

Northwest TN Workforce Board American Job Center (AJC) Committee

Tuesday, May 2, 2024 – 10:00 a.m.

Milan Chamber of Commerce, 1069 Main St., Milan, TN or Zoom

Minutes

Committee Members Attending In-Person: Ted Piazza, Lori Burdine, Monica Heath, Kristy Mercer; **via Zoom:** Jimmy Williamson, Melinda Goode, Janna Hellums, Janet James, Sabra Bledsoe

Staff and Contractors Attending In-Person: Jennifer Bane, LeAnn Lundberg, Ginger Powell, Laura Speer, Erica Nance (OSO), Ashley Mayton (OSO); **via Zoom:** Lana Burchfiel, James Starnes (OSO), Connie Stewart (CSP)

Guests Attending: Tessa Kyle

Review and Approval of Minutes of 2/1/24 Meeting: Lori Burdine called the meeting to order and asked the group for comments regarding the prior meeting's minutes.

- **MOTION: Ted Piazza moved to approve the 2/1/24 minutes as presented and Kristy Mercer seconded the motion. All were in favor and the motion carried.**

American Job Center Services Report: One-Stop Operator (OSO), Erica Nance, presented the attached AJC Services Report for January-March 2024 which details AJC traffic counts, visit reasons, customer survey results, and estimated results for the quarterly Key Performance Indicator (KPI) goals. She reminded everyone that Weakley County is a specialized center and is not open 5 days a week, so visit numbers will always be lower. We are approaching our Adult/Dislocated Worker and meeting our Youth, Wagner Peyser, and Justice-Involved goals KPI goals. Off-target measures include Veterans, but anew Veteran Representative, SNAP, which has not had funding available for tuition, RESEA, since most individuals go back into the workforce and don't want to be c0-enrolled, and TAA since we don't have any new TAA enrollments. Erica also distributed an updated list of Access Points with 15 so far and a couple more pending. Erica also noted that training will be held next April for all library directors in the area to allow all libraries to serve as access points. A new monthly newsletter will also be shared.

Melinda Goode inquired about the status of the GROWWTH grant and the number of enrollments in Northwest to date. Jennifer Bane reported there have been about 70 enrollments so far in Northwest and 40 in Southwest towards the goal of 375 in each area over the entire three-year grant period. In total about 650 individuals have been enrolled across West TN. A no-cost extension has been requested since the grant start date was delayed significantly. Jennifer also reported that one of the biggest barriers for enrollments has been the required randomization component that was not known until after grants were awarded. Individuals are hesitant to complete the enrollment process if they may be randomly selected not to receive full services. Randomization will end after 750 enrollments and outreach and marketing will increase significantly at that time.

- **Workforce Services Report:** Sabra Bledsoe, NW TDLWD Business & Workforce Director, reported the AJC in Dyersburg had a successful hiring event on April 17th with 30 jobseekers, 10 of which were high school seniors. The AJCs also continue to work with Ceko Doors for a hiring event tour. AJC staff also held Mock interviews for several area high schools, and Senior Solutions is using the Dyersburg and Huntingdon AJCs on a weekly basis for onboarding.

Career & Training Services Report: Connie Stewart presented the attached Training Services Report detailing cumulative enrollments as of March by service type and county, a breakdown of Individual Training Account (ITA) enrollments by sector and provider, and total ITA investments by provider for all participants this program year. Healthcare is still the leading training sector with most participants still attending a TCAT and most funding being spent at private providers. We are currently down two Career Advisors for Dyersburg. Work Experience is still going strong. We are low on formula funding, but currently offsetting the cost of that with State Youth Employment Program (YEP) money. There have been a lot of referrals for the YEP. Several individuals received incentives for Work Experience. Crockett County is still lowest number of enrollments, so Connie is going to reach out to the high school to try to increase participation. OJT has increased over the past quarter.

Business Services Report: Ginger Powell, Deputy Director, presented the attached Business Services Report detailing the cumulative OJT contracts and enrollments as of March, the completion rate, and the breakdown of number trained by sector. OJT referrals are up, as is the average cost per participant due to higher wages. Manufacturing is still the highest sector trained. The next Virtually Speaking webinar will be held June 6th on workers compensation. Apprenticeship enrollments still need to be keyed and submitted, but all funds will be fully expended. Most all of the incumbent worker contracts ended April 30th with 317 individuals proposed to be trained. Any de-obligations will be repurposed if possible before the grant ends June 30th.

Individual Training Account (ITA) Policy Changes: Jennifer reviewed the attached ITA policy with the proposed changes indicated in red. The proposed changes provide more detail and clarification surrounding the use of ITAs and eligibility requirements. There was some discussion on how to best ensure ITAs are directly tied to in-demand occupations and how we prioritize what we fund if funding is limited. Ted mentioned the importance of hard data to back up what is approved for funding. The committee discussed considering growth in occupations as well as openings due to high turnover / replacement for certain occupations and whether the existing available workforce can meet the need. It was also noted that an appeal process for exceptions should be addressed. Jennifer Bane will work on a proposed list for the Board to review.

- **MOTION: Ted Piazza moved to approve the proposed changes to the ITA policy as presented and Kristy Mercer seconded the motion. All were in favor and the motion carried.**

Labor Force Participation Rate (LFPR) Strategic Priorities—Recruitment & Hiring: Jennifer Bane requested feedback on effective and innovative strategies and what the Board and AJCs can / should do to assist employers regarding recruitment and hiring. A major concern noted by several committee members is applicants and existing employees failing drug screens. Vaping was noted as a particular concern since individuals may not realize it can cause a failed drug screen. A webinar for jobseekers and possibly high school students was noted as a possible way to educate individuals on this issue. The committee also discussed specific outreach occurring for veterans and the need for education on financial abuse / scamming of elders. Melinda Goode shared information an upcoming conference on elder abuse.

