Northwest TN Workforce Board Executive Committee Meeting
August 5, 2025 – 10:15 a.m.
Milan Chamber of Commerce, 1069 S. Main St., Milan, TN / Zoom
Chair- Ted Piazza, Vice-Chair- Jimmy Williamson

Minutes

Committee Members Attending: Ted Piazza; **via Zoom:** Jimmy Williamson, Rita Alexander, Jon Dougherty
Staff Members and Contractors Attending: Jennifer Bane, Ariel McGahey, LeAnn Lundberg, Laura Speer, Ginger Powell; **via Zoom:** Lana Burchfiel, Gina Johnson
Guests Attending in Person: Sabra Bledsoe

Welcome and Call to Order / Public Comment / Review and Approval of Minutes of 5/6/25 Meeting: Ted Piazza welcomed everyone and asked if there were any public comments. Hearing none, Ted presented the minutes from the last meeting and asked the group for any feedback or changes:

- MOTION: **Rita Alexander moved to approve the 5/6/25 Executive Committee minutes as presented, and Jimmy Williamson seconded the motion. All were in favor and the motion carried.**

Facilities and Technology: LeAnn Lundberg, Director of Facilities and Technology reported on the following:

- Inventory: LeAnn recently completed inventory, and said she feels like it is in good shape for NW and SW. As previously discussed, we purchased new Surface Pros for staff and are still planning to update the resource room computers. LeAnn is looking at refurbished ones as an alternative.
- Potential Relocation and Re-designation of the Dyersburg AJC: The plan to relocate the Dyersburg AJC to the Vocational Rehabilitation (VR) building is no longer possible. The City of Dyersburg, which owns the building, has decided to use the space to store materials for the Dyersburg Police Department, making the location unavailable at this time. Currently, the AJC is operating on a month-to-month lease, and the property owner has indicated that a rent increase is likely. Several repairs are underway or needed, including work on the roof, HVAC system, and water damage. Margaret informed the landlord that if they increase the rent for a total cost of more than $50,000/year, the request for space would have to go out for bid, which may force us to move. In response, the landlord suggested the AJC could take over utilities instead. If all necessary repairs are completed, staying in the current location may still be an option. Other possible solutions are also being investigated. One idea is for VR to move in with the AJC instead; however, they have several moves currently taking place and likely could not move for at least a year. Another is to relocate the WFI administrative office to the current AJC building. Jennifer mentioned this might work if the firewall can be kept in place. Staff could potentially be placed on the right side of the building, and the back entrance could be used to manage access. The current office only costs about $15,000 per year, so the savings may not be enough to absorb the increased costs. Downsizing the AJC is also an option, which would mean finding a smaller space for about five staff members. An update will be provided at a future meeting.

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

- Quarterly Complaint Logs: No complaints have been received, and reports have been submitted to the State.
- Monitoring Status Report: The full report is attached. There were no issues.
- Data Validation Update: The state wants to hold another data evaluation training in September in Nashville. Jackson was previously suggested, which would be more convenient given staff were already required in Nashville for a week earlier this year for data validation. The last training was in February, and final results are still pending.
- Local Performance Results—Estimated PY24Q4 Results: The attached estimated results report was reviewed. The only measures not currently passing are MSGs for Youth at 60% out of a goal of 72.6%, and Dislocated Workers (DWs) at 78.6% out of a goal of 90.1%. Laura noted the projected annual results show everything passing. The PAR entrance conference is tomorrow, and site visits are expected in September. State program monitoring staff will visit at the end of August, focusing on AJC and state programs.

Budget & Administration Reports:

- Financial Status Report: Director of Finance & Administrative Services, Gina Johnson, presented the attached Financial Status Report detailing expenditure and obligation rates as of June, as well as fiscal performance results for the minimum participant cost rate (MPCR), Youth Work Experience expenditures, and In-School Youth (ISY) expenditures. Almost all funds were expended, but some Youth Employment Program (YEP) funds were returned due to late receipt from the State. Preparations for PAR are underway, and the annual audit is scheduled for later this month, with preliminary reviews to be run beforehand.

