	**57%**

*Prior Year Accruals Not Excluded

ATTACHMENT 1: Minimum Participant Cost Rate Calculations by Program Year

MPCR Calculation Methodology:

A. Total Qualifying Expenditures = sum of all allowable WIOA funded services by program as identified Section A and B of MPCR policy
B. Total Cumulative Expenditure = Total Cumulative Program Expenditures (as reported on the relevant Monthly Expenditure Report)
C. MPCR by Program = Total Qualifying Expenditures divided by Total Cumulative Expenditure

Notes:

1. Per State policy the MPCR calculation excludes obligations and the reserve for Local admin costs
2. MPCR is based on the combined formula fund totals not the individual program totals
3. the relevant data is the be keyed into the input cells (orange colored cells only)

MPCR Threshold	40.0%

Program	Funding Type	Program Year 2019 Quarter End Monthly Expenditure Report			Program Year 2018 Quarter End Monthly Expenditure Report		
		Total Qualifying Expenditures (A)	Total Cumulative Expenditures-Program (B)	MPCR by Program (C)	Total Qualifying Expenditures (A)	Total Cumulative Expenditures-Program (B)	MPCR by Program (C)
WIOA Youth	PY	82,495.47	309,940.79	26.6%	88,808.12	115,099.01	77.2%
WIOA Adult	PY	0.00	102,691.13	0.0%	0.00	12,181.37	0.0%
	FY	131,333.75	317,760.40	41.3%	129,721.69	129,721.69	100.0%
WIOA Dislocated Worker	PY	0.00	61,523.72	0.0%	0.00	70,909.35	0.0%
	FY	13,249.92	54,351.42	24.4%	122,101.50	220,236.89	55.4%
RSP	FY			#DIV/0!			
SWA	PY	0.00	0.00	#DIV/0!	86,106.38	86,106.38	100.0%
				#DIV/0!			#DIV/0!
Grand Total		227,079.14	846,267.46	26.8%	426,737.69	634,254.69	67.3%
	Was the MPCR Threshold Met?			NO			YES

Two Year Summary		
Total Qualifying Expenditures	Total Cumulative Expenditures (Program Only)	Combined MPCR
653,816.83	1,480,522.15	44.16%

Dec-19

Northwest PY 2019 Budget - Revised Dec. 2019
vs. YTD Expenditures as of 12/31/19

	Budget	July - Sept. 2019	Percentage of Budget	Oct. - Dec. 2019	Percentage of Budget	PY 19 YTD Total	Percentage of Budget	Remaining Balance	
Participant Budget (40% prg)*	**$ 1,146,307.89**	$ 155,973.78	14%	$ 411,736.67	36%	**$ 567,710.45**	**50%**	$ **578,597.44**	
**Includes $248,835 in Rural/SWA Funding; an additional $331,575 in SWA Funding for participants isn't included but will be spent by 6/30/20.*						**Participant YTD =**	**40.71%**		
Operating Budget (60% prg)	**$ 1,717,139.71**	$ 429,284.93	25%	$ 429,284.93	25%	**$ 858,569.85**	**50%**	$ **858,569.85**	
IFA Expenses (including OSO)	$ 154,976.31	$ 56,961.58	37%	$ 35,390.69	23%	$ 92,352.27	60%	$ 62,624.04	$ 2,438.59 *increase on January IFA*
Career Service Provider	$ 806,282.00	$ 207,965.90	26%	$ 168,232.82	21%	$ 376,198.72	47%	$ 430,083.28	
Board / Fiscal Agent Expenses	$ 656,292.24	$ 198,437.44	30%	$ 159,716.89	24%	$ 358,154.33	55%	$ 298,137.91	$ 18,379.65 *savings anticipated by 6/30/20*
Total Operating Expenses	**$ 1,617,550.55**	$ 463,364.92	29%	$ 363,340.40	22%	**$ 826,705.32**	**51%**	$ **790,845.23**	*not yet reflected in budget*
Remaining Balance	*$ 99,589.15*	*$ (34,079.99)*	-4%	*$ 65,944.52*	*3%*	*$ 31,864.53*	*2%*	*$ 67,724.62*	
						Operations YTD =	**59.29%**		
RESEA Program Operating Budget *(10/1/19 - 6/30/20)*	**$ 174,123.75**	$ -	0%	$ 51,640.56	30%	**$ 51,640.56**	**30%**	$ **122,483.19**	

West TN & NW Proposed Targets for KPIs

Program	West TN Goal	NW Target	Q1	Q2	Q3	Q4	% of Regional Goal
Adult and Dislocated Worker New Enrollments	1,877	380	68	118	123	71	20%
Youth New Enrollments	857	107	25	47	21	14	12%
Wagner Peyser New Enrollments	9,410	2,007	606	524	440	437	21%
RESEA Co-Enrollments	170	15	3	4	4	4	9%
SNAP E&T New Enrollments	570	103	26	26	26	25	18%
TAA Co-Enrollments	34.8%	34.8%	34.8%	34.8%	34.8%	34.8%	n/a
Jobs for Veterans State Grants New Enrollments	100	25	6	6	6	7	25%
Migrant and Seasonal Farmworker New Enrollments	39	21	5	5	6	5	54%
Re-Entry New Enrollments (all partners)	707	309	77	77	77	78	44%
SCSEP -TNSCA	n/a	19	5	5	5	4	n/a
Adult Ed. - Jackson State Community College	n/a	265	107	75	41	42	n/a
Adult Ed. - Weakley County Schools	n/a	333	95	59	89	90	n/a

STATE OF TENNESSEE
DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT
220 French Landing Drive
Nashville, TN 37243
(615) 741-6642

BILL LEE
GOVERNOR

JEFF McCORD
COMMISSIONER

December 13, 2019

Winston Tompoe
Acting Regional Administrator
Employment and Training Administration
Sam Nunn Atlanta Federal Center
Room 6M12 - 61 Forsyth Street S.W.
Atlanta, Georgia 30303

Re: Compliance Review for the Title I-Youth Program

Mr. Tompoe,

During the period of August 12, 2019 through September 6, 2019, the U.S. Department of Labor, Employment and Training Administration conducted an onsite compliance review for the Title I-Youth program. The review covered policies, guidance, procedures, and knowledge of State staff and Local Workforce Development Area staff in three of the local areas.