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

Other Business: With no additional business, Ted Piazza motioned to adjourn, and Kristy Mercer seconded.

Respectfully Submitted,

Lana Burchfiel

Public Information Special

Northwest TN Workforce Board
American Job Center (AJC) Committee

Thursday, May 2, 2024 – 10:00 a.m.

Milan Chamber of Commerce
1069 S. Main Street
Milan, TN

Chair - Lori Burdine

[Join Zoom Meeting](#)

Meeting ID: 836 4761 5244

Passcode: 021334

Vice Chair – Rita Alexander

Agenda

1. Welcome and Call to Order Lori Burdine
2. Review and Approval of Minutes of 2/1/2024 meeting **(Vote Required)** Lori Burdine
3. American Job Center Services Report Erica Nance, One-Stop Operator
 - a. Workforce Services Report Sabra Bledsoe, NW TDLWD Regional Director
4. Career & Training Services Report Connie Stewart, CSP Executive Director
5. Business Services Report Ginger Powell, Deputy Director
6. ITA Policy Changes **(Vote Required)** Jennifer Bane, Executive Director
7. LFPR Strategic Priorities – Recruitment & Hiring Jennifer Bane
 - a. Effective and innovative strategies?
 - b. Target populations / underserved communities?
 - c. Skills-based requirements (nontraditional pathways / prior experience)?
 - i. Educational, credentialing, and experience requirements.
 - d. What can / should the Board and AJCs do to assist with these items?
8. Other Business All

Future Meeting Dates & Upcoming Events

Meeting / Event	Date and Time	Location
State Board Meeting (Strategic Plan Presentations)	May 17 th , 8:30 am – 12 pm	Nashville / YouTube
Limited Employer of Record Procurement Responses Due	May 24 th	https://www.tpma-inc.com/2024/04/rfp-workforce-innovations-limited-employer-of-record-eor-services/
Northwest Tennessee Workforce Board Meeting	June 4 th , 10:00 am	NW HRA / DD (Martin)/Zoom
Future Virtually Speaking Webinar	June 6 th , 9:00 am	Zoom
Remaining 2024 Committee Meetings	Thursday, 10:00 am August 1 st October 31 st	Milan Chamber of Commerce / Zoom
Remaining 2024 Board Meetings	Thursday, Sept. 5 th (w/ SW) Tuesday, December 3 rd , 10:00 am	TBD / Zoom NW HRA / DD (Martin)/Zoom

Northwest TN Workforce Board American Job Center (AJC) Committee

Tuesday, February 1, 2024 – 10:00 a.m.

Milan Chamber of Commerce, 1069 Main St., Milan, TN or Zoom

Minutes

Committee Members Attending In-Person: Ted Piazza, Lori Burdine, Monica Heath, Sabra Bledsoe, Janet James; **via Zoom:** Jimmy Williamson

County Local Elected Officials Attending via Zoom: Mayor John Penn Ridgeway

Staff and Contractors Attending In-Person: Jennifer Bane, Ginger Powell, Laura Speer, Gina Johnson, Erica Nance (OSO), Ashley Mayton (OSO); **via Zoom:** Lana Burchfiel, James Starnes (OSO), Connie Stewart (CSP)

Review and Approval of Minutes of 10/24/23 Meeting: Lori Burdine called the meeting to order and asked the group for comments regarding the prior meeting's minutes.

- **MOTION: Ted Piazza moved to approve the 10/24/23 minutes as presented and Janet James seconded the motion. All were in favor and the motion carried.**

Election of Committee Chair and Vice-Chair: Jennifer Bane reported that Rita Alexander has requested to move from the Chair to Vice-Chair position due to conflicts with other commitments. Lori Burdine has agreed to serve as Chair.

- **MOTION: Ted Piazza nominated Lori Burdine for Committee Chair and Rita Alexander for Vice-Chair. John Penn Ridgeway seconded the motion. All were in favor and the motion carried.**

American Job Center Services Report: One-Stop Operator (OSO), Erica Nance, presented the attached AJC Services Report for October-December 2023 which details AJC traffic counts, visit reasons, customer survey results, and estimated results for the quarterly Key Performance Indicator (KPI) goals. Weakley County has less visits since they are a part-time specialized center. Carroll County survey numbers are up. Janet James inquired if customers who do not indicate they are completely satisfied are able to provide feedback on the reasons for that. Erica explained the survey does offer that option and most customers who are not satisfied need specific assistance with unemployment that staff in the AJCs cannot provide. Jennifer Bane also noted that the question regarding satisfaction is not required, and it is skipped by some customers. Also, sometimes customers indicate satisfaction in the other questions and mark unsatisfied overall leading staff to believe it is in error. Ted Piazza asked about improvement of KPIs that are not on target. Jennifer noted that even though some of the goals were off target for the quarter, they are on target overall for the year. Quarterly goals are established based on historical data but may not always be accurate for the current year. Erica noted that a Veterans representative has just been hired after several months without a staff person, so we should see an increase in enrollments. SNAP E&T has been without funding and unable to enroll participants. The resource fairs in the jails should increase our Justice-Involved numbers. RESEA is still zero, but Erica said that they had a meeting yesterday to discuss raising this number, adding that RESEA numbers have declined since the program is only offered virtually. Jennifer added that there is also a very short window for capturing RESEA co-enrollments to be counted towards the KPI goal. Lori Burdine noted that not having TAA is actual good because that means no layoffs. There are only 4 or 5 who are actively enrolled, and there have not been any new enrollments in several years, so the same numbers have been counted for the KPI goal for a few years.

