

Northwest TN Workforce Board American Job Center (AJC) Committee

Tuesday, February 11, 2025 – 9:00 a.m.

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

Chair- Lori Burdine, Vice-Chair- Rita Alexander

Minutes

Committee Members Attending In-Person: Ted Piazza, Sabra Bledsoe; **via Zoom:** Jimmy Williamson, Rita Alexander, Janet James, Melinda Goode

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

Guests Attending In-Person: Chris Donaldson

Welcome and Call to Order/Public Comment/: Review and Approval of Minutes of 11/6/24 Meeting: Rita Alexander called the meeting to order, mentioned the addition of new board member, Avonnti Reddick (Fast Pace Health Clinical Director, replacing JD Cantu), and asked if there were any public comments to be presented. Hearing no public comments, Rita presented the minutes from the last meeting and asked the group for any feedback or changes.

- o **MOTION: Ted Piazza moved to approve the 11/6/24 minutes as presented, and Melinda Goode seconded the motion. All were in favor and the motion carried.**

Partner Presentation-- The Mill Workspace: Chris Donaldson presented an overview of The Mill Workspace, Northwest Tennessee Entrepreneur Center. Part of the Launch TN Network since 2023, The Mill serves the same nine Northwest (NW) Counties with the mission to help businesses start and grow in Northwest Tennessee by offering business consultations, networking events, workshops, and multi-week cohorts. He mentioned the current Startup Bootcamp cohort, designed for recent startups and those in the idea phase, and hopes to partner with more Chambers to offer this course again. Roadmap to Success, an upcoming six-month cohort targeting businesses looking to scale, is now accepting applications for the April 3rd class. Chris asked the committee for help with referrals for the cohorts, as well as individuals to serve as mentors, and agencies to serve as partners for the various programs.

American Job Center (AJC) Services Report: One-Stop Operator (OSO), Erica Nance and Ashley Mayton, OSO Assistant, presented the attached AJC Services Report for October-December 2024, which details AJC traffic counts, visit reasons, customer survey results, and estimated results for the quarterly Key Performance Indicator (KPI) goals. Title I / Title III Co-Enrollments are off target, but Erica is monitoring Title I enrollments to ensure they are co-enrolled in Title III. Sabra asked if the numbers for this measure are typical. This is a new measure, and it's difficult to "catch-up" on co-enrolling participants that have been in Title I for a while. The co-enrollment percentage is much higher with new enrollments, but there are existing participants that don't make sense to co-enroll because they are preparing to exit. Janet James asked if surveys were anonymous, which Erica confirmed they are. Connie said she immediately gets a text survey from her doctor's office, and asked if we could use a similar text survey, suggesting younger participants might be more likely to utilize this. Participants would have to do a text message opt-in on intake. Erica said they mostly get the paper surveys completed currently, but there is an online option. Janet said since it looks like there is a great return rate already, if we do make any changes to the survey method, she recommended incorporating both options so our return rate doesn't suffer. Ted Piazza also asked about a trendline on survey responses, which Jennifer Bane will provide.

- Program Highlights: Erica summarized the attached American Job Center success story featuring Career Specialist, Belinda Potter and her involvement with TCAT Stanton/Blue Oval City Outreach Center. Belinda has a great relationship with all three West TN regions. An outreach event is currently being planned for April to help raise awareness of the Outreach Center. Jennifer Bane noted that over 200 individuals have been served through the Outreach Center so far. Ginger Powell spoke on the Business Services success story highlighting Rural Public Health Career Exploration Events and Manufacturing Days. Jennifer also mentioned we will be partnering with TCAT Northwest for Retail and Hospitality Career Exploration events.

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 new 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 attending a TCAT and most funding being spent on private providers. Although we have only three centers, we track enrollments by county still to ensure each county is still being served. At the beginning of each program year, Board Staff set a percentage goal for enrollments in each county. Carroll County has already exceeded its

annual enrollment goal as of January, and staff need to focus on enrollments in Benton County and Gibson County. Connie's team lost two staff members and they are currently in the process of replacing one. Enrollments in Henry County are increasing. Youth Experience enrollments are slightly down. Adult Education referrals have historically been a large part of enrollments, and those referrals dropped off this program year. Connie would like to see more Out-of-School Youth (OSY) enrollments. TCAT Henry/Carroll is probably the biggest school for new enrollments. TCAT Northwest has asked Title I staff to start coming back to orientations. Spring enrollments were low this trimester, so hopefully staff can build a relationship with new TCAT NW staff to increase enrollments in the future. We primarily served LPNs by helping with supportive services such as uniforms, travel, etc., instead of tuition since Individual Training Account (ITA) slots are limited for that occupation. University enrollments are down, but ETPL list has shrunk. Industrial maintenance still has good enrollment numbers. Truck driving is at 17 enrollments. Welding has been the biggest segment in the manufacturing sector. Enrollments look better this month, which should help with KPIs. Connie said they are still struggling to spend the Justice-involved funds due to identifying participants and figuring out how to best serve them. They are looking at transitional job sites. Ashely Mayton said she is meeting with the parole officers in Henry County to identify those who might qualify for services and this will hopefully help increase Justice Involved enrollments.

Business Services Report: Ginger Powell, Deputy Director, presented the attached Business Services Report detailing the cumulative On-the-Job Training (OJT) contracts and enrollments as of December, the completion rate, and the breakdown of number trained by sector. The Justice Involved grant will impact OJT since that grant allows for reimbursement of 75% of wages instead of 50% like we normally do. Manufacturing is still the highest sector trained. Staff are hoping to wrap up the apprenticeship grant this month or next month. We are funding a new apprenticeship at Ramm Fencing. Virtually Speaking had an episode on AI in the Workplace, and upcoming topic on March 6th will be on Hiring and Retention Trends. Staff provided 72 reports to employers, chambers, schools, etc., for labor market information.

Work-Based Training Policy Change—On-the-Job Training: Jennifer Bane reviewed proposed changes as indicated in red on the attached policy. EMSI now reflects the name change to Lightcast and the link to the State's website for Incumbent Workforce Information Training has been updated. Most changes are in the OJT section which added details about wages and the number of hours covered that have been the standard for many years but haven't been formally added to the policy. This policy applies to Title I funds, and when we receive other funding (ex. Reentry) that allows for more flexibility there may be some slight differences. A requirement that starting wages must be at least at the self-sufficiency threshold set by the Board was also added. There is also a change for work experience for in-school youth to clarify that we will allow participants who have limited availability to work longer than the typical 6-month time period, as long as they do not work more than 975 hours.

- **MOTION: Ted Piazza moved to approve the proposed changes to the Work-Based Training Policy as presented and Sabra Bledsoe seconded the motion. All were in favor and the motion carried.**

Labor Force Participation Rate (LFPR) Strategic Priorities—Job Security & Working Conditions: Jennifer Bane requested feedback on effective and innovative strategies and what the Board and AJCs can / should do to assist employers regarding job security and working conditions. The attached handout describes what is meant by "job security & working conditions" as it relates to high quality jobs according to the QUEST National Dislocated Worker Grant (DWG) and U.S Department of Commerce. Jennifer said that committee member feedback on these topics has helped provide recommendations for Virtually Speaking topics. Sabra recommended getting someone from TOSHA or other workplace regulations divisions to speak to any recent updates and requirements for employers.

Other Business: Jennifer Bane reported that the State Workforce Development Board (SWDB) has several policies currently posted for public comment that will be reviewed at the next board meeting at the end of the month. The One-Stop Design Policy would no longer require affiliate centers to be open fulltime, similar to Specialized Centers, but without the requirement of a target population. The Minimum Participant Cost Rate (MPCR) policy would now allow all state dollars to count towards the MPCR whereas currently only Federal funding counts towards this. The Grievance and Complaint policies are also being updated. Once these state policies are finalized, we will review our local policies to ensure they align. Ted Piazza asked if recent federal funding changes/insecurity have impacted us. Jennifer said not at this point. If there is a delay in the State being able to receive federal funding, then it could affect us being able to receive reimbursements from the State.