- Program Year 2024 Budget Update: Jennifer Bane noted the detailed budget update shows the expenditures by budget category. We came in under budget on all categories, so we have more Title I funding to rollover into this year. The savings are primarily due to receiving Statewide funds and other special grants which help offset costs.
- Program Year 2025 Budget Update: Jennifer presented the Program Year 2025 budget updates which reflect final allocations and final carryover totals. The budget reflects approximately $1.2 million in carryover, mostly Title I and about $130,000 in National DW grant, which is entering its final 15 months. Title I allocations changed slightly totaling $1.4 million. The operating budget is about $2 million with changes due to updated partner shares through the IFA. Statewide funding may help if we have the opportunity to request more, but the budget should be good regardless. YEP funds have been added. Justice involved and apprenticeship funds are still pending and not included. GROWWTH is also entering its final 15 months.

Program Oversight Report: Director of Operations, Ariel McGahey, reported that staff are in the process of completing the six-month monitoring reports for January-June 2025 for Dyersburg State Community College, Career Service Provider (CSP), and Mid-Cumberland Human Resource Agency, One-Stop Operator (OSO). No major concerns for either CSP or OSO. Final copies of the reports will be provided at the next meeting.

- Monitoring Policy Changes: The committee reviewed proposed changes to the Monitoring Policy. We are reviewing our policies to make sure they align with the state's recent changes to their policies. A section has been added for corrective actions and sanctions for non-compliance. Corrective action allows us to minimize risk.
  - **MOTION**: **Rita Alexander moved to approve the Monitoring Policy changes as presented, and Jimmy Williamson seconded the motion. All were in favor and the motion carried.**
- MPCR Policy Changes: This policy has been updated to reflect that the state now takes additional grants besides just Title I funding into account to determine the Minimum Participant Cost Rate (MPCR).
  - **MOTION**: **Rita Alexander moved to approve the MPCR Policy changes as presented, and Jimmy Williamson seconded the motion. All were in favor and the motion carried.**

Career Services Provider (CSP) Procurement: Jennifer Bane reported that we are due to procure the CSP again, and recommended using a third-party to manage the process as we have done in the past.

- Timeline: Jennifer reviewed the attached draft CSP procurement process and timeline. Even though we did take over the Career Service Provider internally in Southwest, this has been a huge undertaking and things are currently working very well in NW.
- Participant Payroll: The only complaint with the current CSP structure is DSCC's monthly payroll, which work experience participants and worksites often dislike. It also makes it harder for worksites hosting participants from both NW and SW, since SW participants are paid weekly. Using a third-party to manage NW payroll would require a separate RFP and additional costs. A third-party could handle hiring and payroll for work experience, allowing participants to be paid more frequently than once a month. DSCC can also only hire participants aged 16 and up, limiting younger youth work experience participants. Jennifer will look at the budget and provide more information at the next meeting for the committee's consideration.

Other Business:

- Officer Elections: Jennifer Bane reported that the Chair, Vice-Chair and Secretary positions will be up for election/re-election in September and asked that any volunteers or nominations be sent to her. The Chair and Vice-Chair are required to be private sector representatives. Jimmy, Ted, and Brad have all been nominated to stay in their current positions, but nominations are still open.

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

Respectfully submitted,
Lana Burchfiel
Public Information Specialist

Northwest TN Workforce Board
Executive Committee
Tuesday, August 5, 2025 – 10:15 a.m.

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

Join Zoom Meeting
Meeting ID: 817 8846 0321
Passcode: 515442

Agenda

Welcome and Call to Order — Ted Piazza, Chair

a. Opportunity for Public Comment (limit of three minutes per speaker)

Review and Approval of Minutes of 5/6/2025 Meeting **(Vote Required)**

Facilities and Technology Report — LeAnn Lundberg, Director of Facilities & Computer Services

- Relocation and Re-Designation of the Dyersburg AJC

Performance & Compliance Report — Laura Speer, Director of Performance & Compliance

- Quarterly Complaint Logs Update
- Monitoring Status Report
- Data Validation Update
- Local Performance - Estimated PY 24 Q4 Results