- **Workforce Services Report:** Sabra Bledsoe, NW TDLWD Regional Director, reported the AJCs are currently assisting CECO Door with job fairs. The AJC in Dyersburg is offering a Resume Workshop on 2/21 and a spring job fair in early March. A Reentry Resource Fair is being planned for April for Second Chance month. Programs and Operations staff are working on a Strategic Plan to continue Youth Work Experience. In addition to the new Veterans Representative, a new mobile AJC staff person has also been hired.

Career & Training Services Report: Connie Stewart presented the attached Training Services Report detailing cumulative enrollments as of December by service type and county, a breakdown of Individual Training Account (ITA) enrollments by sector and provider, and total ITA investments by provider for all participants this program year. Connie and Jenn agreed that the Work Experience numbers need to be reviewed since they may not be an accurate reflection of the enrollments since the summer youth employment program (SYEP) enrollment goal has been reached. Laura Speer mentioned that VOS was having reporting issues, so we will revisit the enrollment numbers. Connie said we are a little

behind on enrollments. We are not seeing as much traffic in the AJCs, so the Career Advisors are going to the training facilities to distribute information on our services. Youth funds are getting low and additional funds may need to be requested. Healthcare is still the leading training sector with most participants still attending a TCAT and most funding being spent at private providers. Connie also mentioned that they have received many RESEA referrals, but most are not ready to move forward with training and enrollment. Most Title I staff no longer serving RESEA customers has also impacted co-enrollments. Enrollments are also down some due to fewer on-the-job training (OJT) enrollments.

Business Services Report: Ginger Powell, Deputy Director, presented the attached Business Services Report detailing the cumulative OJT contracts and enrollments as of December, the completion rate, and the breakdown of number trained by sector. Ginger agreed with Connie's remark that OJT enrollments have slowed with less hiring / participation from current OJT contractors. Staff are looking at expanding with new companies, so hopefully this will pick up and also help enrollment numbers. We are doing some youth OJT through the SYEP. Manufacturing and skilled trades, such as HVAC and electrical, are the sectors with the highest enrollments. Virtually Speaking webinars continue to be offered quarterly with the next scheduled for March 7th. Staff continue to issue labor market reports with 24 provided this year so far. Several schools have requested information to assist with grant applications. The Apprenticeship Grant shows no enrollments or money expended, but this will change quickly once paperwork is received and processed. The funding is based on projections from employers, so it is mainly a matter of processing paperwork to expend the funds. We have until June, but by the next quarter this money will likely be spent and there is a possibility we may receive additional funds. The Consolidated Business Grant is also now fully obligated, with most training to be complete by April or May to help ensure funds are expended by the grant end date of June 30th. An additional \$70,000 was requested to be able to fund all applications received but was denied by the TDLWD. Unfortunately, these enrollments are not counted in KPI enrollments and expenditures do not count towards the required minimum participant cost rate (MPCR).

Labor Force Participation Rate (LFPR) Strategic Priorities—Fringe & Other Benefit Options: Jennifer Bane reported that one of the primary goals from the TN Department of Labor and Workforce Development (TDLWD) that we are tasked with working on is increasing the LFPR. One of the items from our May strategy session on this topic was benefit options and varying preferences by generation. Additionally, the new National Dislocated Worker Grant (DWG) focuses on assisting individuals in obtaining high quality jobs, which the grant specifies include access to employer-provided benefits. We are looking to our committee and board to share best practices or feedback of what they have learned about benefits, including traditional benefits as well as others such as flexible schedules, as well as generational differences in the workplace. Additionally, the state is developing their strategic plan, and we are working on a regional and local plan that will also focus on this. We are waiting on a report from the state on the results of the consultants' evaluation of the system and the American Job Centers structure which will also be incorporated into the plans. Committee members provided feedback on options such as incentives for attendance, flexibility in work hours such as accommodating slight changes to allow time for children to be dropped off at school or longer hours and fewer days per week, and bonuses for job performance. The importance of communication regarding scheduling accommodations and staff onboarding were also noted. The group also recognized the potential need to backfill positions as new employers begin to hire. Items that the Board and AJC staff may be able to assist with include continued work with youth and young adults to promote career opportunities, connections to training providers to facilitate specialized training, obtaining data on why individuals aren't participating in the workforce to be able to better address those issues, and offering pre-hire workshops for employers.

Other Business: Jennifer Bane reminded the group that Conflict of Interest Forms are now due.