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

Respectfully Submitted, Lana Burchfiel
Public Information Specialist

**Northwest TN Workforce Board
American Job Center (AJC) Committee**

Tuesday, February 11, 2025 – **9:00 a.m.**

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

[Join Zoom Meeting](#)

Meeting ID: 817 8846 0321

Passcode: 515442

Chair - Lori Burdine

Vice Chair – Rita Alexander

Agenda

1. Welcome and Call to Order Lori Burdine, Chair
 - a. Welcome New Board Member Avonnti Reddick, Clinical Director, Fast Pace Health, (replacing JD Cantu)
 - b. Opportunity for Public Comment (limit of three minutes per speaker)
2. Partner Presentation – The Mill Workspace Chris Donaldson, Owner
3. Review and Approval of Minutes of 11/6/2024 meeting (**Vote Required**) Lori Burdine
4. American Job Center Services Report Erica Nance, One-Stop Operator
5. Career & Training Services Report Connie Stewart, CSP Executive Director
6. Business Services Report Ginger Powell, Deputy Director
7. Work-Based Training Policy Change – On-the-Job Training (**Vote Required**) Jennifer Bane, Executive Director
8. LFPR Strategic Priorities – Job Security & Working Conditions Jennifer Bane

Ensure a safe, healthy, and accessible workplace and offer job security. Minimize temporary or contractor labor solutions, using such workers mainly to adjust for short-term needs. Assess and schedule hours that are adequate and predictable.

 - a. Effective and innovative strategies?
 - b. Specific opportunities for target populations / underserved communities?
 - c. What can / should the Board and AJCs do to assist with these items?
9. Other Business All

Future Meeting Dates & Upcoming Events

Meeting / Event	Date and Time	Location
State Board Meeting	February 28 th , 8:30am – 12pm	Nashville / YouTube
Virtually Speaking Webinar	March 6 th , 9:00 am	Zoom
Northwest TN Workforce Board Meeting	March 11 th , 10:00 am	NW HRA / DD (Martin) / Zoom
Remaining 2025 Committee Meetings	9:00 am on Tuesday, May 6 th August 5 th November 4 th	Milan Chamber / Zoom
Remaining 2025 Board Meeting Dates	10:00 am on Tuesday, March 11 th June 10 th Sept. 9 th (Annual Meeting) Dec. 2 nd (with Southwest)	NW HRA / DD (Martin) / Zoom TBD / Zoom

Northwest TN Workforce Board American Job Center (AJC) Committee

November 6, 2024 – 10:00 a.m.

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

Minutes

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

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

Others Attending via Zoom: Tessa Kyle (ECD)

Welcome and Call to Order/Public Comment / Review and Approval of Minutes 8/1/24 Meeting: Lori Burdine called the meeting to order and asked if there were any public comments to be presented. Hearing no public comments, Lori presented the minutes from the last meeting and asked the group for any feedback or changes.

- o **MOTION: Ted Piazza moved to approve the 8/1/24 minutes as presented, and Jimmy Williamson 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 July-September 2024 which details AJC traffic counts, visit reasons, customer survey results, and estimated results for the quarterly Key Performance Indicator (KPI) goals. There were corrections for the AJC traffic numbers- Carroll County had 953 visitors, Dyer had 990 visitors, and Weakley County had 282 visitors, for a region total of 2,225 visitors. Weakley County traffic counts have been much higher this program year and are already halfway to their total visits for the year last program year. The increase in foot traffic has been due to an increase in customers coming for assistance with Unemployment Insurance. Erica explained that we have three KPI measures this program year- total Title I enrollments, Title I and Title III co-enrollments, and total Title III enrollments, including Veterans. The Title I and Title III Co-Enrollment KPI is new this year and the State has offered multiple training sessions for staff. There is also a strategy meeting scheduled for November 13th for the OSOs, Title III Team Leads, and other state staff to look at ways to increase co-enrollment. One access point was added during the quarter at the Martin Library. The OSO team is currently working on adding the Humboldt Library as an access point.

- o **Workforce Services Report:** Sabra Bledsoe, NW TDLWD Business & Workforce Director, reported that the Title III team is continuing with outreach events for the community. The State marketing campaign for the AJCs, Business Services, and Apprenticeship launched last month. She is also working with the Business Services Team (BST) to reimagine how we provide services to employers. The BST is working on a needs assessment for employers to gauge workforce needs and developing outreach strategies by sector. The State Special Projects Director is also working on training for Title III staff to help them be better prepared to assist with large projects such as Blue Oval City.

Career & Training Services Report: Connie Stewart presented the attached Training Services Report detailing cumulative enrollments as of September 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 & Social Assistance is still the leading training sector with most participants still attending a TCAT and most funding being spent at community colleges. The committee noted that Gibson County had seven enrollments for the quarter and asked if it was typical for enrollments to be low there at this point in the program year. Connie explained that most of their fall term enrollments were for healthcare programs located in other counties. Jennifer Bane reviewed the enrollment numbers for the first quarter of last program year, and enrollment numbers were similar in Gibson County, except there were more in-school youth (ISY) enrollments last year, most of which were for incentives. Jennifer noted that we have purposely slowed some of the incentives due to limited youth funding.

Business Services Report: Ginger Powell, Deputy Director, presented the attached Business Services Report detailing the cumulative On-the-Job Training (OJT) contracts and enrollments as of September, the completion rate, and the breakdown of number trained by sector. There were 28 OJT enrollments during the first quarter with three non-completions and three completions with an average cost per participant of about \$2,060. Manufacturing and Skilled Trades, such as HVAC and electrical, were the highest sectors trained. The next Virtually Speaking webinar will be held December 5th and will focus on AI in the Workplace. Ginger shared that we received our Apprenticeship grant funding in October, and her team is working on planning for the year, so there will be enrollments and expenditures for that grant soon. There are enough existing apprentices eligible for funding that were enrolled last program year to completely expend all funds, but there are several new apprenticeship programs that we want to assist, so her team is looking at ways to serve existing apprentices and new programs. We may lower the amount we assist with per apprentice to allow the funds to go farther and assist more employers. Staff also continue to produce Lightcast reports for employers with 17 reports produced in the first quarter.

In-Demand Occupations for ITAs (Individual Training Accounts): Jennifer Bane reviewed the attached In-Demand Criteria and Occupations list for ITAs for 2024-2027 that was approved by the board during the September 12th meeting. Since we have some new board members and there were some sound issues for Zoom attendees at the board meeting, staff wanted to ensure all board members were clear on what is included in these documents. Both documents are also posted on our website so anyone can access and review them.

Per WIOA law, ITAs must be tied to in-demand occupations. Staff have utilized similar procedures for identifying in-demand occupations for several years, but the board has now formalized this process to ensure consistency and assist Career Advisors in communicating to customers what occupations / training are approved by the Board for ITA funding, and the number approved. The In-Demand Occupation Criteria handout details the criteria used to come up with the list of approved in-demand occupations. The criteria removes any occupations that require higher training than a bachelor's degree, have less than 10 positions in the local area, are projected to have less than four new jobs in the four-year strategic planning period, have median wages less than \$14.48 (the self-sufficiency threshold), do not align with our regional priority sectors, and do not have related post-secondary training opportunities in the area. These criteria will also be used to assess any new program applications for the Eligible Training Provider List (ETPL) to ensure consistency for all training providers and programs. The handout of approved in-demand occupations shows the number of ITAs to be funded per year in the blue column. Jennifer stated that the approved in-demand occupations list is not exhaustive of every occupation that may be considered in-demand or have a need, but since we have limited funding, we need to make sure we are focusing on occupations that have the highest demand and need in our area. Jennifer informed the AJC committee members that the Outreach & Opportunities Committee would be using the In-Demand Criteria to review the current NW ETPL to ensure that all programs on the ETPL align with the requirements, further ensuring consistency and clarity. If all ITA slots for a particular occupation are met, participants that do not receive ITAs will still have access to all other applicable supportive services such as transportation assistance, books, uniforms, etc.