The State received the final monitoring report dated November 15, 2019, which identified fifteen findings, six concerns, and one promising practice in Tennessee. Attached is the State's response to the fifteen findings covered in the Compliance Review for the Title I Youth Program. The State will ensure the six areas of concern are reviewed and the recommended actions are taken into consideration.

Should you have any items that need to be addressed regarding this response, please contact Kenyatta Lovett at (615) 253-1864 or Kenyatta.Lovett@tn.gov.

Sincerely,

Jeff McCord

Finding 1: Non-Compliant State Board Membership -
State CMG Indicator: 1.a.1. Strategic Planning

The State Workforce Development Board (SWDB) is not in compliance with the membership requirements under WIOA. The board has two vacancies for business representatives and a vacancy for a labor representative. The board does not meet the required 51% business majority requirement or the 20% workforce representative requirement.

The WIOA section 101(b)(1) and Training and Employment Guidance Letter (TEGL) 27-14 Attachment II describe State Board membership requirements which includes the expectation that the majority of members appointed by the Governor be those representing business, and not less than 20 percent of members are representatives of the workforce.

Required Action: The State must ensure that vacant member seats are filled to bring the SWDB into compliance. In its response to this report, the State must submit SWDB meeting minutes reflecting the appointment of the required members and an updated membership list, including identification of the required categories that each member represents.

State Response: State has provided minutes on November 8, 2019 reflecting the appointment of the required members of the TN State Workforce Development Board and an updated membership list (see attachment A & B).

Finding 2: Required Statewide Activities Not Fulfilled -
State CMG Indicator: 1.c. Products & Deliverables

The State is not fulfilling all required youth related statewide activities. Specifically, the state is not disseminating the list of eligible providers of youth activities or providing additional assistance to local areas with high concentrations of eligible youth. The State reported to previously post the youth providers, however during the time of this review the list is still not available or posted publicly.

While the State has a mechanism for local areas to request additional funding, no evidence was provided to demonstrate that high concentrations of eligible youth are being assessed or provided additional assistance by the State.

20 Code of Federal Regulations (CFR) §682.200 outlines the required and allowable statewide employment and training activities. Such required activities include: §682.200(b)(6) "Disseminating by various means... A list of eligible providers of youth activities as described in WIOA sec. 123..." and §682.200(k) "Providing additional assistance to local areas that have a high concentration of eligible youth... "

The State underwent major changes during a recent re-designation of 13 LWDAs into 9 LWDAs in October 2018, which may have impacted the previous eligible youth providers list

and posting thereof. However, a full year later, this requirement remains incomplete.

Required Action: The State must develop and implement strategies, policies, and/or procedures necessary to ensure compliance with all required youth-related statewide activities. The State must submit documentation that demonstrates that these required statewide activities have been established and implemented.

Furthermore, it is recommended that the State establish a mechanism for leadership and the SWDB to understand, track progress, and be fully aware of the fulfillment of required statewide activities along with SWDB responsibilities. This mechanism for ongoing assessment of progress or fulfillment of responsibilities will help ensure that all activities and projects funded with statewide reserve funds can be fully-informed, data-driven, and in alignment with WIOA requirements.

State Response: The list of providers was posted online (https://www.tn.gov/workforce/jobs-and-education/services-by-group/services-by-group-redirect/youth-services.html) September 27, 2019. State will evaluate and implement a policy that supports workforce areas with high concentrations of eligible youth. State intends policy to go before SWDB in May 2020 for recommendation and approval. The policy will include the following directions for local areas:

- How to apply for additional statewide funding
- Establishing a framework for data requirements; and
- Clarifying the expected outcomes

Finding 3: SWDB Criteria for Selection of Youth Providers not provided to LWDAs - State CMG Indicator: 1.b. Implementation

The State has not provided complete guidance to the LWDAs with regards to criteria to be used by LWDBs in awarding grants for youth workforce investment activities or with regards to the provider selection process. In the state plan, the State's criteria to be used by the local boards in awarding contracts for the youth workforce investment activities provides some general requirements; however, this guidance is neither provided nor further explained in the State's Career Service Provider Policy or Procurement Guidance. The policies do not provide youth specific information, including the SWDB criteria, and none of the guidance provides language related to termination of contracts.

Furthermore, upon reviewing three LWDAs, the quality of the scoresheets varied. Also, it was not clear in any of the LWDAs that the scoresheet sufficiently ensured the required WIOA program framework or services, or that it fully aligned with the SWDB criteria. The youth service provider contracts for two LWDAs provided minimal or no detail for the specific youth services or requirements. Also, the contracts were not clear on the

responsibilities of the service provider, or were vague on how the services would be delivered. One local area provided more program service detail, however it included inaccuracies in the actual 14 element descriptions.

WIOA sec. 102(b)(2)(D)(i)(V), further reinforced by OMB's ICR 1205-0522 and TEGL 6-17, requires the state plan to include: "with respect to youth workforce investment activities authorized in section 129, information identifying the criteria to be used by local boards in awarding grants for youth workforce investment activities and describing how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) in awarding such grants..." Additional information and requirements for the selection and determination of youth providers can be found at WIOA sec. 107(d)(10)(B) and TEGL 21-16. 20 CFR 681.420 describes how the LWDB must design the youth program and 20 CFR 681.460 lists the required 14 program elements.