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

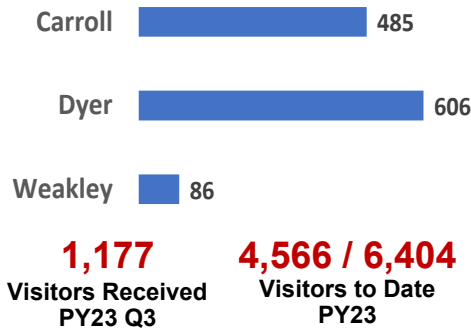
Respectfully Submitted,

Lana Burchfiel

Public Information Special

American Job Center Services

Customer Visits



AmericanJobCenter
 TENNESSEE

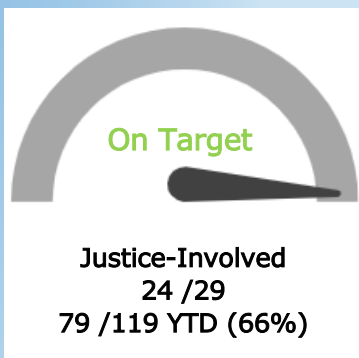
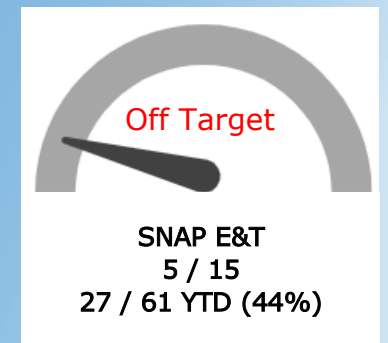
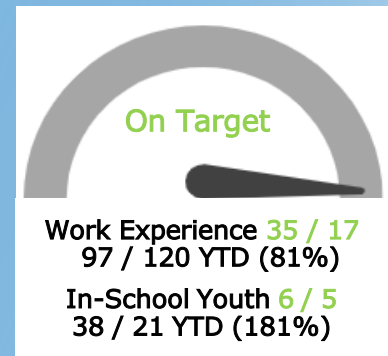
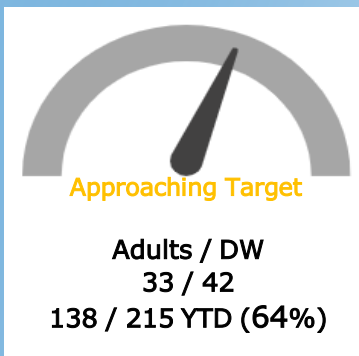


TOP 5 REASONS FOR VISIT

1. Job Search/Resource Room
2. Unemployment
3. Job Search Assistance
4. Title I Career Coaching
5. Networking Events

2,062 Services Provided

Key Performance Indicator Results



Training Services

Total Enrollments by Service

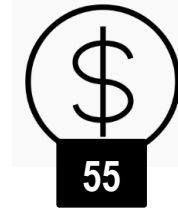
Individual Training Accounts (ITAs)



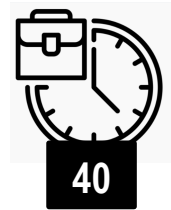
Work Experience



Youth Incentives



On-the-Job Training



National Dislocated Worker Grant

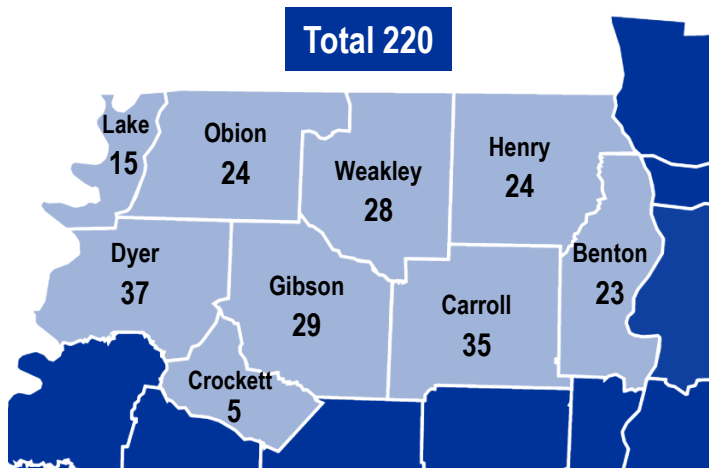


21 / 100 Enrolled

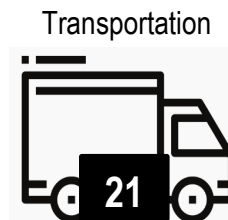
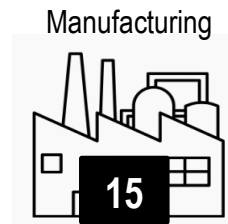