Individual Training Account Policy Change – Appeals Process: Jennifer reviewed the proposed ITA Appeal Policy changes. Our previous policy lacked detail on how a participant could appeal for an ITA based on demand and / or above the approved number on the In-Demand Occupation list, so detail has been added on what will be reviewed during an appeal process. Appeals will need to show documentation to support the need for the occupation, such as active job postings, benefits, evidence of workforce shortages, such as sign on bonuses, and employer statements of need. All board approved policies are on our website and this policy will be included in the participant policy manual if approved by the full board.

- **MOTION: Jimmy Williamson moved to approve the proposed change to the Individual Training Account policy as presented and Ted Piazza seconded the motion. All were in favor and the motion carried.**

Labor Force Participation Rate (LFPR) Strategic Priorities—Skills & Career Advancement: Jennifer Bane requested feedback on effective and innovative strategies and what the Board and AJCs can / should do to assist

employers regarding skills and career advancement. The attached handout describes what is meant by 'career & skills advancement' as it relates to high quality jobs according to the QUEST National Dislocated Worker Grant (DWG) and U.S Department of Commerce. Committee members said partnering with Upskill Midsouth for training has been successful but noted that lack of space can be a hinderance for offering training for employees. Jennifer said the Incumbent Worker Training (IWT) program can assist with costs of training existing employees; however, we typically use State CBG funding for IWT and those funds are often limited and only available at certain times. The State has also indicated that they will most likely not have funding available for CBG grants this year. There is a DRA grant that we are looking at applying for that can assist with technical and credentialed training. Proposals for this grant are due in December and letters of support will be needed, so if employers have specific training needs, they can let the board staff know.

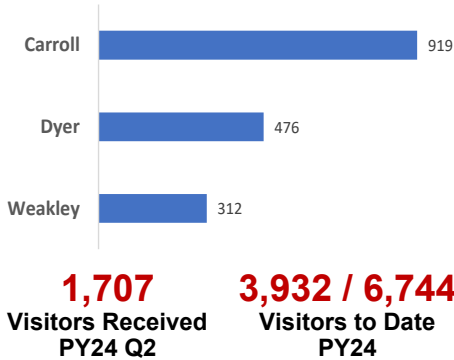
Other Business: Jennifer reminded the committee that annual Conflict of Interest forms are due by 12-31-2024. Forms will be emailed with the next board meeting packets and paper copies will be available at the December 3rd board meeting.

Future Meeting Dates & Upcoming Events: Future meeting dates and upcoming events were listed on the agenda. The proposed dates for 2025 committee and board meetings are also included. It is proposed to move the AJC committee meeting to 9AM starting on the 2-11-2025 meeting.

Respectfully Submitted, Ariel McGahey, Director of Operations

American Job Center Services

Customer Visits



AmericanJobCenter
TENNESSEE

SURVEY RESULTS

Overall, 93% of customers (171 out of 184) answered "Completely Satisfied" with our services!

TOP 5 REASONS FOR VISIT

1. Job Search/Resource Room
2. Unemployment
3. Networking
4. Job Search Assistance
5. Job Fair

3,274 Services Provided

Key Performance Indicator Results

Title I Adult / Dislocated Worker (DW) Youth Enrollments

PY24 Q2

45 / 65
69.2%
Approaching Target

Year to Date PY24

130 / 280 YTD (46%)

Title I / Title III Co-Enrollments

PY24 Q2

15.9% / 70%
22.7%
Off Target

Year to Date PY24

15.9% / 90% YTD (17.7%)

Title III Wagner Peyser New Enrollments

PY24 Q2

505 / 304
166.1%
On Target

Year to Date PY24

1,100 / 1,216 YTD (90%)

Program Highlights

American Job Centers



On August 16, 2024, Belinda Potter, a Career Specialist, was contacted by Brooks Young, Workforce Development Director for TDLWD, with an opportunity to represent the state at the new Stanton Outreach Center inside the TCAT Stanton/Blue Oval site. Belinda accepted the role and began splitting her time between the Stanton Outreach Center and the Dyersburg American Job Center (AJC).

She started at the new site on September 17, 2024, and quickly made an impact, meeting with a professor and three students in her first few days. "As we continue to network, collaborate, and create successful partnerships, I am honored and grateful to have been chosen for this exciting adventure. The word 'forge' kept coming to my mind, so I googled it, and 'What does 'forge in life' mean?' popped up. It said, 'Forging is consciously

choosing to do good, to create beauty and abundance for the ones you care about, and to become a better person every day.' I truly believe that we will be able to 'forge in life' here at this new facility and overcome any challenges that arise with our amazing team," Belinda said.

Belinda also emphasized the value of teamwork, saying, "TEAM = Together Everyone Achieves More," and highlighted the strong collaboration among the staff. "We have an exceptional team here, who go above and beyond to serve others well."

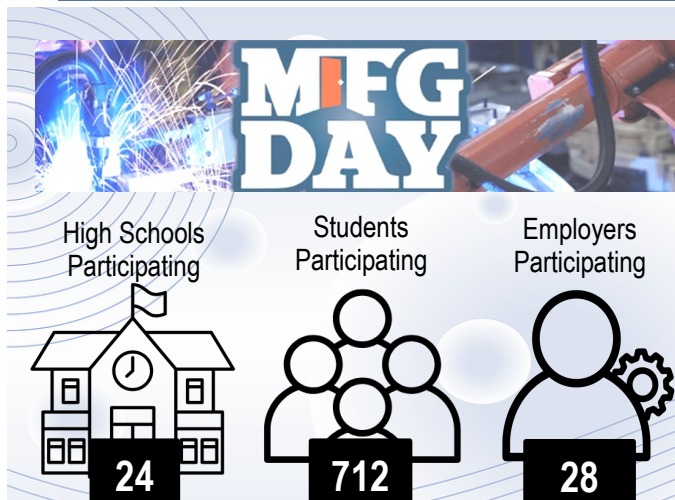
Since the AJC Outreach Center was co-located at TCAT Stanton, Belinda and the AJC team have participated in outreach events, helping students and community members access AJC services. The center has become an important resource for workforce development, thanks to the ongoing collaboration and dedication of the staff.

Business Services



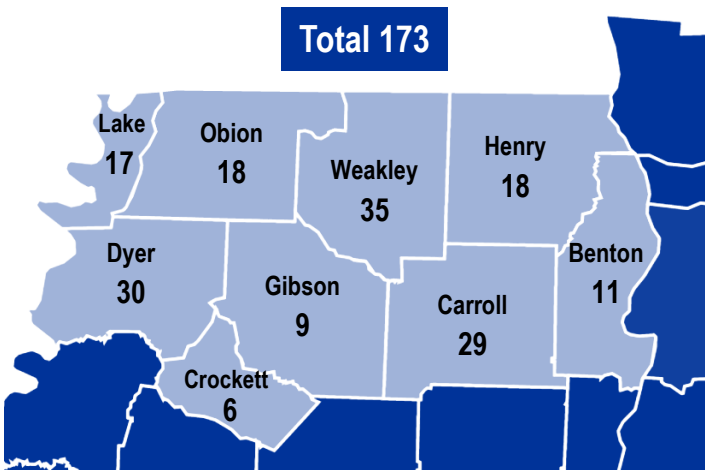
Rural Public Health Career Exploration Events were held during National HOSA week highlighting Respiratory Therapy and Emergency Medicine. The Northwest TN Workforce Board is in partnership with Baptist Hospital, Dyersburg State Community College, and Jackson State Community College to build an employment pipeline for Respiratory Therapists, Emergency Medical Technicians, and Paramedics to address the shortage in the rural counties. The team visited Dyer County High School, Dyersburg High School, Milan High School, and Humboldt Jr. / Sr. High School sharing career

information with 213 students. In addition to occupation specific information, educational requirements and financial aid information was distributed. Students also experienced the DSCC Ambulance Simulator and JSCC Medical Simulators. Current high school students conversed with current EMT, Paramedic, and Respiratory students to gain a peer-to-peer perspective.