Of the three WIOA programs, the youth program underwent the greatest changes, in quantity and content, from the Workforce Investment Act predecessor. These changes, and the broad and varied services provided specifically for the youth program must be taken into account in regards to program design and service delivery for a successful, effective program that meets WIOA requirements and intent. While TDLWD policy requires LWDBs to procure service providers for all participant services, the program design is the responsibility of the LWDBs. The LWDBs must understand how to structure procurement strategies to support program design and ensure that their procurement actions are compliance with WIOA requirements and the SWDB criteria.

Required Action: The SWDB must reevaluate the youth program design and service delivery requirements, provider selection criteria, and related youth policies for the statewide workforce system. The state must edit existing policies or further develop and disseminate more specific criteria to be used by the local boards in the provider selection process. Procuring, awarding, and terminating contracts for the youth workforce development activities must be included to address different requirements of the program such as the fourteen elements, various potential providers, and the providers' accountability and performance.

States Response: The State will add the required language regarding procuring, awarding, and terminating contracts of youth service providers. This policy is expected to go before the State Workforce Board in May 2020 for approval. The State will also clarify the criteria for local boards regarding the selection and awarding contracts in the upcoming State Plan, due March 2020. By June 30, 2020, the State will have policy implemented that addresses deficiencies.

The State will reevaluate the current Youth Program design, and hold listening forums

to include input from community organizations, partners, students, parents, educators and other appropriate stakeholders. By conducting these listening forums it will allow the local area and the State to hear first-hand the needs, recommendations, and missing elements (partners) for the specific area. The information gathered from this activity will guide the long-term strategy for the State's implementation of youth programming.

The State will also outline the importance of competitive and open procurement process, awarding, onboarding, and evaluating services providers in policy, which will be supported by proving formal training to local board staff. This effort will standardize the expected service delivery levels across the local workforce boards to meet the State's performance goals.

Finding 4: LWDA MOUs Missing Required Information-NM LWDB, NW LWDB, SE LWDB
CMG Indicator: 1.a.3. Service Design

The LWDB's MOUs for all required partners are missing required information regarding the description of services to be provided, methods for referring individuals, and methods to ensure the needs of workers, youth, and individuals with barriers to employment.

20 CFR sections 678.500(1),(3), and (4) identify the MOU requirements of service descriptions, methods for referring individuals, and methods to ensure that the needs of workers, youth, and individuals with barriers to employment are addressed. 20 CFR 678.400 identifies the following as required partners: WIOA Title I Adults, Dislocated Worker, Youth, Job Corps, YouthBuild, Native American Programs, and Migrant Seasonal Farmworker Programs; WIOA Title III Wagner Peyser Act; WIOA Title II Adult Education and Family Literacy Act; WIOA Title IV Vocational Rehabilitation Program; Senior Community Service Employment Program; Carl D. Perkins and Technical Education Act Career and Technical Education Programs; Trade Adjustment Assistance, Jobs for Veterans State Grants programs; Community Services Block Grant; Housing and Urban Development; State Unemployment Compensation laws; Second Chance Act; and Temporary Assistance for Needy Families. Lastly 20 CFR 678.420(c) indicates that each required partner must enter into an MOU with the LWDB relating to the operation of the one-stop delivery system.

While the MOUs may meet minimum requirements, the content, descriptions, tables, and required information is not provided for all partners. Specifically, although not exclusively, the following information is missing: WIOA Title I Youth, Carl D. Perkins and Technical Education Act, and Unemployment Compensation programs.

While the local plan is intended to identify and outline the vision, strategies, policies, procedures, and local activities planned for the local area, the MOU establishes the agreement of all required partners in support of the local plan in order to carry out and fulfill the local plan. Without

complete and thorough information in the MOU, the LWDA cannot ensure that all required partners clearly understand their role, how all partners will collectively provide services together, or confirm that the partners will provide services as required by WIOA.

Additionally, the LWDAs youth program design may benefit from agreements with other optional partners. This may help the local area to provide all 14 element-related services. It could also help them to provide the full menu of services needed by participants in order to increase credential attainment or employment, retention, and earnings of the participants. Leveraging other partner programs and co-enrolling eligible participants provides LWDAs with an opportunity to ensure access to and provision of beneficial, comprehensive services to WIOA youth participants, and facilitates accurate and complete data entry for all services provided across the multiple providers.

In all three local areas, while the youth program may have referred individuals to some partner agencies for services, there were no formal agreements with such youth partners, no formal description of services, or confirmation of how the partners would coordinate and collaborate, including sharing of participant service data. Without a formal agreement and delivery structure among partners, the case managers are unable to fully document and record the variety of services, specifically partner services, participants are receiving as a result of being enrolled in the WIOA program. It is recommended to include such optional partners into the scope and content of formal LWDB MOUs.

Required Action: The State must work with the local areas to amend their MOUs to include a description of services to be provided, methods for referring individuals, and methods to ensure that the needs of workers, youth, and individuals with barriers to employment are addressed for all required partners. The State must also reevaluate and modify their MOU guidance if necessary to ensure all required information is included. In its response to this report, the State must provide a copy of the amended MOUs and, if applicable, updated State MOU guidance.

State Response: The State will revise current MOU guidance and provide technical assistance to local areas in developing, amending, and implementing effective/compliant MOUs for their local areas no later than May 2020, and fully executed local MOU by June 2020. Copies of the MOUs will be provided once received by the local areas. During this timeline of revising the MOUs, the State will include the review of current guidance to determine if a policy is needed, allow policy comment period as required for state policies and update our State Workforce Board on the required implementation.