\$29,391.67 of \$615,977.62 Expended

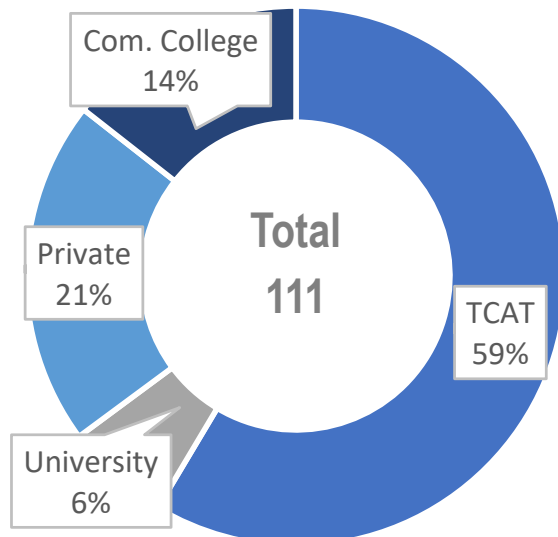
Total Enrollments by County



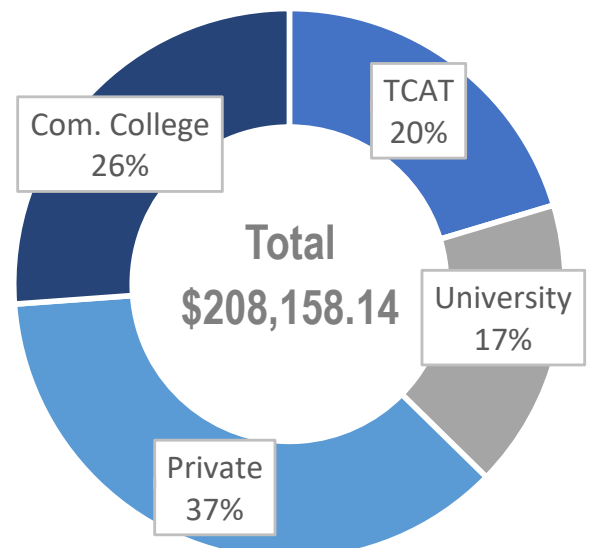
ITAs By Sector



New ITAs By Provider

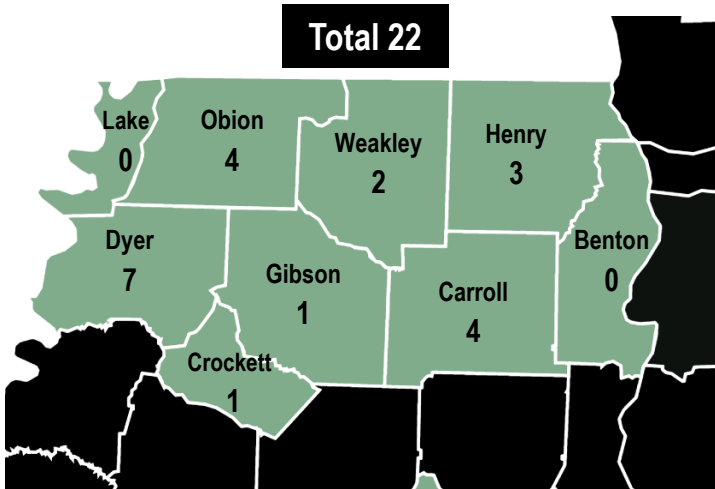


Total ITA Investment by Provider

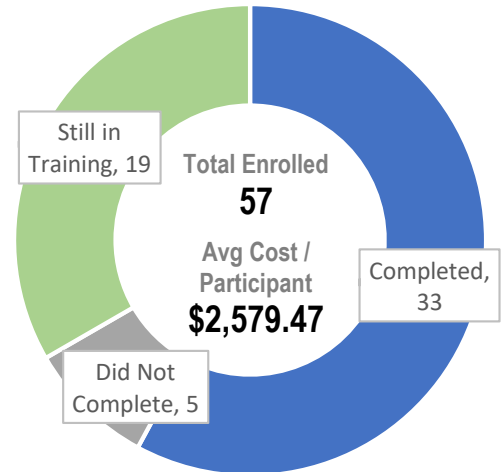


Business Services

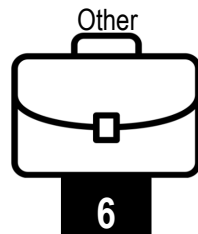
OJT Employers by County



On-the-Job Training Participants



Trained by Sector



Virtually Speaking Webinars



- ✓ Strengthening Your Talent Pipeline Using the GROWTH Program Graduates
- ✓ Work Opportunity Tax Credit: What it is and How Employers Benefit
- ✓ Funding & Training Resources for Your Business

All webinars are recorded, and may be found by scanning the QR code, or visit our YouTube page @NWSWTNAJC



Lightcast

**67 Reports
Produced**



Economy Overviews



Education Reports



Industry Reports



Occupation Reports

Apprenticeship Grant

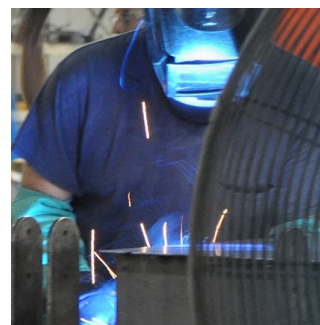


**0 / 35
Apprentices**

**\$0 of \$93,087
Expended**

Apprenticeship TN

Consolidated Business Grant



**18
Employers
Participating**

**317
Proposed
Number to Train**

**\$50,244.18
Expenditures / \$339,323**

Individual Training Account

Effective Date: ~~November 28, 2023~~ June 4, 2024

Duration: Indefinite

Purpose: To establish a policy for use of Individual Training Accounts (ITAs) for in-demand occupations with the ultimate goal of connecting eligible individuals to good (or better) jobs and, at the same time, supporting local employers in connecting to the talent they need.

Policy: The Workforce Innovation and Opportunity Act (WIOA) is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need. An Individual Training Account (ITA) voucher may be available to provide funding for WIOA eligible adults, dislocated workers and ~~out-of-school~~ youth, observing Priority of Service policies, who have completed an assessment and been determined to need in-demand occupational skills training to become gainfully employed. An ITA may be provided if the State Workforce Agency (SWA) or one-stop center staff determine, after an interview, evaluation or assessment, and career planning, that the eligible individual is:

- Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through Career Services alone;
- In need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through Career Services alone; and
- In possession of the skills and qualifications to successfully participate in the selected program of training services.

Individuals who already possess usable, marketable skills and / or credentials related to in-demand occupations with self-sufficient wages are not eligible to receive an ITA. If needed, such individuals may still receive career services including, but not limited to, job search and placement assistance, career counseling, provision of labor market information, referrals to and coordination with other programs and services, in order to obtain self-sufficient employment.