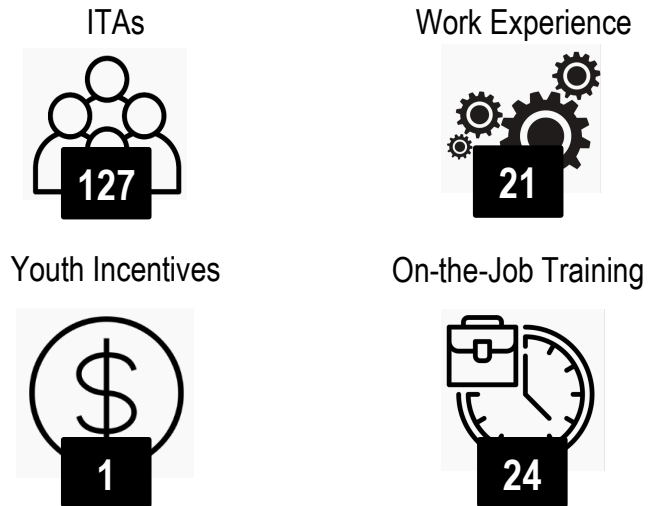


Training Services

Total Enrollments by County



Total Enrollments by Service



National
Dislocated
Worker
Grant



98/ 100
Enrolled



\$336,069 of
\$615,978
Expended

Individual Training Accounts (ITAs) By Sector

Healthcare &
Social Assistance



Manufacturing



Skilled Trades



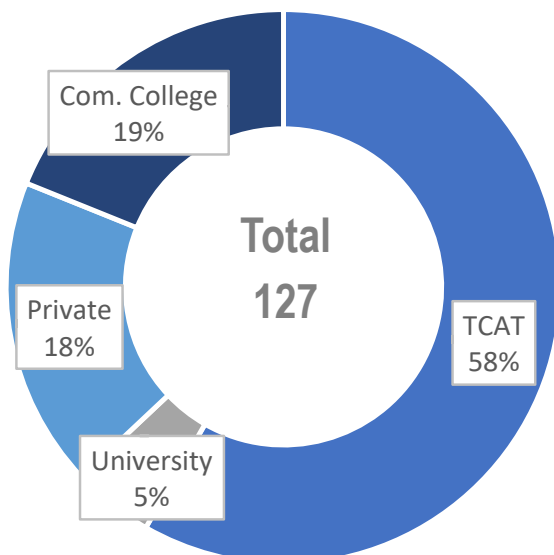
Transportation



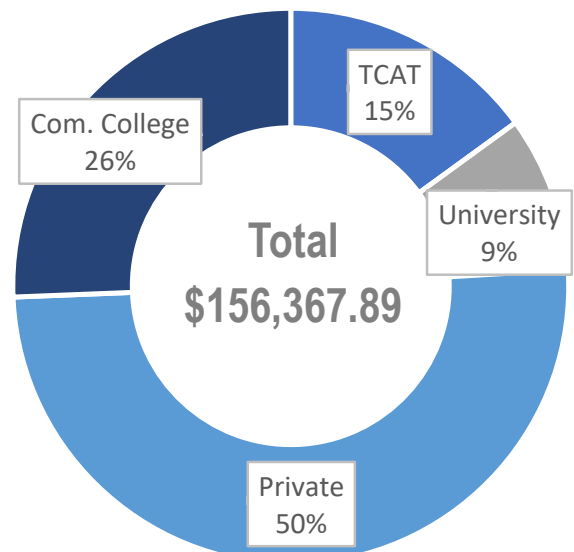
Information and
Professional, Scientific,
& Technical Services



New ITAs By Provider Type

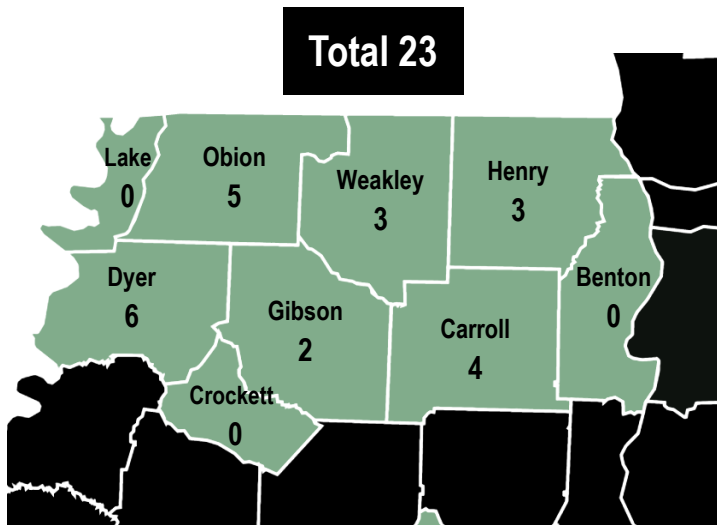


Total ITA Investment by Provider



Business Services

OJT Employers by County



On-the-Job Training Participants



Number Trained by Sector

Healthcare & Social Assistance



Manufacturing



Skilled Trades



Transportation



Information & Professional, Scientific, & Technical Services



Apprenticeship Grant



Virtually Speaking Webinars

VIRTUALLY SPEAKING

Workforce Webinar Series for West TN Workforce Boards & their Special Guests



- Unemployment Insurance Updates for Tennessee Employers
- Artificial Intelligence (AI) in the Workplace

All webinars are recorded and may be found when you scan the QR code or visit our YouTube page at @NWSWTNAJC



72 Reports Produced



Economy Overviews



Education Reports



Industry Reports



Occupation Reports

Work-Based Training

Effective Date: ~~May 23, 2023~~ March 11, 2025

Duration: Indefinite

Purpose: To establish policy and guidance for the offering of work-based learning activities with WIOA funding.

Policy: The Local Workforce Development Board (LWDB) offers various opportunities for Work-Based Learning, including On-the-Job Training, Work Experience, Transitional Jobs, Apprenticeships and Incumbent Worker Training. The Regional Planning Council, which includes members of the core partners as well as other partners, identifies regional and local in-demand and emerging sectors using available labor market data, strategy meetings, and other data gathering methods. Workforce efforts, including Work-Based Learning, are then focused on identified sectors through services available in the AJC. For instance, manufacturing and healthcare are two of the most prominent sectors in the area, therefore On-the-Job Training (OJT) and Incumbent Worker Training (IWT) grants are heavily concentrated in these areas. The LWDB strives to continually increase employer penetrations rates and will serve as many employers as possible based on employer hiring needs and availability of funding.

The LWDB strives to utilize a significant amount of funding allocated to local area through formula program funds and / or specialized funding such as Consolidated Business Grants (CBGs) to provide work-based learning opportunities. Appropriate support services, as described in the Supportive Services policy in this document, may be used in combination with work-based training as prescribed below and in accordance with the needs of participants.

Outreach to Employer Community

In order to promote and strategize the availability of Work-Based Training, understanding and meeting the needs of employers is given the utmost importance and is achieved through a collaboration of partners serving on the Business Services Team, such as Labor Exchange, Veterans Programs, Trade Act, Re-Employment Services, Unemployment Insurance, Economic Development, Temporary Assistance for Needy Families, Vocational Rehabilitation, and staff to the LWDB. The Business Services Team is responsible for connecting with companies in the targeted industry sectors and occupations, and other employers that have hiring needs, in order to understand and meet their needs through a variety of employer-driven initiatives and services.