Budget & Administration Report

- Financial Status Report — Gina Johnson, Director of Finance & Admin. Services
- Program Year 2024 Budget Update — Jennifer Bane, Executive Director
- Program Year 2025 Budget Update — Jennifer Bane

Program Oversight Report — Ariel McGahey, Director of Operations

- Career Service Provider (CSP) Performance
- One-Stop Operator (OSO) Performance
- Monitoring Policy Changes **(Vote Required)**
- MPCR Policy Changes **(Vote Required)**

Career Services Provider (CSP) Procurement — Jennifer Bane

- Timeline
- Participant Payroll

Other Business — All

- Officer Elections

Future Meeting Dates & Upcoming Events

Meeting / Event	**Date and Time**	**Location**
State Workforce Board Meeting	August 22nd, 8:30am – 12pm	Nashville / YouTube
Virtually Speaking Webinar	September 4th, 9:00 am	Zoom
Northwest TN Workforce Board Meeting	September 9th, 10:00 am	NW HRA / DD (Martin) / Zoom
Remaining 2025 Committee Meetings	10:15 am on Tuesday, November 4th	Milan Chamber / Zoom
Remaining 2025 Board Meeting Dates	10:00 am on Tuesday, Dec. 2nd (with Southwest)	TBD / Zoom

Northwest TN Workforce Board Executive Committee Meeting
May 6, 2025 – 10:15 a.m.
Milan Chamber of Commerce, 1069 S. Main St., Milan, TN / Zoom
Chair- Ted Piazza, Vice-Chair- Jimmy Williamson

Minutes

Committee Members Attending: Ted Piazza; **via Zoom:** Jimmy Williamson, Rita Alexander, Benton County Mayor Mark Ward (CLEO)
Staff Members and Contractors Attending: Jennifer Bane, Ariel McGahey, LeAnn Lundberg, Laura Speer; **via Zoom:** Lana Burchfiel
Welcome and Call to Order / Public Comment / Review and Approval of Minutes of 2/11/25 Meeting: Ted Piazza welcomed everyone and asked if there were any public comments. Hearing no public comments, Ted presented the minutes from the last meeting and asked the group for any feedback or changes:

- <u>MOTION</u>: **Rita Alexander moved to approve the 2/11/25 Executive Committee minutes as presented, and Jimmy Williamson seconded the motion. All were in favor and the motion carried.**

Facilities and Technology: LeAnn Lundberg reported we have received confirmation that we are approved, and staff are able to use texting again. New Surface Pros for board staff were ordered and are being distributed. She is also looking at updating some AJC printers and resource computer updates. LeAnn announced she will be reducing her hours but will remain on staff rather than retiring.

- <u>Potential Relocation of the Dyersburg AJC</u>: Margaret Prater is helping to look at relocating since we have been told the rent at the current location will be going up "significantly," as well as ongoing issues with the current building. We have looked at several locations, and the most promising is the Vocational Rehabilitation building in Dyersburg. The only downside is there is not good signage and it's a harder-to-find location. They have ample office space, conference room, and break area. Currently the total rate is slightly more than $100,000, not including utilities, versus our current rent of $49,500 including utilities. We are waiting for Vocational Rehabilitation to follow up with an official quote of what our share of the rent would be. Since the building already has state wiring, LeAnn said that may help expedite the move. We are required to have at least one comprehensive center per area, and we currently have one in Dyersburg and Huntingdon. We will probably recommend designating Dyersburg as an affiliate location, which will give us some flexibility with what staff are required to be there. We are waiting for both locations to tell us potential pricing and will keep the board updated.

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

- <u>Quarterly Complaint Logs</u>: No complaints have been received, and reports have been submitted to the State.
- <u>Monitoring Status Report</u>: The full report is attached. There were no issues.
- <u>Data Validation Update</u>: The three-page handout shows where we were and the corrected error rate after Laura had reviewed them. The only one she is still uncertain about is Wagner Peyser since those are reviewed by State staff. The official results will be released by the state soon.
- <u>Local Performance Results—Estimated PY24Q3 Results</u>: The attached report of estimated results was reviewed. Laura runs predictive reports for these measures, and if she sees a negative, she can check for keying errors or missing documents and have staff make corrections. These corrections will show at the end of the program year. The only thing off-target is DW median wage, but there is nothing we can do about that. Laura said that the projected rate shows it will meet the target by the end of the program year. The projection for MSG for Youth shows an increase as well. Everything else in projections shows us still meeting our goals at the end of the program year.