WIOA is designed to be a demand driven workforce development system. This system is supposed to provide employment and training services that are responsive to the demands of local area employers. Training services must be linked to in-demand employment opportunities in the local area or planning region or in a geographic area in which the individual is willing to commute or relocate. ITAs are prioritized for occupations determined by the local board to be in sectors of the economy that have a high potential for sustained demand or growth in the local area in accordance with WIOA sec. 134 (c)(3)(G)(iii). To ensure training recipients are receiving skills and credentials aligned with the local job market, the number of ITAs issued are directly tied to available career opportunities, particularly in target sectors, based on labor market information such as new job growth, job posting density, existing applicants / workers, turnovers, retirements, etc. For example, if data indicates a rising demand for healthcare professionals, more resources may be allocated to nursing and medical technology training programs. This targeted allocation ensures that resources are properly distributed to where they can make the most significant impact for individuals and employers.

The selection of training services should be conducted in a manner that maximizes customer choice, is linked to in-demand occupations, informed by the performance of relevant training providers, and coordinated to the extent possible with other sources of assistance. This includes tracking the skills and credentials required by employers, job placement rates, employment duration, and more to ensure that programs meet the needs of both job seekers and employers. If data shows low placement rates in specific training programs, the local board may redirect resources to more effective training programs aligned with market demand, ensuring a more strategic and outcome-focused approach to workforce development.

Per TEGL 19-16, Section 134(c)(3)(E) of WIOA, with respect to funds allocated to a local area for Adult employment and training activities, priority must be given to recipients of public assistance, other low income

individuals, and individuals who are basic skills deficient for receipt of Individualized Career Services and Training Services. Also per TEGL 19-16, Veterans and eligible spouses continue to receive priority of service for all DOL-funded job training programs, which include WIOA programs. However, as described in TEGL 10-09, when programs are statutorily required to provide priority for a particular group of individuals, such as the WIOA priority described above, priority must be provided in the manner described in the Priority of Service Policy.

The LWDB limits ITAs to programs on the WIOA Eligible Training Provider List that lead to a **WIOA-recognized credential** in a period of two years or less, including Challenge/CLEP tests, when appropriate, **and directly to in-demand occupations as described above**. ITAs may also be used to support Registered Apprenticeships (RAs), an "earn and learn" training model that combines structured learning with on-the-job training from an employer. The goal is to provide workers with advanced sets of skills that meet the specific needs of employers. Upon completion of a RA program, participants receive an industry issued, postsecondary credential that certifies occupational proficiency and is also portable (see WIOA Section 122[a][2][A]).

Many RA programs also offer interim occupational credentials that can be attained by apprentices during their program. Attainment of a credential marks an important milestone in the apprenticeship and signals that the apprentice has successfully advanced along a career pathway, increased their skills in the field, and potentially moved beyond the point of needing support from a program authorized by WIOA. Given that RAs can range from one to six years, and WIOA support for apprentices may be needed earlier in the program rather than the last two years, ITA funds may be utilized for up to two years at any point in a RA program as long as an interim credential will be earned during that period, or within the following year.

ITA funding is for unmet need for cost of training not covered by other federal or State financial aid, such as Pell, Lottery, TN Promise, and TN Reconnect. WIOA funds are considered "last dollar." ITA funding is authorized per training term (quarter, semester, trimester, etc.), with subsequent terms authorized after successful completion of the previous term. The ITA is limited to \$4,000 per year, for two years, with total cost limited to \$8,000 during participation in the WIOA program. The One-Stop Operator may file an appeal with the LWDB Executive Director for additional time/funding for the participant for extenuating circumstances that prohibit successful completion.

A Needs Assessment/Financial Aid Worksheet, identifying costs and financial aid information, and staff authorizing the ITA, must be completed prior to authorizing funding. The AJC staff should provide career guidance; however, the participant's choice for a training provider must be observed.

Funding Criteria for ITAs

The process a participant goes through to select a program of study and the process the Career Advisor follows to establish whether or not the participant is eligible for training assistance goes well beyond the process of determining if a person meets the minimum general qualifications to be determined financially eligible for WIOA. In order to make a career decision, the participant will go through a series of assessments and career exploration exercises in order to establish the appropriateness of training. Career decision making should rely heavily on the Local Labor Market Information, focusing on future job growth. If there is no local demand, then the participant must be able to establish a viable plan for relocation to an area where the occupation is in demand before training can be approved. This plan must be documented within the case narrative section and on the Individual Service Strategy (ISS).

In order for and ITA to be used to pay for training, a number of questions have to be addressed:

1. Is the program of study selected on the Eligible Training Provider List (ETPL)? Has the program been approved by the local board? Anyone seeking training Out-of-State must document that the Out-of-State provider and program is listed on the eligible training provider list of the state in which it is located **and** that the state has a reciprocal agreement in place with the Tennessee Department of Labor and Workforce Development.

- Does the program lead to a certificate as defined in TEGL 10-16, Change 1, issued on August 23, 2017? It is the policy of our Local Board to not use local WIOA training funds for refresher courses or other training which does not lead to a certificate as defined in TEGL 10-16, Change 1. Although some of these types of training may be listed on the ETPL, the Local Board has elected to not use WIOA Title I training funds for these types of programs or to re-train a person in a program for which they already possess the certificate.

Example: A person who currently holds a Class A CDL will not be eligible to receive training funds to attend a commercial truck driving training program. A person who has an active LPN license will not be eligible to receive training funds to attend an LPN training program. In both instances, the training would be considered re-training for the occupation for which they already hold the certificate and therefore, not eligible for local training funds.