In order to understand and meet the needs of employers, Business Services Team members connect with area employers by participating in regional economic development groups comprised of training providers, Chambers of Commerce, plant managers, and economic developers to determine high-growth jobs and industries that are adding substantial jobs to the local economy. Local employers also serve on the local workforce development board and a standing committee of the board. Labor market information (LMI) is also utilized to identify and meet employers' needs. LMI is available through Jobs4TN and ~~Lightcast Economic Modeling Systems, Inc. (EMSI)~~ and can be used to help employers identify average wages for jobs in an area, which occupations are predicted to have the most future job openings, as well as unemployment rates in an area. The Executive Director of the LWDB and/or his/her designee, also supports and promotes work-based learning with existing and prospective industry, when appropriate. Interested employers are referred to a Business Services Team member for specific details and services.

General Employer Eligibility Criteria

Employers who are classified as a Tennessee (TEGL 25-15) for-profit business or, not-for-profit business with a presence, in accordance with Federal, State and Local law, and in business for at least 120 days that meets the following requirements:

- Be registered with Internal Revenue Service (IRS), have an account with Unemployment Insurance, and carry workers' compensation insurance (Federal Register Vol. 81, No. 161, Page 56117) and be current on all local, state and federal tax obligations.
- Be financially solvent and have an adequate payroll recordkeeping system that tracks hours worked, gross pay, deductions, and net pay.

- Must not appear on any federal suspension or debarment list.
- Be able to enter into agreements that will not displace any currently employed worker (WIOA Section 181[b][2][A]).
- Be able to enter into agreements that will not result in termination of any regular employee, or otherwise reduce the workforce, in order to hire a work-based training employee.
- Verify relocation (for the first 120 days after beginning operations) has not resulted in any employee job losses at the original location (WIOA Section 181[d][2]). To verify that the relocation has not resulted in a loss of employment, WIOA program staff and the work-based training employer must complete a Standardized Pre-Award Review.
- Not currently be involved in a labor dispute (20 CFR 680.840) or have workers currently in a layoff status for the work-based training position.
- Assure employees do not work on construction, maintenance, or operation of any facility that is used for sectarian activities (WIOA Section 188[a][3]).
- Must not meet the existing “pattern of failing to provide OJT specific work-based training participants with continued long-term employment as regular employees with wages and employment benefits” (20 CFR 680.700[b]).
- Must not illegally discriminate in training or hiring practices because of race, color, sex, national origin, religion, disability, political beliefs or affiliation, or age.
- Assure training for employees must be in an in-demand industry as determined by the Local Workforce Development Board (LWDB) and/or its’ Service Provider.
- Assure training will benefit employees by increasing opportunity for learning new skills, gaining experience, retention, advancement, credentials or wages.
- Assure training will benefit the employer by providing assistance with training employees, which may result in saving jobs or preventing layoffs, enhance process improvement, or improve the overall competitiveness of the employer.
- Per WIOA regulations (10 CFR 638.200(g), assure “no individual may be placed in an employment activity if a member of that person’s immediate family is directly supervised by or directly supervises that individual.” For the purpose of this policy, the term “immediate family” includes a spouse, child, son-in-law, daughter-in-law, parent, mother-in-law, father-in-law, sibling, bother-in-law, sister-in-law, aunt, uncle, niece, nephew, step-parent, step-child, grandparent or grandchild
- Comply with all contract/agreement provisions in accordance with the local workforce development board, Tennessee Department of Labor and Workforce Development and the Workforce Innovation Opportunity Act guidance and regulations.

General Participant Eligibility

Work-based training opportunities must be identified as an appropriate activity for program participants on the Individual Employment Plan (IEP) or Individual Service Strategy (ISS). IEPs or ISSs, and/or case notes, will specify goals of the work-based training activity by identifying the purpose of the activity and expected outcomes.

The Local Workforce Development Area Priority of Service Policy will be adhered to in determining participants eligible to participate in work-based training. In order to maximize services to populations with barriers, agencies serving these populations are targeted for outreach efforts such as distribution of marketing materials, participation in events, and invitations to participate in AJC events and strategy meetings. The AJC displays marketing materials for core and community partners and provides materials to be displayed at the partners' sites. Social media accounts are also used to connect with customers and other agencies and inform them of the services available through the AJC.

The Business Services Team conducts rapid response meetings in order to serve workers dislocated through closures or layoffs. Outreach to unemployment claimants regarding AJC services is also conducted when contact information is available. Specialized programs such as RESEA, serving unemployment claimants, and SNAP Employment & Training, serving SNAP (i.e. food stamp recipients) are also incorporated into services at the AJC.

The Outreach and Opportunities committee of the local workforce board provides guidance for reaching and serving such populations.

In addition, the participant must be:

- A U.S. citizen or individual legally entitled to work in the U.S.
- Age 18 or older* (exception may be made for Eligible WIOA Youth)
- Registered for the Selective Service unless an exception is justified (Selective Service requires registration of all males who are 18 or older and born on or after January 1, 1960)

Work-Based Training Components

Incumbent Worker Training

The term “incumbent worker training” (IWT) means training that is — 1. Designed to meet the specific requirements of an employer (including a group of employers); and 2. Conducted with a commitment by the employer to continue to employ an individual upon successful completion of training. IWT may be used to help avert potential layoffs, or to increase the skill levels of employees so they can be promoted within the company and create backfill opportunities for the employers.

- ***ITW Funding:*** The LWDB may provide incumbent worker training using statewide discretionary funds provided by the Governor and/or under WIOA Section 134(d)(4)(A)(i) of WIOA, LWDBs can use up to twenty percent (20%) of their adult and dislocated worker formula funds to provide for the Federal share of the cost of providing incumbent worker training.
- ***Eligibility Requirements for Employers for IWT Grant:*** An employer must meet all the following criteria in order to qualify for an Incumbent Worker Training Grant:
 - Grantee must be classified as a Tennessee for-profit business (or a not-for-profit business in health care)
 - Be in an in-demand industry as determined by Jobs4TN labor market information; OR
 - Be in an in-balance industry as determined by Jobs4TN labor market information
 - Be in a declining industry, but with compelling reasons (e.g., evidence of long-term viability of the employer) justifying investment in incumbent worker training
 - Must be in operation for at least one year
 - Must employ at least five full-time employees
 - Must be current on all local, state, and federal tax obligations
 - Must be a financially viable business not currently or recently experiencing, nor expecting to experience, a bankruptcy
 - Must not appear on any federal suspensions or debarment list
 - The Employer must be able to match requested training costs. Percentage of match is based on the size of the company, in accordance with Tennessee Department of Labor and Workforce Development policy (see Employer Share and Qualifying Costs below).
 - Must agree to submit reimbursement requests in the timely manner agreed upon with the LWDA, with required support documentation.
 - Must agree to complete an online monthly status report if required by the TDLWD.
 - Additional factors considered when determining employer eligibility include
 - The characteristics of the incumbent workers to be trained and how they would benefit from retention or advancement – consideration should be given to employers who propose to train individuals with barriers to employment as defined in WIOA Section 3(24).
 - The quality of training – whenever possible the training should allow the participant to gain industry-recognized training experience and/or lead to industry-recognized credentials and/or an increase in wages.
 - The number of participants the employer plans to train or retrain
 - The wage and benefit levels of participants both before and after training

- o The occupation(s) for which incumbent worker training is being provided must be in demand for that industry

Each of the above factors leading to the approval of an incumbent worker training project with an employer must be documented and placed in the contract file.