Finding 5: Required Youth Planning and Program Information not provided in Local Plans, MOUs, and Provider Contracts -NM LWDB, NW LWDB, SE LWDB
CMG Indicator: 1.a.3. Service Design

Our review shows that not all local plans provide the strategic vision for the youth program. Descriptions are not provided for the youth service delivery framework, nor how the 14 youth program elements will be made available within a framework. Rather, the local plans either indicate a network of subcontractors, or omit how the 14 elements would be made available all together. All three local plans also either provided a vague list of the potential elements and services, or did not provide any information regarding the services at all.

The MOUs do not provide any detail regarding the service delivery framework for the youth program, do not identify any additional partners for the youth program elements, nor how the partners would coordinate services to address the needs of the youth. Furthermore, the youth service provider contracts do not provide specifics on responsibilities, or details regarding the youth services or service delivery framework. In short, all three primary governance documents that should identify, relay, and confirm the service delivery framework, services, partners, and method for serving the youth are neither providing such critical information nor ensuring alignment across all parties involved.

20 CFR 679.560(a)(5) identifies that the local plan must include a description of the LWDB's strategic vision to support regional economic growth and economic self-sufficiency, to include goals for preparing an educated and skilled workforce including youth and individuals with barriers to employment. 20 CFR 679.560(b)(8) further requires the local plan to include "a description and assessment of the type and availability of youth workforce investment activities in the local area ... " 20 CFR 681.420(b) requires that the local plan describe the design framework for the youth program and how the 14 program elements are to be made available in this framework.

20 CFR 678.500 requires required one-stop partners to include a description of services provided through the one-stop delivery system in the MOU, including the manner in which the services will be coordinated and delivered through the system. It also requires methods to ensure that the needs of workers, youth, and individuals with barriers to employment, including individuals with disabilities, are addressed in providing access to services, including access to technology and materials that are available through the one-stop delivery system.

2 CFR 200.319(c) states that non-Federal entities written procurement procedures must ensure that a clear and accurate description of the technical requirements for the material, product, or service to be procured must be included in all solicitations.

In conversations with local leadership and front-line staff, the reviewer learned that some staff did not fully understand some of the 14 youth program elements and could not articulate how they would be delivered if needed. Lack of clear definition by the LWDB about the service design and the service delivery plan for the 14 elements resulted in limited understanding of the youth elements by staff. Also, this made case managers unable to appropriately address the full set of needs for youth participants. Case managers interviewed had primary working knowledge and processes for elements such as Labor Market Information, Supportive Services, and Paid Work Experiences, but had little knowledge or resources for several of the elements and thus do not utilize or refer participants for those services.

Limited use of the full array of available services indicates that service delivery options have not been effectively planned for, and/or that staff are not familiar enough with the 14 elements to properly assign or prescribe them to participants. The intent of WIOA and its corresponding regulations is to provide a full menu of options for wrap-around services to youth participants in order to meet a greater set of needs of the youth population. The lack of diversity for referrals or assignments, and the limited assignments to several critical program elements signal LWDB program design limitations that result in under-utilization of contracted youth providers and the possibility of a reduced scope of services/assistance for participants.

Without providing the strategic vision, service delivery framework, description of services, partners, and coordination, and clear roles and responsibilities through these three guiding documents for the youth program, it is difficult to ensure that case managers and contracted youth service providers are serving customers with the full array of services in mind, or achieving the vision of the local area and State.

Required Action: The State must work with the local areas to amend their local plans, MOUs, and provider contracts to include the required information and ensure they are in congruence with each other and with the State Plan. In its response to this report, the State must provide a copy of the amended section of the local plan, MOU, and youth service provider contracts. The State must also work with the LWDBs to ensure that all case managers and youth provider staff have a full understanding of each of the 14 youth program elements, and how each are made available, delivered and reported within the youth program service design framework. Evidence must be provided to confirm this has been done and demonstrate how it has been addressed.

State Response: The State will work with local areas to address the deficiencies in their local plans. As mentioned above, the State will work with Local Workforce Development Boards and board staff in revising local strategies to reflect the vision and outcomes in the State Plan. The State will do this by providing technical assistance, hosting listening forums, providing strategy

sessions to local boards, and creating a "peer-to-peer" model for local boards to leverage resources and training opportunities to be completed by June 2020. Tennessee is currently drafting the 2020-2023 Combined WIOA State Plan and requests that significant changes be submitted for approval at that time (March 2020) the 2020-2023 WIOA State Plan is due to the U.S. Department of Labor and Employment & Training Administration. This will allow the State to offer clear guidance and expectations to local areas as they develop their local and regional plans through policy and with customized technical assistance.

Finding 6: Not All 14 Youth Elements Made Available-NM LWDB, NW LWDB
CMG Indicator: 1.e.1. Service Delivery

The LWDAs have not identified and/or are not making all 14 program elements available to the youth participants, and are not providing participants with information about the full menu of services being available. During the review, the elements most commonly noted as missing or unavailable included: leadership development opportunities, adult mentoring, financial literacy education, or entrepreneurial skills training.

20 CFR 681.460 requires that all 14 program element services must be made available to youth participants. 20 CFR 681.420 requires that LWDBs must ensure that WIOA youth service providers provide participants with information about the full array of applicable or appropriate services available through the LWDBs or other eligible providers, or one-stop partners.

Although WIOA does not require all participants to receive all services, it does require that all participants have access to and awareness of all services. When case managers do not have the services available, which may include services provided through a partner agency or organization, or do not make participants aware of the full array of services, the LWDA has no way to ensure that the participants will receive all of the appropriate services. In practice, this is quite often a result of lack of guidance and a developed service delivery framework from the LWDBs, as observed through the local plan, MOU, and career service provider contracts. When the service delivery framework is not developed, the partners not formally arranged or identified, and details not communicated to the case managers, the case managers are often unaware of the expectations for who would provide the services, unaware of the partners who may provide the services, or unable to provide the services themselves. Thus they either do not discuss them or do not offer them regardless of the participants need for such services.