- Is the program of study going to lead **directly** to a job in a documented demand occupation in the local ~~or regional~~ area?
- Is the program of study selected appropriate for the individual? Appropriateness of training should be based on assessment results. If it appears to be incongruent with the assessment results, the ISS must address and explain on what basis the career decision was made
- Is the program a Pell eligible program? If so, has the applicant/participant applied for Pell and other State Grant Awards (SEOG & TSAC)? Is the applicant/ participant potentially eligible for other sources of funding such as TN Promise, TN Reconnect, etc.?

Note: A participant may enroll in WIOA-funded training while his/her application for a Pell grant is pending. This enrollment is permitted as long as the Career Service Provider (CSP) has made arrangements with the training provider and the WIOA participant regarding allocation of the Pell grant if it is subsequently awarded. In that case, the training provider must reimburse the CSP all WIOA funds used to underwrite the training for the amount that the Pell grant covers (WIOA Section 134(c)(3)(B(ii))). Reimbursement is not required from the portion of Pell grant assistance disbursed to the participant for education-related expenses.

- After Pell, SEOG and TSAC are applied to the cost of the training, is there any unmet need remaining? If not, there is nothing the NWTNWB will pay unless the participant is eligible for supportive services which may be available, such as transportation, child care, etc.
- If Pell, SEOG, TSAC and WIOA do not cover all the costs of training, does the participant have a plan to pay for the difference? The plan to pay for all uncovered costs must be documented in the case narrative. Supporting documentation should be obtained as appropriate.

In addition to the above items, the following criteria must also be met in order for participants to be approved for, and continue to receive, funding for occupational skills training and associated supportive services:

For New Participants Only

- Potential participants must be residents of, or dislocated from an employer located in, a county located within the local service area.
- Potential participants must register in Jobs4TN or update an existing account.
- Potential participants must complete all steps of the assessment and enrollment.
- Potential participants must be currently enrolled, or accepted into, an institution and training program that is listed on the Eligible Training Provider List. ~~The Career Advisor will use the eligible training provider list for the state in which the institution is located.~~
- The training program must be linked to an in-demand occupation as determined by the Career Advisor through the use of ~~labor market information the EMSI system or other documentation as appropriate.~~
- For training programs leading to a career in an occupation requiring licensure, participants must meet the criteria outlined in the Licensed Occupations Eligibility section of this policy.

7. Potential participants must be able to complete the training program within two years. For those attending four-year institutions, they must have earned approximately 60 credit hours and / or reached junior status in order to be eligible for funding.

Note: Participants with less than 60 earned credit hours who anticipate completing training within two years must demonstrate and provide detailed documentation as to how they will complete training within the two-year period.

Exceptions: (1) In-School Youth enrolled during secondary school who transition to postsecondary training may receive travel stipends for the entire four-years at a four-year institution; and (2) ITA funds may be utilized for up to two years at any point in a RA program as long as an interim credential will be earned during that period, or within the following year.

For New and Current Participants

1. Participants must meet at least half-time enrollment criteria according to the institution and program. Up to half of participants' credit hours may be for developmental / remedial classes.
Note: For institutions / programs that do not require coursework for the summer term, a participant may still choose to take courses during this time. Participants who choose to take classes during the summer term can take any number of credit hours as long as they are still following their plan of action to graduate, and as long as they still have ITA money available.
2. Participants must be in good academic standing and maintain satisfactory progress according to the institution's policy. If the participant falls below good standing, they must return to school without funding until they get back in good standing. Once they return to good standing status, the career advisor may apply funding again.
3. Participants may only receive funding once. If participants fail or drop out of a class that has been paid for by an ITA, they must retake the class on their own, without funding, including travel.
4. Participants who drop a class, without approval from their Career Advisor, must successfully complete the next term on their own, including travel, before they can receive funding again.
5. Participants attending Pell-eligible training institutions must complete the FAFSA and CANNOT be in default on any federal financial aid (i.e. Pell grants).

Funding Criteria for Licensed Occupations

Clients being considered for licensed professional occupational training should have good prospects for finding and keeping employment in the field. Based on research of area employers, the following conditions must be met for a client to be considered for financial assistance for any unmet need for occupations that require licensure prior to employment in the field. For all Licensure Occupations an applicant should have:

1. No felony convictions for any crime in the past five (5) years. The past five (5) years is calculated from the date they were convicted of the crime. To check for felony convictions AJC Staff must check the Tennessee Bureau of Investigation Felony Offender Search website - <https://apps.tn.gov/foil/search.jsp>.
2. No sex offender registration within the last ten (10) years. To check for sex offender registry status WIOA Staff must check the National Sex Offender Search website - <https://www.nsopw.gov/en-US>.
3. No DUI convictions in the past ten (10) years.

If the conviction occurred in the most recent 5 years, but unique circumstances may allow an applicant to be successfully employed, funding may be considered on a case-by-case basis. An appeal may be filed with the Career Service Provider for consideration for funding in order to evaluate the impact of the conviction on employment opportunities in the selected occupation / field. Documentation of applicable employment opportunities must be included with the appeal.

Truck Driving Specific Requirements

1. The applicant must supply a valid Medical Examiner's Certificate of a DOT Physical (currently valid for a maximum of two years) and proof of drug screen, performed no more than thirty (30) days prior to the

date of WIOA eligibility.