- **Delivery of IW Training Services:** Training can be provided through Tennessee's public or private educational institutions, private training organizations, trainers employed by the business, or a combination of training providers. Training can be conducted at the business's own facility, at the training provider's facility, or at a combination of sites. All training must be completed by the last day of the specific program period in the grant contract agreement.
- **Employer Match Share and Qualifying Costs:** Employers participating in incumbent worker training are required to pay the non-WIOA (non-federal) share of the cost to provide training to their incumbent workers (WIOA Sections 134(d)(4)(C)-(D) and 20 CFR 680.820). The employer share is based on the size of the workforce as follows:
 - At least 10% of the cost for employers with 50 or fewer employees
 - At least 25% of the cost for employers with 51 to 100 employees
 - At least 50% of the cost for employers with more than 100 employees

Employer cost share contributions must be tracked and documented in the contract file. Wages paid to the participant while in training can be included as part of the employer match share. Other expenses can be provided as cash or in-kind, as long as they are fairly evaluated. The methodologies for determining the value of in-kind contributions must be documented in the contract file and conform to cost sharing requirements at 2 CFR 200.306.

Reimbursable Training Expenses are as follows:

- Instructors'/Trainers' salaries capped at actual amount or \$50/hour if company trainers are used (whichever is less)
- Curriculum development not to exceed 5% of total State obligation (curriculum development is defined as the time necessary for company officials to determine training needs or the actual development of a curriculum)
- Textbooks and manuals
- Materials and supplies
- Tuition expense (tuition is defined as instruction provided by an institution regulated by the Tennessee Higher Education Commission)

Non-Reimbursable Costs, include but are not limited to:

- Trainee's wages
- Purchases of capital equipment
- Purchase of any item or service that may possibly be used outside of the training project
- Travel expenses of trainers or trainees
- Assessment, testing, or certification fees
- Language training unless specific terms of employment
- Advertisement or recruitment
- Any costs not approved in the final sub-recipient agreement

The Employer will be reimbursed for documented allowable costs at 100% of the maximum authorized instructional component cost when at least 90% of Eligible Trainees enroll in the specific training component. If less than 90% of eligible trainees enroll in the specific training component, the reimbursement will be prorated based on the percentage enrolled of the 90% minimum number. The Incumbent Worker Training program will be evaluated for completion of training and placement in employment based on federal performance measures prior to subsequent programs being funded.

- **Incumbent Worker (Participant) Eligibility:** In order to qualify as an Incumbent Worker Participant, the following is required:
 - Must be a U.S. citizen or individual legally entitled to work in the U.S.
 - Must be 18 years of age or older
 - All males age 18 or older and born on or after January 1, 1960 must be registered for the Selective Service unless an exception is justified
 - Must be employed
 - Must meet the Fair Standards Act requirements for an employer-employee relationship (information regarding this requirement can be found at <http://www.dol.gov/whd>)
 - Must have an established employment history with the employer receiving the grant for at least six months (which may include time spent as a temporary or contract worker performing work for the employer receiving IWT funds), or, in the event that incumbent worker training is being provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for six months or more as long as a majority of those employees being trained meet the employment history requirement per TEGL 19-16.

An incumbent worker does not have to meet eligibility requirements for career and training services through WIOA Title I Adult and Dislocated Worker Programs unless they are enrolled in the Adult or Dislocated Worker Program.

- **ITW Grant Application Process:** Businesses may submit the application, along with all required documents, online at www.TN.gov/workforce ~~<https://www.tn.gov/workforce/article/incumbent-worker-training>~~. ~~The application is found at <https://www.tn.gov/workforce/article/apply-for-iwt>~~ where the responses will then be forwarded to the appropriate LWDA. Local Workforce Development Boards must determine the eligibility of applications for each LWDA that is representative (based on county and grouped by region) of the company or business.

All grants for Incumbent Worker Training will be awarded and operated in accordance with Tennessee Department of Labor and Workforce Development policy and the Workforce Innovation and Opportunity Act law and regulations.

On-the-Job Training

On-the-job Training (OJT) is a form of work-based training provided to an eligible WIOA participant upon entry into employment and while engaged in paid work. OJTs address specific gaps in the trainee's knowledge or skills that are inhibiting their ability to perform assigned duties fully and adequately and provides reimbursement to the employer of up to 50 percent of the wage rate of the participant for the extraordinary costs of providing the training and additional supervision related to the training. An OJT may take place with an employer in the public, private non-profit, or private for-profit sectors. Generally, in order to participate in OJT a participant must be a new hire in the employer position (some exceptions may be made for employee upgrades). The Employer will be reimbursed up to 50% of participant wages **up to \$25 per hour, or a maximum reimbursement of \$12.50 per hour** (and not to exceed the established State wage cap for OJT, **if applicable**) upon completion of a designated training period not to exceed the Specific Vocational Preparation (SVP) level, taking in to account the prior education, training, work experience and the service strategy of the participant, as appropriate. **The training period shall be limited to a maximum of 320 hours unless otherwise approved by the Executive Director for extenuating circumstances deemed to be in the best interest of the applicant and the WIOA program.** The OJT wage rate will be evaluated for appropriate level for self-sufficiency **to include a minimum starting wage of at least the Board's approved self-sufficiency threshold and / or the opportunity for** wage progression prior to entering into the OJT agreement. Employers will be required to agree to all provisions in the WIOA On-the-Job Training Program Employer/Grantee Assurances and other guidance issued by the Grantor. Further, the Employer must not have exhibited a "pattern of failing to provide OJT participants with continued long-term employment as regular employees with wages and employment benefits."

Registered Apprenticeships

A Registered Apprenticeship (RA) is an "earn and learn" training model that combines structured learning with on-the-job training from an assigned mentor. 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. This credential is also portable (see WIOA Section 122[a][2][A]). Local areas may also include support services, in coordination with career and or training services, to participants in an RA program in accordance with supportive services consistent with WIOA Section 134(d)(2), TEGL 19-16, and local policies. To be eligible, a participant must be selected by the employer to participate in a Registered Apprenticeship program (included on the WIOA Eligible Training Provider List), which may include participation in a pre-apprenticeship program.

- o A Pre-apprenticeship is a program or set of strategies designed to prepare individuals to enter, and succeed in, registered apprenticeship programs. These programs have a documented partnership with at least one registered apprenticeship program sponsor. Pre-apprenticeship programs expand the participant's career pathway opportunities by combining industry-based training and classroom instruction. Adult, Dislocated Workers, or Youth participating in pre-apprenticeship may receive funding through paid work experience positions, and associated support services, in accordance with the guidelines listed in the Work Experience section of this policy.

To qualify for local LWDB WIOA funding for a pre-apprenticeship program, the company must be approved as a Tennessee Certified Pre-Apprenticeship Program by the TN Department of Labor and Workforce Development and training must meet the criteria established in the LWDB Training Provider Approval policy – Program of Training including leading to at least one (1) of the following:

- An industry-recognized certificate or certification, a certificate of completion of a Registered Apprenticeship, a license recognized by the State involved or the Federal government, an associate or baccalaureate degree;
- A secondary school diploma or its equivalent;
- Employment; or
- Measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress, towards a credential or employment.

In accordance with United States Department of Labor (USDOL) Training Employment Guidance Letter (TEGL) 13-16 a pre-apprenticeship program may be included on the Eligible Training Provider List for use of WIOA Title I Individual Training Accounts (ITAs) funding for eligible individuals, by going through the same vetting process and performance reporting requirements as all other training providers in the State. Programs may also contract directly with the LWDB under the Training Provider Approval policy – ETPL Exceptions.