Budget & Administration Reports:

- <u>Financial Status Report</u>: Jennifer Bane presented the attached Financial Status Report detailing expenditure and obligation rates as of March, as well as fiscal performance results for the minimum participant cost rate (MPCR), Youth Work Experience expenditures, and In-School Youth (ISY) expenditures. We should carry over more funds this year than originally projected due to additional participant funding awarded in January. The MPCR now includes other expenditures beyond formula funding and is a more accurate reflection of how the funds are being spent. Connie Stewart is working on getting more Out of School Youth enrollments to decrease the ISY expenditure rate.

- Program Year 2024 Budget Update: Jennifer Bane noted the detailed budget update shows the expenditures by budget item.
- Program Year 2025 Budget: Jennifer presented the proposed budget for Program Year 2025. The estimated carry-over amount is based on spending every dollar available in the budget, so that is the bare minimum we would carry over and it will likely be more. Our allocations did not decrease much. Overall, our Title I budget is down, but when we get the real carryover figures that will look better. Carryover for the DWG and one more year of the GROWWTH grant is included, and the addition of the new Rural Health grant. There are several other pending grants like additional YEP, apprenticeship, justice-involved, etc. that will help if received. A new potential Micro-credentialing grant is also supposed to be released, but exact details haven't been shared yet.
  - **MOTION**: **Jimmy Williamson moved to approve the Program Year 2025 Budget as presented, and Rita Alexander seconded the motion. All were in favor and the motion carried.**

Proposed Changes to the Bylaws: Jennifer Bane presented the proposed changes to the Bylaws as outlined in red in the attachment. More details were added to the open meeting requirements section, including detailed rules regarding public comment, and requests for public records and charges for providing those records. Jennifer asked if the group would like to require proof of citizenship for records request and it was not deemed necessary.

- **MOTION**: **Jimmy Williamson moved to approve the changes to the Bylaws as presented, and Rita Alexander seconded the motion. All were in favor and the motion carried.**

Program Oversight Report: Ariel McGahey reported that staff completed 6-month monitoring reports for Dyersburg State Community College (Career Services Provider) and Mid-Cumberland Human Resource Agency (One-Stop Operator) for July 2024—December 2024. There were no issues for either contract that they needed to address, and Ariel continues to meet with them monthly to monitor progress.

Other Business:

- Officer Elections: Jennifer Bane reported that the Chair, Vice-Chair and Secretary positions will be up for election/re-election in September and asked that any volunteers or nominations be sent to her. The Chair and Vice-Chair are required to be private sector representatives.