Required Action: The State must work with the LWDAs to ensure they have developed their program design, clearly articulated the service delivery framework and services through the service provider contract, and that all front line staff serving youth participants are

appropriately trained. In response to this report, the State must provide documentation to confirm the specific providers the LWDBs have identified to provide each of the 14 program element services. In addition, the State must provide evidence of guidance and training provided to front line staff and information about how all participants are informed about the full array of services available through the youth program.

State Response: State staff will work with LWDBs to amend current contracts to provide clear and explicit language regarding youth providers' responsibility to ensure all youth have access and awareness of the fourteen program elements and strengthen youth policy to ensure future compliance with the administering the fourteen youth program elements. While formal contracts and guidance are lacking in detail, current youth service providers are aware of their responsibility to make available all 14 program elements and have provided documents (see attachments C, D, & E) that are used in informing youth and that Local Workforce Development Boards are monitoring that youth providers are compliant with this requirement. Amended contracts and State developed framework are expected to be completed no later than June 2020. Further guidance will be provided to local board staff via webinar to occur no later than April 2020.

Finding 7: State has Not Defined Basic Skills Deficient- State, NM LWDB, SE LWDB CMG Indicator: 1.e. Participant Services

The WIOA youth eligibility criteria for the Basic Skills Deficient eligibility criteria is not defined by the SWDB. Furthermore, the SWDB did not deferred this to the LWDBs, and is not defined or fully defined by two of the LWDB's reviewed.

20 CFR 681.210 and 681.220 identifies that Basic Skills Deficient is one potential eligibility criteria for both OSY and In School Youth (ISY) participants. 20 CFR 681.290(a) indicates that a youth is basic skills deficient if he or she (1) has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or (2) is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society. Furthermore, it stipulates that the State or LWDB must establish its policy for 20 CFR 681.290(a)(2).

If the SWDB does not elect to establish a statewide policy for 20 CFR 681.290(a)(2), the State must clearly defer this requirement to the LWDBs and ensure that the LWDBs establish a local policy that meet the requirements of 20 CFR 681.290. The lack of a clear policy, either at the State or local level, results case managers not being able to sufficiently or appropriately determine that a youth participant is eligible when qualifying under this criteria, or they cannot determine the appropriate assessment instruments or documentation to support such qualification.

Required Action: The State must either develop a statewide policy to further define Basic Skills Deficient, as per 20 CFR 681.290(b) or defer this responsibility to the LWDBs in the State Plan. The State must then either ensure the LWDB's policy is developed or that the LWDB policy is in alignment with the State policy, and provide proof of guidance and training provided to the case managers for this clarification.

State Response: State has defined basic skills deficiency within the State youth eligibility policy. This policy was approved by the State Workforce Development Board on November 8, 2019 and is attached to this response (see attachment F). Furthermore, the State will provide guidance regarding this policy to local board staff via webinar that will occur no later than February 2020.

Finding 8: Local Area Requires Additional Assistance Policy Inconsistent with State Policy - SE LWDB,NMLWDB
CMG Indicator: 1.e. Participant Services

The WIOA youth policy for "Requires Additional Assistance" eligibility criteria for two of the three local areas reviewed is not consistent or in alignment with the State policy. The SE LWDB expanded the State's definition to include additional qualifications, thus establishing a policy which allows eligibility for youth beyond who the State has determined eligible. The NM LWDB policy is not consistent with the State policy, having different qualifications all together.

20 CFR 681.300 and 20 CFR 681.310 require either the SWDB or LWDB to establish a policy for the "requires additional assistance to enter or complete an educational program, or to secure and hold employment" criterion if using this criteria. 20 CFR 681.210 and 20 CFR 681.220 include "an individual who requires additional assistance to complete an educational program or to secure or hold employment" as an eligibility criteria for ISY and OSY.

Required Action: The State must work with the LWDBs to either revise the Requires Additional Assistance Policy of the SWDB, LWDBs, or both in order for the SWDB and LWDB policies to be in agreement. In response to this finding, the State must submit the final, revised and approved policies to confirm corrections and consistency.

State Response: The State has corrected language within the State youth eligibility policy that allowed local areas to "add to" or "strengthen" the State definition of requires additional assistance. The State youth eligibility policy was approved by the State Workforce Development Board on November 8, 2019. State will provide guidance regarding this policy to local board staff via webinar that will occur no later than February 2020. State will also provide

assistance to local boards to revise local policies with the estimated completion no later than April 2020.

Finding 9: Insufficient Monitoring for Youth Program Requirements - State, NW LWDB, NM LWDB, SE LWDB
CMG Indicator: 2.f. Subrecipient Management & Oversight

The State's grant oversight structure and processes for monitoring has changed since the last ETA monitoring review. The State does still have some key monitoring functions in place, such as an annual onsite fiscal review, performance scorecards, and quarterly desk reviews including file reviews. However, the review uncovered that, at least at this time of transition, there is very little in place for programmatic reviews to ensure local's compliance with federal statutes, regulations, and terms and conditions for the WIOA youth program, in regards to monitoring tools, plans, and processes. While the current processes cover some aspects of the program such as financial systems and processes, eligibility, and quality assurance, it does not provide a mechanism or process to review, identify, or address programmatic requirements such as the issues identified in this report.

Similarly, at the local level, the LWDBs reviewed had very few processes or systems in place for monitoring procured youth providers. Some level of fiscal oversight and case file reviews were followed at all three of the LWDAs visited, however the tools, processes, or systems to ensure youth providers' compliance with federal statutes, regulations and terms and conditions for the youth program were generally absent. Without monitoring to assess and record youth service provider compliance and performance outcomes, the local areas could not ensure that funds are being used appropriately, performance goals are being achieved, and participants are receiving the services they need as intended by the law. Furthermore, the LWDAs did not have a method to track and monitor the five percent eligibility exception for those qualifying under the "Requires Additional Assistance" criteria.