2. The applicant must supply a copy of a Motor Vehicle Report (MVR) that is no more than ten (10) days prior to the date of WIOA eligibility.
3. Driver's license must not have been suspended or revoked in the last three (3) years.
4. No reckless or careless driving violation within the last three (3) years.
5. No more than three (3) moving violations in the last three (3) years.
6. No more than one (1) "at fault" accidents in the last three (3) years.

Appeal Process

When to File an Appeal

1. If an individual is denied funding for training because a staff person determines that an individual is not in need of training due to the individual being marketable, able to work in the field, and the expected wages ~~per-EMSI~~ are enough for the person and his / her family to be self-sufficient, then the individual may choose to file an appeal.
2. If the customer is ineligible to attend a training program for an occupation which requires a license, such as a truck driver, nurse, or teacher, due to restrictions in the Funding Criteria for Licensed Occupations and/or Truck Driver Specific Restrictions, the customer may choose to file an appeal.

Process to File an Appeal

If the applicant chooses to appeal a condition of eligibility, an appeal must be completed by the applicant and submitted to the Executive Director of the Career Service Provider. Appeals denied by the Career Service Provider, may be appealed to the One-Stop Operator. In the case where an applicant can provide a pre-hire letter, this is to be included with the Appeal. Any appeal recommended for approval by the Career Service Provider or One-Stop Operator must be submitted to the Executive Director of the Local Workforce Development Board for approval. The Executive Director of the LWDB has authority from the LWDB to use discretion to waive requirements of this policy for extenuating circumstances deemed to be in the best interest of the applicant and the WIOA program.

Payment of ITAs & Refund Policy

To authorize ITA funds, the Career Service Provider (CSP)'s staff members must complete a Needs Assessment and Financial Aid Worksheet to document required training costs as verified by an authorized representative of the training provider. Once the CSP staff person receives the form back from the training provider, to authorize ITA funds, if needed, he / she must enter an authorized amount, not to exceed the identified unmet need or the available ITA funds, and a voucher number generated by the electronic case management system. Training providers must utilize the completed form to request payment. Invoices are due no later than 30 days past the Term Begin Date. Prior to the submission of invoices, the institution's Financial Aid Representative will review the information provided in Needs Assessment/Financial Aid Worksheet:

1. If changes have occurred that would reduce Unmet Need (additional aid was received, student dropped hours, etc.), corrections should be made to the form and initialed by the Financial Aid Representative prior to signing. Any over payment of Unmet Need could result in audit finding for the program and the Training Provider.
2. If changes have occurred that would increase Unmet Need (book price increase, test fee left off, tuition increase after authorized, etc.), no changes will be made for this term.

If the form is accurate, it should be signed, dated and forwarded to the Account Billing Representative for the Training Provider. **NOTE: If the Financial Aid Representative fails to accurately report financial aid that the student receives, the payment to the Training Provider will be reduced by the amount not reported. It will be the responsibility of the Training Provider to collect any over payment made to the student.** The Account Billing Representative will review the information provided for accuracy and verify at least one day of attendance of registered classes prior to dispersing funds to the student and prior to billing for the ITA.

The Needs-Based Scholarship Amount Authorized should be applied to Tuition/Fees first. Remaining funds may be dispersed to the student for other costs after confirming that the student has attended all classes at least once for the number of registered hours listed in the Student Needs Assessment and Financial Aid Worksheet. If the student drops below the agreed upon registered hours prior to attending first day of class for registered hours and funds have not been dispersed, the Training Provider has an obligation to place a hold on funds and notify AJC Staff member that the Unmet Need must be recalculated/reduced. If the student drops below the agreed upon registered hours after attending the first day of class for registered hours and funds have been dispersed, the Training Provider should return any applicable refund to WIOA, but will not be held accountable for funds dispersed to the student. The student will be penalized by WIOA the upcoming semester.

Exceptions to the Use of ITAs

In accordance with TDLWD's American Job Center Individual Training Account Use guidance, Tennessee recognizes limited exceptions to the use of ITAs. Contracts for services may be used instead of an ITA only when one or more of these exceptions apply (WIOA Section 134(c)(3)(G)(ii)):

1. The services provided are OJT, customized training, incumbent worker training, or transitional jobs;
2. The LWBD determines that there are an insufficient number of Eligible Training Providers in the local area to accomplish the purpose of a system of ITAs;
3. The LWDB determines that in the area there is a training-services program of demonstrated effectiveness offered by a community-based organization or other private organization to serve individuals with barriers to employment;
4. The LWDA determines that the most appropriate training could be provided by an institution of higher education to train multiple individuals for jobs in sector-demanded occupations, provided this does not limit customer choice; or
5. The LWDA is considering entering into a pay-for-performance contract and the LWDA ensures that the contract is consistent with 20 CFR 683.510.

In order to determine the effectiveness demonstrated by a community-based organization or other private organization, particularly as it applies to the special participant population to be served, the NWTNWB will evaluate the following:

6. Financial stability of the organization;
7. Demonstrated performance in measures appropriate to the program; and
8. The relevance of the specific program to LWDA needs identified in the local area

Reference: 20 CFR 680.320(a)(3); 20 CFR 680.340(f); WIOA Section 122(d)

Related TDLWD Policy: AJC Individual Training Account Use Guidance (pages 1 and 2-3)

Vetted and Approved by the Local Workforce Development Board: ~~November 28, 2023~~ June 4, 2024

Jimmy Williamson, Chair
Northwest Tennessee Workforce Board