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

Respectfully submitted,
Lana Burchfiel
Public Information Specialist

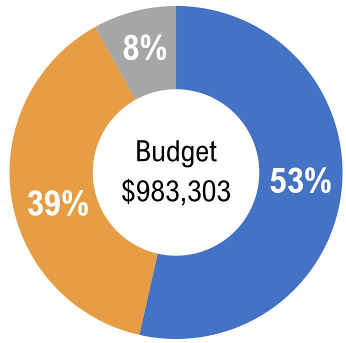
Northwest TN Workforce Board MONITORING STATUS REPORT					
Subcontractor	**Purpose of Subcontract**	**Scheduled**	**Date of Review (s)**	**Corrective Action Needed**	**Letter Mailed:**
2411-2510-OJT-54-2139412 Allegion/Republic Doors and Frames Monte Bowers or Chad Brawner 155 Republic Drive McKenizie, TN 38201 (731) 352-1945 chad.brawner@allegion.com	On-the-Job Training: 11-06-24 to 10-01-25	Scheduled: 01-27-25	Phone Interview: 01-27-25 Fiscal: 04-03-25	N/A	Letter Mailed: 04-04-25
2411-2511-OJT-26-2730204 Excel Boat Company, LLC Attn: Tiffinie Mosley-Hix, HR Manager 601 Sherwood Drive Union City, TN 38261 (731) 507-0390 tiffinie@excelboats.net	On-the-Job Training: 11-18-24 to 11-17-25	Scheduled: 12-04-24	Phone Interview: 12-04-24 Fiscal: 04-23-25	N/A	Letter Mailed: 04-23-25
2412-2504-OJT-62-1576561 Hornsby's Garage Inc. Terry Hornsby 820 West Main Street Union City, TN 38261 (731) 335-2020 hornsby@bellsouth.net	On-the-Job Training: 12-03-24 to 04-01-25	Scheduled: 01-29-2025	Phone Interview: 01-29-25 Fiscal: 05-14-2025	N/A	Letter Mailed: 05-15-2025
2407-2507-OJT-47-3701669 Auston Mealer's Restaurant Equipment Service 1865 US Highway 51 By-Pass North Dyersburg, TN 38024 Loretta Mealer, Administration (731) 445-4380 loretta@austonmealer.com	On-the-Job Training: 07-30-24 to 07-29-25	Scheduled: 08-13-24	Phone Interview: 08-13-24 Fiscal: 05-20-25	N/A	Letter Mailed: 05-20-25
RFP CONTRACTACTS					
2206-2306-CSP-62-0800930-MULTI Dyersburg State Community College 1510 Lake Road Dyersburg, TN 38024 Dr. Cook, President	Career and Business Services	Dates: 06-27-22 to 06-30-26		Invoices Checked Monthly per Executive Director	
2306-2406--OSO-62-0923487-SHARE Mid-Cumberland Human Resource Agency 1101 Kermit Drive, Suite 300 Nashville, TN 37217 jhamrick@mchra.com (615) 850-3907	One-Stop Operator Services:	Expires: 06-30-26		Invoices Checked Monthly per Executive Director	

Performance & Fiscal

On Target | Approaching Target | Off Target

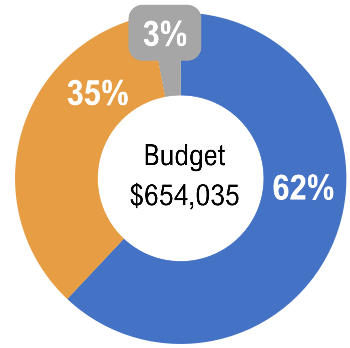
	Adult	Dislocated Worker	Youth
Employment Rate 2nd Quarter After Exit	92.3% Goal 92.2%	100.0% Goal 83.5%	82.0% Goal 87.7%
Employment Rate 4th Quarter After Exit	91.3% Goal 86.2%	81.3% Goal 78.4%	89.4% Goal 80.0%
Median Earnings 2nd Quarter After Exit	$8,712.00 Goal $8,500	$7,800.00 Goal $8,540	$4,260.00 Goal $3,922
Credential Attainment Within 4 Quarters After Exit	81.9% Goal 78.6%	75.0% Goal 69.8%	91.1% Goal 69.8%
Measurable Skills Gain	74.8% Goal 77.4%	78.6% Goal 90.1%	60.0% Goal 72.6%

Adult



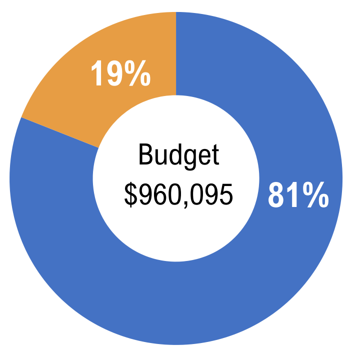
Expended	$523,729
Obligated	$377,328
Balance	$82,246

Dislocated Worker



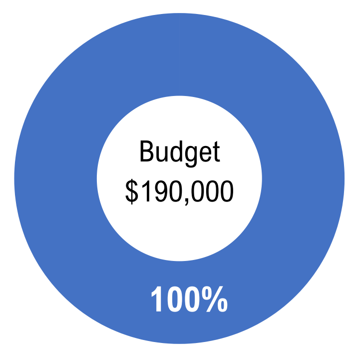
Expended	$402,302
Obligated	$230,226
Balance	$21,507