When utilizing a contract versus an ITA for pre-apprenticeship programs, the costs will be on a reimbursement basis and are limited to:

- Instructors'/Trainers' salaries capped at actual amount or \$50/hour if company trainers are used (whichever is less),
- Textbooks and manuals,
- Materials and supplies,
- Tuition expense, defined as instruction provided by an institution regulated by the Tennessee Higher Education Commission

All costs must be supported by documentation and occur within the terms of the contract. Contracts will be negotiated based on instructional hours and minimum number of participants. The Contractor will be reimbursed for documented allowable costs at 100% of the maximum authorized instructional component cost when at least 90% of eligible trainees enroll in the specific training component. If less than 90% of eligible trainees enroll in the specific training component, the reimbursement will be prorated based on

the percentage enrolled of the 90% minimum number. The pre-apprenticeship program will be evaluated for completion of training and placement in employment based on federal performance measures prior to subsequent programs being funded.

Transitional Jobs

The local area may use up to 10% of their combined total of Adult and Dislocated Worker allotments for transitional jobs as described in WIOA Sec. 134(d)(5). A transitional job is one that provides a time-limited work experience, that is subsidized in the public, private, or non-profit sectors with eligible employers for those individuals with barriers to employment who are chronically unemployed or have an inconsistent work history. Transitional jobs must be combined with comprehensive career and support services and are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to entry into and retention in unsubsidized employment. Unlike an On-the-Job Training (OJT) contract, there is no expectation that the individual will continue his or her hire with the employer after the work experience is complete; however, employers are encouraged to consider establishing an OJT contract and ultimately employment for individuals participating in transitional jobs as part of a *Ready, Set, Hire* approach to hiring job seekers to fulfill their human resource needs.

- ***Ready, Set, Hire:*** The *Ready, Set, Hire* approach allows a job seeker and employer to mutually benefit from the combined offerings of:

- ***Ready - Transitional Job*** Up to 320 hours of subsidized employment through a transitional job based on the job seeker's needs as documented on the Individual Service Strategy (ISS). The job seeker's employment is subsidized through the WIOA Adult or Dislocated Worker program at no cost to the employer. The job seeker will be paid through the program at the higher of 100% of the starting rate of the position being performed or a minimum of \$8.00 per hour.

Note: The LWDB Director may approve work experience through a transitional job beyond 320 hours on a case-by-case basis as needed based on the job seeker's need as documented on the ISS.

- ***Set - OJT Position*** Up to 320 hours of employment through an OJT grant, based on the job seeker's needs as documented on the ISS and the training needs of the position as demonstrated by the Specific Vocational Preparation (SVP) level of the position. Employers may be reimbursed up to 50% of an eligible OJT participant's wages for the completion of the specified training period in accordance with the guidelines set forth in the Business Services Manual, OJT Assurances, and OJT Needs Assessment.
- ***Hire!*** Employers are encouraged to consider hiring participants who successfully complete a Transitional Job, with or without an OJT contract. Participants on an OJT contract are employees of the business and are expected to be retained upon the successful completion of the training period. Employers may qualify for a Work Opportunity Tax Credit ranging from \$1,200 to \$9,600 for hiring individuals with barriers who are considered a member of a qualified targeted group.
- ***Eligibility Criteria:*** In order to be eligible for a transitional job, applicants must:
 - Be determined eligible as an Adult or Dislocated Worker in accordance with the guidelines set forth in the Adult and Dislocated Worker Eligibility section of this Manual; and
 - Have a barrier(s) to employment as documented by being a member of 1 or more of the following populations in accordance with the guidelines set forth in this Manual:
 - Displaced homemakers.
 - Low-income individuals.
 - Indians, Alaska Natives, and Native Hawaiians, as such terms are defined in section 166.
 - Individuals with disabilities, including youth who are individuals with disabilities.
 - Older individuals.
 - Ex-offenders.

- o Homeless individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))), or homeless children and youths (as H. R. 803—10 defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))).
- o Youth who are in or have aged out of the foster care system.
- o Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers.
- o Eligible migrant and seasonal farmworkers, as defined in section 167(i).
- o Individuals within 2 years of exhausting lifetime eligibility under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.).
- o Single parents (including single pregnant women).
- o Long-term unemployed individuals (i.e. individuals who have been unemployed 27 weeks or longer).
- o Such other groups as the Governor involved determines to have barriers to employment; and
- Be chronically unemployed or have an inconsistent work history, as defined by the LWDB in accordance with § 680.190, and documented in the work history section of the Application. Taking into consideration an individual’s labor market history, unemployment status, durations of unemployment, and long-term unemployment status, the LWDB has determined individuals to be chronically unemployed or to have an inconsistent work history if they meet one or more of the following items:
 - o Currently unemployed and have been unemployed for 27 weeks or longer (long-term unemployed).
 - o Currently unemployed for less than 27 weeks but have had at least one period of unemployment for 27 weeks or longer within the last 5 years.
 - o Two or more significant (10 weeks or longer) gaps in employment within the last five years.
 - o Three or more position changes within the last three years.
 - o Three or more gaps in employment within the last three years.
 - o Have been incarcerated within the last 10 years; and
- Receive appropriate Basic and / or Individualized Career Services to prepare for a successful entry into and retention in a transitional job and ultimately unsubsidized employment as documented on the ISS; and
- Receive support services, as described in the Supportive Services section of this Manual, in order to be able to participate in a transitional job and ultimately unsubsidized employment.

Work Experience - In-School and Out-of-School Youth

WIOA and 20 CFR § 681.590(a) require that a minimum of 20 percent of local area funds for the Title I Youth program be spent on work experience. As explained in 20 CFR § 681.590(b), local area administrative costs are not subject to the 20 percent minimum work experience expenditure requirement.

According to 20 CFR § 680.180, for the purposes of WIOA sec. 134(c)(2)(A)(xii)(VII), an internship or work experience is a planned, structured learning experience that takes place in a workplace for a limited period of time. Internships and other work experience may be paid or unpaid, as appropriate and consistent with other laws, such as the Fair Labor Standards Act. An internship or other work experience may be arranged within the private for profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience setting where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists. This experience provides participants with opportunities for career exploration and skill development. Work experience must include academic and occupational education (20 CFR 681.600[a-b]).

WIOA identifies four categories of work experience: (1) summer employment opportunities and other employment opportunities available throughout the school year; (2) pre-apprenticeship programs; (3) internships and job shadowing; and (4) on-the-job training (OJT) opportunities as defined in WIOA Section 3(44) and in 20 CFR § 680.700. Eligible WIOA youth program participants may participate in more than one work experience program (i.e. summer employment, job shadowing, pre-apprenticeship) over the duration of their

program participation (20 CFR 681.600[c]). Work experience will enhance employability of youth through the development of work readiness and basic work skills including, but not limited to communication, punctuality, attendance, dependability, teamwork, completing a task, time management, decision making, motivation and conflict resolution.

Job shadowing is a work experience option where youth learn about a job by “walking through the work day as a shadow” to become competent workers. The job shadowing work experience is temporary, unpaid exposure to the workplace in an occupational area of interest to the youth.

Paid Work Experiences will be paid through the program at the higher of 100% of the starting rate of the position being performed or a minimum of \$8.00 per hour wage. Participants may work up to 40 hours per week for up to six (6) months, not to exceed 975 total hours as designated by the contract/agreement and individual employment plan. **In-School Youth who have limited availability to work during the school year may be allowed to participate for longer than 6 months, if needed, to attain the 975 hours allotted.**

Per TEGL 21-16, Operating Guidance for the Workforce Innovation and Opportunity Act, the required academic and occupational education component of work experience refers to contextual learning that accompanies a work experience. It includes the information necessary to understand and work in specific industries and/or occupations. For example, if a youth is in a work experience in a hospital, the occupational education could be learning about the duties of different types of hospital occupations such as a phlebotomist, radiology tech, or physical therapist. Whereas, the academic education could be learning some of the information individuals in those occupations need to know such as why blood type matters, the name of a specific bone in the body, or the function of a specific ligament. The educational component may occur concurrently or sequentially with the work experience. The academic and occupational education component may occur inside or outside the work site. The work experience employer can provide the academic and occupational component or such components may be provided separately in the classroom or through other means. The Career Service Provider must document the academic and occupational education components of the work experience on a training plan to be maintained in the participant’s electronic file in Jobs4TN / VOS.