WIOA and the Uniform Guidance contains multiple references to and requirements for oversight and monitoring responsibilities. The WIOA regulations at 20 CFR 682.200(j), 20 CFR 683.220, and 20 CFR 683.410 clearly identify oversight and monitoring as a State responsibility. There is similar language related to LWDB monitoring at 20 CFR 679.370. This section indicates that the LWDB must conduct oversight of youth workforce investment activities. Oversight and monitoring is not limited to financial activities, but rather many programmatic requirements and activities lead to fiscal decisions. The multiple programmatic requirements for the WIOA youth program significantly impact the program design, service delivery, and outcomes for the program and the participants alike.

The overarching requirements for both the State and local board are covered in the Uniform Administrative Requirements at 2 CFR 200.328(a) and 2 CFR 200.331(d). These sections

require that the non-federal entity monitor its activities under Federal awards to assure compliance with Federal requirements and to ensure performance expectations are being achieved and that the non-federal entity "monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward .. . ." 2 CFR 200.318(b) also provides: "Non-Federal entities must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders."

In regards to the "Requires Additional Assistance" exception, 20 CFR 681.310(b) states: "In each local area, not more than five percent of the ISY newly enrolled in a given program year may be eligible based on the 'requires additional assistance to complete an educational program or to secure or hold employment' criterion." If using this exception and criterion as a means to qualify ISY participants, the local areas and the state must have a way to track and monitor this, similar to the five percent low income exception, and the OSY and Work Experience expenditure requirements.

Required Action: The State must ensure that its monitoring efforts meet the requirements stated above. The State must also ensure that the LWDBs establish and implement a formal program monitoring for their youth service providers. In its response to this report, the State must describe the steps it will take to ensure it conducts monitoring that is fully compliant with the requirements above, to also include programmatic monitoring. The State must provide the monitoring tool, monitoring plan, and monitoring schedule for the State's review of local areas, and the same for the LWDBs monitoring of the service providers. Moving forward, the State should ensure that the State and locals begin each Program Year (PY) with an annual monitoring plan that addresses all fiscal, programmatic, and administrative requirements.

State Response: The State will ensure it is meeting the federal monitoring requirements listed in this finding by implementing procedures to ensure all aspects of monitoring Title I Youth is being conducted. As observed, the State has procedures in place for fiscal, performance, and quarterly desk reviews. The State will begin implementing more intensive programmatic reviews by utilizing the resources provided in the *Core Monitoring Guide* and *WIOA Youth Supplement Core Monitoring Guide*. Tennessee Department of Labor and Workforce Development (TDLWD) will begin conducting on-site monitoring with the use of the *WIOA Youth Supplement Core Monitoring Guide* as a tool to determine the compliance of the Local Workforce Development Boards along with a newly created State-specific monitoring tool. These monitoring visits will be conducted in a manner that reviews all programmatic functions and provides technical assistance as needed. Prior to these on-site visits, TDLWD will begin requesting specific documents and reports from each LWDB, per the *WIOA Youth Supplement Core Monitoring Guide* and the State specific monitoring tool, to review and determine what type of review conducted during the on-site

visits. The schedule and plan will be updated and provided by June 2020 and will subsequently be included in the annually crafted monitoring guide submitted to the Tennessee Department of General Services on October 1st every year.
The newly improved monitoring processes will be introduced to all LWDAs via an in-person training to be conducted prior to June 2020. The creation of new and revised policy around Youth Program Service Design and Monitoring will require the LWDBs to follow State requirements and implement specific procedures as required of them by federal regulations. These policies will be presented to the SWDB during May 2020.

Finding 10: Local Areas Not Addressing Individuals Deemed Ineligible- NM LWDB, NW LWDB
CMG Indicator: 1.e. Participant Services

The LWDAs are not meeting the requirement to refer individuals deemed ineligible for the program for further assessment or appropriate basic skills and training programs. Through policy review and interviews with LWDA staff and case managers, it was noted that this may occur sporadically depending on the case manager, but no evidence was found that the LWDBs had provided any guidance to the providers or that it had been formally established in procedural operations with applicants or participants.

If a youth applies for enrollment in a workforce investment activities and either does not meet the enrollment requirements for that program or cannot be served by that program, 20 CFR 681.420(e) and (f) requires the eligible training provider refers the youth for further assessment if necessary or to appropriate programs to meet the basic skills and training needs of the youth. This requirement falls under the youth program service design framework required by the LWDB as per 20 CFR 681.420.

Required Action: The State must work with the LWDBs to review and evaluate their program design and ensure the LWDB has established the framework for the providers to meet this requirement. This may also need to be reflected in the local plan, contractual agreements with youth service providers, policy, procedural guidance, or monitoring tools. In response to this finding, the State must submit the applicable approved documents to demonstrate this requirement has been incorporated into the LWDBs program design framework and local operations.

State Response: While service provisions for eligible youth are addressed in local documents, guidance provided lacks the necessary detail for service provisions for non-eligible youth. State will work with local boards to address deficiencies in local documents. State will also strengthen guidance to local boards regarding youth program service design and delivery by creating a youth policy that outlines the framework of the youth program. State anticipates deficiencies to

be addressed and corrected including offering clear guidance by June 2020.

Finding 11: Local Areas Determining Youth Participation Based on Age- SE LWDB, NM LWDB, NW LWDB
CMG Indicator: 1.e.3. Eligibility/Enrollment

The LWDAs reviewed demonstrated that they are making program enrollment decisions primarily and often solely based on age rather than the service needs of the participant. In some cases, the first and only question asked to a youth upon entering the AJC is their age, after which they are either sent to the youth or adult case manager depending on the answer provided.