Youth



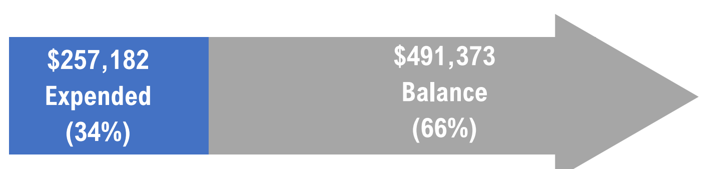
Expended	$777,431
Obligated	$182,247
Balance	$417.00

Statewide

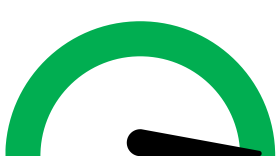


Expended	$190,000
Obligated	$0
Balance	$0

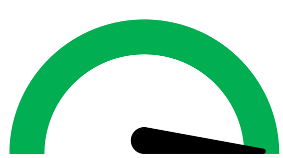
$1 Million Title I Operating Budget



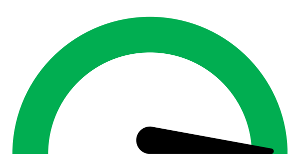
$748,555 Title I Participant Budget



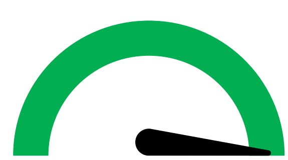
53.8% / 40%
MPCR



35.1% / 20%
Work Experience



45.8% / 35%
PY23 In-School Youth



51.9% / 35%
PY24 In-School Youth

Northwest PY 2024 Budget - Revised Aug. 2024
vs. YTD Expenditures as of 6/30/25

	Budget	July - Sept. 2024 Expenses	Percentage of Budget	Oct. - Dec. 2024	Percentage of Budget	Jan. - Mar. 2025	Percentage of Budget	Apr. - June 2025	Percentage of Budget	PY 24 YTD Total	Percentage of Budget	Estimated Carryover
Administrative Budget (all grants)	**$ 381,527.06**	$ 70,493.98	**18%**	$ 66,754.52	**17%**	$ 85,758.36	22%	$ 88,627.24	23%	**$ 311,634.10**	**82%**	$ 69,892.96
Formula Participant Budget	**$ 748,554.46**	**$ 84,485.00**	**11%**	**$ 114,063.24**	15%	**$ 36,879.46**	5%	$ 21,753.85	3%	**$ 257,181.55**	**34%**	**$ 491,372.91**
										Participant YTD =	24.46%	
Operating Budget	**$ 1,020,337.63**	**$ 255,084.41**	25%	**$ 255,084.41**	25%	**$ 255,084.41**	25%	**$ 255,084.41**	25%	**$ 1,020,337.63**	**100%**	**$ -**
IFA Expenses (including OSO)	$ 86,162.63	$ 18,710.98	22%	$ 17,768.98	21%	$ 17,393.38	20%	$ 20,748.07	24%	$ 74,621.41	87%	$ 11,541.22
Career Service Provider (w/o DWG)	$ 580,000.00	$ 99,242.08	17%	$ 116,950.85	20%	$ 105,863.28	18%	$ 102,061.84	18%	$ 424,118.05	73%	$ 155,881.95
Board / Fiscal Agent Expenses	$ 354,175.00	$ 73,916.43	21%	$ 69,148.55	20%	$ 81,088.98	23%	$ 71,519.89	20%	$ 295,673.85	83%	$ 58,501.15
Total Operating Expenses	**$ 1,020,337.63**	**$ 191,869.49**	**19%**	**$ 203,868.38**	20%	**$ 204,345.64**	20%	**$ 194,329.80**	19%	**$ 794,413.31**	**78%**	**$ 225,924.32**
Remaining Balance	*$ -*	*$ 63,214.92*	6%	*$ 51,216.03*	*5%*	*$ 50,738.77*	*5%*	*$ 60,754.61*	6%	*$ 225,924.32*	*22%*	*$ 225,924.32*
										Operations YTD =	75.54%	
Adult & DW Part. & Program	**$ 1,277,889.39**	$ 195,202.09	15%	$ 210,726.26	16%	$ 195,811.90	15%	$ 141,786.75	11%	$ 743,527.00	58%	$ 534,362.39
Youth Part. & Program	**$ 491,002.70**	$ 81,152.40	17%	$ 87,205.36	18%	$ 65,413.20	13%	$ 74,296.90	15%	$ 308,067.86	63%	$ 182,934.84
Total Part. & Program	**$ 1,768,892.09**	**$ 276,354.49**	**16%**	$ 297,931.62	17%	$ 261,225.10	15%	$ 216,083.65	12%	**$ 1,051,594.86**	**59%**	$ 717,297.23
Remaining Balance	*$ -*	*$ 1,492,537.60*	84%	*$ 1,194,605.98*	*68%*	*$ 933,380.88*	*53%*	*$ 717,297.23*	41%	*717,297.23*	*41%*	*41%*
Adult & DW Program Only	**$ 695,235.43**	$ 120,951.70	17%	$ 133,591.09	19%	$ 147,389.20	21%	$ 143,970.75	21%	$ 545,902.74	79%	$ 149,332.69
Youth Program Only	**$ 325,102.20**	$ 70,917.79	22%	$ 70,277.29	22%	$ 56,956.44	18%	$ 50,359.05	15%	$ 248,510.57	76%	$ 76,591.63
Total Program	**$ 1,020,337.63**	**$ 191,869.49**	**19%**	$ 203,868.38	20%	$ 204,345.64	20%	$ 194,329.80	19%	**$ 794,413.31**	**78%**	$ 225,924.32
Remaining Balance	*$ -*	*$ 828,468.14*	81%	*$ 624,599.76*	61%	*$ 420,254.12*	*41%*	*$ 225,924.32*	*22%*	*$ 225,924.32*	*22%*	*22%*