Work Experience - Adult and Dislocated Worker

In the event that an individual between the ages of 18 and 24 does not qualify as a Youth to be able to participate in a Youth Work Experience position, the individual may be enrolled in the Work Experience position as an Adult or Dislocated Worker as described above. Per WIOA sec. 134(c)(2)(A)(xii)(VII), Adults and Dislocated Workers may receive Individualized Career Services, if determined to be appropriate in order for an individual to obtain or retain employment, that may consist of internships and work experience that are linked to careers. Adults and Dislocated Workers participating in paid work experiences will be paid at the higher of 100% of the starting rate of the position being performed or a minimum of \$8.00 per hour wage.

Eligible Adults and Dislocated Workers over the age of 24 may be served through the Transitional Job component. Transitional jobs are a type of work experience, as described in §§ 680.190 and 680.195 and addressed separately in this policy. When applicable, under discretionary grants, such as National Dislocated Worker Grants awarded to assist with disaster and / or employment recovery efforts related to covered events, any Adults and Dislocated Workers aged 18 and over may participate in work experience.

Contracts and Agreements for Work-Based Training

Work-based opportunities will include an agreement (contract) with the employer and a training plan for the employee. The contract must include the requirements of WIOA rules and regulations, the type of occupation and skills, the competencies to be learned, and the length of training that will be provided. Contracts / agreements vary based on the type of work-based learning, but will be in an approved format in accordance with LWDB guidance, Tennessee Department of Labor and Workforce Development, and WIOA policy guidance and regulations and include the following:

- Basic Program description
- Cost Per Participant (varies by activity; subject to LWDB policy)

- Appropriate goals for the participant and/or employer.
- The contract awarded will be cost reimbursement. No expenses are reimbursable until a contract has been fully executed (signed by all parties) and, all participant data has been submitted and deemed eligible.

Additionally, work-based learning activities will comply with the following:

- All necessary information about a work-based participant and employer must be properly recorded in the Jobs4TN (VOS) system. Work-based training expenses must be reported by Service Providers on a timely basis to ensure the LWDB can properly report the expenditures in the Grants4TN system.
- Contracts for Work-based training must be monitored at least once by the contracting authority.

Monitoring for Work-Based Training

Work-based training expenditures are tracked accordingly in the accounting system of record and reported monthly on internal documents as well as required State reports. Expenditures and obligations are monitored monthly to ensure compliance with appropriate expenditure and obligation requirements. Monitoring will be based on the contract agreement and may be performed by the contract manager or another position. If the Work-based training is for reimbursement of wages, the employer must submit the following for review:

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

Onsite monitoring visits should be conducted shortly after the trainee begins work, and include additional visits at appropriate intervals (determined by the length of the training plan). Effective monitoring also includes desk review of correspondence from the employer, including payment invoices and required documentation to support those invoices. The Service Provider must regularly review each trainee's progress in meeting program and service strategy objectives. Such strategies should include the trainee's acquisition of basic/occupational skills and the adequacy of supportive services provided as related to work-based training. Any deviation from the work-based training contract should be dealt with and documented promptly.

Monitoring at the LWDB, State, and Federal level will include a review of the Service Provider's monitoring and oversight of participant training and corresponding employer payroll records, as well, as a review of how work-based activities align with and are facilitating the progress of career pathway strategies outlined in the local plan.

Upon completion of the monitoring review (both program and fiscal), a letter of the results will be sent to the OJT Contractor noting any findings. The OJT Contractor may be asked to respond to the monitoring report with a corrective action plan regarding any issues noted in the report. If no issues/concerns are noted in the report, a response from the OJT Contractor will not be necessary. Should it be necessary, follow-up and technical assistance will be given by LWDB staff to the contractor in order to bring them into compliance with WIOA Regulations and LWDB policies.

Reference: 20 CFR 680.700(b); 20 CFR 680.840; Federal Register Vol. 81, No. 161, Page 56117; TEGLs 03-15 (specifically "Training Contracts" on pages 9-10) and 19-16; WIOA Section 181(b)(2)(A); WIOA Section (d)(2); WIOA Section 188(a)(3); WIOA sec. 134(c)(2)(A)(xii)(VII); 20 CFR § 680.180.

Related TDLWD Policy: Incumbent Worker Training Grants Policy; Work-Based Training Guidance (pages 3 & 10)

Vetted and Approved by the Local Workforce Development Board: ~~May 23, 2023~~ March 11, 2025



Job Security & Working Conditions

Ensure a safe, healthy, and accessible workplace and offer job security. Minimize temporary or contractor labor solutions, using such workers mainly to adjust for short-term needs. Assess and schedule hours that are adequate and predictable.

Strategies and Actions

Increase job security.

- Minimize part-time and contingent work, which can cause job insecurity and deprive workers of important benefits and protections. Be sure that part-time and contingent workers feel valued and that they are a part of the organization.
- Prepare the workforce for changing capacity and needs, and balance the needs of the workforce and the organization.
- Offer job sharing.
- Ensure organizational continuity.
- Plan to prevent workforce reductions and minimize the impact of any necessary reductions.
- Enact just-cause standards for employment, which would prohibit discipline and dismissal unless for a just cause or genuine business needs.

Ensure that workers are physically safe.

- Fulfill the requirement that all workers have the right to safe, healthy, and sanitary working conditions.
- Prohibit and prevent all forms of violence in the workplace, including verbal, physical, and gender-based violence, as well as sexual harassment.
- Regularly assess working conditions and promptly address safety issues to ensure workers' continued safety.
- Ensure that the safety system addresses prevention, inspection, root-cause analysis of failures, and recovery.
- Support a worker safety and health committee.

Ensure that workers are psychologically safe.

- Assess/measure the workforce's sense of psychological safety.
- Actively support workers' sense of well-being at work.
- Actively ensure an absence of fear, intimidation, or neglect in the workforce. Have a clear system of reporting and remedy.



Anticipate and respond with agility to reduce job strain.

- Utilize ongoing assessments of work activity, intensity, risk, and need for flexibility to adjust or lessen worker stress.
- Anticipate high-volume times and adjust staffing to accommodate those times.
- Adjust workload, staffing, and pay based on location specific circumstances and reflect locality pay and complexity.
- Make staffing decisions to maximize product and service effectiveness and customer value and not to meet payroll targets.
- Be prepared to ensure coverage in case of employee emergencies and time off.
- Encourage workers to discuss burnout or fatigue and offer resources to reduce it.

Protect workers' data and information.

- Establish clear data confidentiality and protection policies for workforce information.
- Regularly inform workers of information collection, surveillance, or monitoring and how information will be used, including for performance purposes (promotions, discipline, or dismissal).
- Give workers ownership over the data that they generate.

Offer stable and predictable hours to all workers.

- Assess and, when possible, meet workers' hourly needs.
- Provide workers their schedule at least two weeks in advance.
- Schedule most workers consistently for more than 15 hours a week.
- Minimize deviations from planned schedules. Make last-minute management-driven changes rare).

Offer flexible remote-work options.

- Offer telework or remote work.
- Ensure that telework and remote work do not adversely impact career advancement.

Sample Resources

- [Baldrige Excellence Framework: 5 Workforce](#)
- [Baldrige Excellence Framework: 6.2 Operational Effectiveness](#)
- [Future of Work in California](#)
- [Good Jobs Institute Diagnostic Tool](#)
- [Harvard Business Review – Childcare Is a Business Issue](#)
- [Harvard Business Review – How to Make a Job Sharing Situation Work](#)
- [OECD Job Quality statistics](#)
- [Urban Institute – Five Elements of a Good Job](#)