WIOA not only encourages the LWDBs to consider the benefit of serving a youth in the youth program versus the adult program, but it also allows for the youth to be co-enrolled in both programs if appropriate and beneficial . For those who choose not to co-enroll, however, 20 CFR 681.440 states that a local program must determine the appropriate program for the participant based on their service needs and if the participant is career-ready based on an assessment of their occupational skills, prior work experience, and employability . Thus, the determination as to which program the youth is enrolled must be based on the service need of the individual.

When observed in the field, this finding can be the result of a variety of program design or service delivery issues: a lack of availability of the 14 youth program element services and thus no clear distinction between the adult and youth programs; case managers' lack of understanding that the full menu of services is available; a lack of effective individual service need assessment to determine the most appropriate program or mixture of co-enrolled program services; or the lack of clear operational procedures for case managers to guide or ensure the eligibility and assessment activities are meeting requirements of WIOA. While there are often some similarities to the services available in the two programs, there are some differences as well. For example, an individual enrolled in the ISY between the ages 18-21 could pursue occupational skills training requiring an Individual Training Account for which the ISY program does not allow, whereas the Adult program does. Thus, the most appropriate program must be determined by the individual needs, knowledge, skills, and interests as required in WIOA.

Required Action: The State must work with the LWDAs to determine the cause(s) of this finding and an effective solution to both meet the requirements and most appropriately serve the individual based on need. As noted in the preamble, ETA does not intend to require local WDBs to establish specific processes to ensure that individuals are served in the appropriate program, but LWDBs need a process in place to assist in determining the appropriate program for participants between the ages of 18 and 24. In response, the State

must provide documentation to confirm actions taken by the State and LWDBs to address and resolve this finding.

State Response: The State issued guidance to local development boards on May 8, 2017 on utilizing initial assessments within the American Job Centers. Guidance instructs local boards to create guidance and/or policy around how the initial assessment will be utilized in service delivery in the specific workforce area. The initial assessment is designed to assess the service needs of the participant and determine if the participant is career-ready, based on their occupational skills, prior work experience, and employability. Please find attached the initial assessment guidance issued by the State and the guidance and/or policy for each of the local areas that were reviewed (see attachment G). Also attached, please find the State's actions to address this deficiency (see attachment H). The State intends to strengthen current guidance for utilizing initial assessment and anticipates this to be completed by June 2020.

Finding 12: Work Experience Activities Do Not Include Occupational and Academic Components
- NM LWDB, NW LWDB, SE LWDB CMG
Indicator: 1.e. Participant Services

Work experience services provided to youth program participants do not include the required academic and occupational education components. Two of the local areas presented a work experience training plan which attempts to potentially identify academic skills or knowledge which would be required for the work experience position; however, there was no evidence that this document was completed consistently nor include a training plan or education activities to be undertaken by the participant to address the academic needs.

In some cases, the documentation for the specific occupational skills or occupational skill training required for the work experience position was also absent or incomplete. For both the academic and occupational components, the LWDBs had not clearly established a framework, understanding of, or documentation requirements for these work experience service requirements. Through case manager interviews, the reviewer learned that work experiences were often extended by case managers based on an opinion or request from the employer or due to no permanent employment position becoming available for the participant rather than based on the specific academic and occupational skill training need of the individual. The establishment and implementation of a structured, consistent training plan for each work experience, similar to those utilized with On-the Job Training opportunities, would clearly demonstrate and justify the decision for the most appropriate work experience for the participant's career pathway and ISS; the fulfillment of the academic and occupations skill training components; and the length of the work

experience.

20 CFR 681.600 states that work experiences are a planned structured learning experience that takes place in a workplace for a limited period of time.Work experiences provide the youth participant with opportunities for career exploration and skill development. Work experiences must include academic and occupational education. 20 CFR 681.460 clarifies that the specific program services provided to the youth participants are based on each participant's objective assessment and individual service strategy, and 20 CFR 681.420 requires the ISS to identify the participant's career pathways.

Required Action: The State must work with the LWDBs to review, assess, and revise their program design framework to ensure they are meeting the full requirements of the work experience program element. At a minimum, this must include the establishment of occupational and academic education components within a work experience activity and the worksite agreement or training plan to document the same. It is recommended that this review and revision also clarify the requirement for the work experience activity should be based on the participant's needs, goals, and career pathway as identified in the ISS. Documentation must be provided to confirm required changes are sufficient, completed, and implemented, including guidance or training to front line staff.

State Response: The State is currently working on strengthening the youth program framework by drafting policy that outlines service delivery and requirements for the youth program. State will work closely with local boards to ensure all components of this program element are compliant. The State intends for the policy to be completed and approved by the State Workforce Board by June 2020.

Finding 13: Lack of Alignment Between Needs Assessment, ISS, Career Pathways, and Services Provided- NM LWDB, NW LWDB, SE LWDB
CMG Indicator: 1.e. Participant Services

The LWDAs visited did not have clear evidence of formally established career pathways, requirement for youth program services to be provided in alignment with interpretation of assessments and needs identified on the ISS to include career pathways. The LWDAs have not provided guidance for front line staff to ensure services provided to participants meet these requirements. The local areas confirmed that career pathways had not been established or that no guidance had been provided. Interviews with case managers demonstrated that guidance or operational procedures were not in place to ensure services are in line with the needs and identified career pathway of the participant.

The lack of alignment between a participant's assessment results, ISS including career pathway and individual goals, and services provided makes it difficult for reviewers to

understand why any given service was provided and/or paid for with WIOA funds. Being able to demonstrate the symmetry between the objective assessment, the ISS and the actual services provided to the participant is not only the primary expectation of good case management, but it also justifies the costs associated with the services as being necessary , reasonable and allocable to the grant.