Northwest PY 25 Budget Revised July 2025	Admin. (Title I + State $)	Adult Prg (w/ Adult Transfer)	DW Prg (w/o AT)	Youth Program	Title I Program Total	Total Title I Budget	QUEST DWG	YEP	Rural Health	GROWWTH	Total Budget
Estimated PY 24 Carryover	$ 174,238.05	$ 611,156.58	$ 100,149.29	$ 182,664.14	$ 893,970.01	$ 1,068,208.06	$ 129,936.24	$ -		$ -	**$ 1,198,144.30**
PY 25 Allocations*	$ 140,694.20	$ 504,108.90	$ 277,555.50	$ 484,583.40	$ 1,266,247.80	$ 1,406,942.00	$ -	$ 342,222.00	$ 86,000.00	$ 506,887.28	**$ 2,342,051.28**
Total PY 24 Funding Available	**$ 314,932.25**	**$ 1,115,265.48**	**$ 377,704.79**	**$ 667,247.54**	**$ 2,160,217.81**	**$ 2,475,150.06**	**$ 129,936.24**	**$ 342,222.00**	**$ 86,000.00**	**$ 506,887.28**	**$ 3,540,195.58**
Difference from PY 24	*$ (146,277.61)*	*$ 85,229.15*	*$ (47,781.18)*	*$ 176,244.84*	*$ 213,692.81*	*$ 67,415.20*	*$ (317,050.19)*		*$ 86,000.00*	*$ (276,884.85)*	*$ (124,169.07)*
IFA Expenses (including OSO)	$ 2,328.22	$ 42,050.70	$ 4,029.86	$ 33,524.51	$ 79,605.07	$ 81,933.29	$ 11,525.21	$ -	$ -	$ 50,814.15	**$ 144,272.65**
Career Service Provider	$ -	$ 368,000.00	$ 71,000.00	$ 105,000.00	$ 544,000.00	$ 544,000.00	$ 63,739.83	$ 45,000.00	$ 6,250.00	$ 386,621.50	**$ 1,000,611.33**
Board / Fiscal Agent Expenses	$ 312,604.03	$ 249,210.00	$ 66,328.20	$ 67,861.80	$ 383,400.00	$ 696,004.03	$ 5,607.49	$ 6,333.00	$ 6,250.00	$ 69,451.63	**$ 777,313.15**
Total Operating Expenses*	**$ 314,932.25**	**$ 659,260.70**	**$ 141,358.06**	**$ 206,386.31**	**$ 1,007,005.07**	**$ 1,321,937.32**	**$ 80,872.53**	**$ 51,333.00**	**$ 12,500.00**	**$ 506,887.28**	**$ 1,922,197.13**
**May be adjusted between line items / programs*						*$ 0.90*					
Balance for Participants (Minus PY 26 Q1 Expenses)*		$ 389,296.81	$ 236,346.73	$ 460,861.23	**$ 1,086,504.77**		$ 49,063.71	$ 290,889.00	$ 73,500.00	$ -	**$ 1,160,004.77**
				Participant % of Program Funds	*55.4%*						
Difference from PY 24		*$ (249,177.66)*	*$ (61,157.82)*	*$ 277,099.20*	*$ (33,236.27)*	*$ -*	*$ (43,608.91)*		*$ 73,500.00*	[redacted]	*$ (52,408.89)*