In accordance with 20 CFR 681.420, each youth participant must have an objective assessment for the purpose of identifying appropriate services and informing the ISS. It further requires that the ISS is to be based on the individual's needs, must identify a career pathway, and must include education and employment goals. The ISS then prescribes the achievement objectives and services for the participant. 20 CFR 681.460 clarifies that specific youth program services provided to a youth participant must be based on each participant's objective assessment and ISS. Furthermore, the Uniform Guidance cost principles require that costs be necessary, reasonable and allocable to the grant.

Required Action: The State must work with the LWDBs to review, assess, and revise their program design framework to ensure they are meeting the full requirements of the provision of services based on the objective assessment and ISS, to include how the services are related to the identified career pathway. Documentation must be provided to confirm required changes are sufficient, completed, and implemented, including guidance or training to front line staff.

State Response: Guidance was provided to local areas October 2018 via TDLWD's 2018 Fall WIOA Systems Training (see attachment I). Within this presentation, it is outlined how assessments and IEPs (ISS) provide the base of participant services and progress utilizing WIOA. While this information was shared and is currently accessible online through training materials on TN Department of Labor and Workforce Development website, we recognize the need to further formalize and implement this guidance in policy. The State will strengthen guidance to local boards regarding youth program service design and delivery by creating a youth policy that outlines the design that the local board should replicate. The State anticipates deficiencies to be addressed, corrected, and guided by June 2020.

Finding 14: LWDB Missing Parent and Youth Involvement in Program Design - NM LWDB, NW LWDB, SE LWDB
CMG Indicator: 1.a. Planning & Program Design

Through LWDB staff interviews, no evidence or confirmation could be provided to demonstrate that LWDBs have the involvement of appropriate parents and youth participants in the design and implementation of its youth programs. Also, LWDBs do not have a mechanism or structure in place to involve these individuals. During the review, the LWDBs were able to identify some members of the community such as other local entities

serving youth as a source for input and feedback for the local youth program design; however, their role and level of involvement in the design and implementation could not be clearly documented or confirmed.

The LWDB is responsible for assessing the needs of the youth population in the local area, determining the vision and strategies for the youth program and developing the program design framework, among other responsibilities. 20 CFR 681.420, which outlines how LWDBs must design the youth program, requires LWDBs to ensure that parents, youth participants, and other members of the community with experience relating to youth programs are involved in both the design and implementation of its youth programs. This requirement is also discussed in 20 CFR 681.650, which adds that LWDBs must also make opportunities available to successful participants to volunteer to help participants as mentors, tutors, or in other activities.

As an option, some LWDAs establish a youth committee in order to bring together community resources, support, and information in designing and implementing their youth program. Two of the three local areas do have a youth committee, however one local area's youth committee is not currently active and the other does not involve youth or parents in the committee.

Required Action: The State must work with the LWDAs to enforce the requirement for parents, youth participants, and other members of the community with experience relating to youth programs to be involved in both the design and implementation of their youth programs. The LWDBs must provide documentation of the mechanism or process they establish to incorporate this requirement into their local program design and planning for the youth program and evidence that the required individuals have begun participating.

State Response: State will work with the Local Workforce Development Boards to ensure the local board's Youth Committee understands the role of parent and youth involvement in the program design and implementation. The State plans on doing this by visiting with each local board in person and facilitating an informational session to align with the local board meetings. The State will also, ensure during reviewing of local plans there is documentation (sign-in sheets, minutes, etc.) to support the requirement of parent and youth involvement. To ensure compliance following the session, the State will review agendas and minutes from committee meetings to ensure parent and youth involvement. If it is presented that an area cannot reach a sufficient level of engagement and participation, the State will work directly with the local board to assist in developing an improvement strategy. Further guidance will be detailed in youth program service design and delivery policy. All actions detailed in this response are anticipated to occur by June 2020.

Finding 15: Lack of AJC and EO Signage-NM LWDB
CMG Indicator: 2.i. Civil Rights

The AJC Common Identifier is not located on the AJC signage for the Murfreesboro AJC location. Additionally, the same AJC location did not have the Equal Opportunity Notice adequately posted. One poster was found in the center, however it was in a location where very few, if any individuals would encounter.

20 CFR 678.900(c) requires that as of July 1, 2017 each one-stop delivery system must include the "American Job Center network" on all products, programs, activities, services, electronic resources, facilities, and related property and new materials used in the one-stop delivery system. 29 CFR 38.34 -38.38 provide the Equal Opportunity signage requirements, which must at a minimum "be posted prominently, in reasonable numbers and places, in available and conspicuous physical locations and on the recipient's Web site pages... "

Required Action: The State must work with the LWDA to enforce all signage requirements and provide evidence that such requirements have been fulfilled.

State Response: The State is working in conjunction with the Northern Middle Tennessee LWDA to address signage findings at the Murfreesboro American Job Center. State staff is currently developing AJC common identifier signage protocol to help guide local partners addressing signage concerns.

These protocols will bring the LWDA into compliance at the Murfreesboro AJC location and will also become the recommended statewide standard for AJC signage.
The initial steps involve gathering pictures of the signage at AJC locations statewide. The pictures will help state staff determine the status of the signage (see attachment J). Signage will be assessed and categorized as, "good", "adequate" or "needs improvement". Following this method, the signage finding in Murfreesboro will be rectified by June 30, 2020.

In regards to EO signage, the AJC that was visited has corrected the issue by placing "Equal Opportunity is the Law" posters at the front desk next to the check-in kiosk and in the resource room where job seekers utilize computers. These two locations mentioned previously are the two highest-trafficked areas in that AJC and the posters are visible to all who enter the building to receive services.