adequate firewalls as an internal control to ensure integrity in decision making, compliance with WIOA, corresponding regulations, and relevant OMB circulars:

Board / Fiscal Agent Staff

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

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

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

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

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

Service Provider Staff

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

- Provide direct services including but not limited to participant intake, orientation, initial assessments, employment services, and referrals to other partners and services.
- Provide individualized direct services including but not limited to comprehensive and specialized assessments, case management, individual employment plans, career planning and vocational counseling.

correct the violation and documentation of non-compliance is required. Observations or areas of concerns are not specific compliance violations but may have negatively impacted program or could lead to a finding in the future. They may include activities related to effectiveness objectives or indicators that have not been met and could possibly result in a finding at some later point if not addressed. Typically, no corrective action is specified but suggestion for improvement may be made.

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

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

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

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

Submission of Quarterly Monitoring Reports

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

Corrective Actions and Sanctions for Non-Compliance

Not all actions or inaction result in non-compliance with federal and state regulations. However, there may be times when actions or inaction could create an increased risk for non-compliance. In these instances of increased risk, the Board will issue a “Notice of Risk” to help prevent or mitigate risk to avoid instances of non-compliance. Actions that warrant a “Notice of Risk” could include loss of key personnel, complaints from participants, external fraudulent activity (i.e. system hacking), etc. The “Notice of Risk” will not place service providers or subcontractors into a sanction level, but will require certain corrective actions. Actions that can be required from a “Notice of Risk” could include increased monitoring, submission of documents, change in procedures/policy, etc. Inability to adhere to the requirements listed in the “Notice of Risk” will lead to sanctions as indicated in this policy.

The Board may also issue a notice of non-compliance ranging from category 1 to category 4, depending on the severity of an infraction, in accordance with TDLWD policy. Noncompliance will generally be addressed by the Corrective Action Plan process; however, the Board may impose sanctions when necessary. In such circumstances, the Board may issue a Notice of Sanctions containing the sanctionable act(s) upon which the sanctions are based, the sanction level, the actions and deadlines necessary to remove the sanction, and instructions detailing rights to an appeal. Sanctions will be imposed in accordance with TDLWD policy based on the category of the infraction. Sanctions may also be imposed for debts owed beyond 90 days.

Subcontractor debt is established when the Board determines either through project management, fiscal or performance monitoring, or audit review that a previously reimbursed expense is unreasonable or unallowable in accordance with applicable federal and state requirements and guidelines. Once a debt is established, the subcontractor is required to make repayment in full of those costs. Debts may be paid by a reduction in future payments when possible. In instances where repayment by payment reduction is not feasible, debts may be paid to the Board from non-federal resources. An installment agreement, not to exceed 36 months, may be negotiated if payment cannot be made within 30 calendar days. The use of stand-in costs may be considered as a substitute for disallowed costs in audit or other debt resolution situations. Stand-in costs must be from non-federal sources that may be substituted for WIOA expenditures questioned or disallowed costs.

Appeals Process

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

(1) Any disputes shall first be attempted to be resolved informally.
(2) Should informal resolution efforts fail, the appeal process must be formally initiated by the petitioner seeking resolution. The petitioner must send a notification to the LWDB Chair (or designee) regarding the conflict within 10 business days.
(3) The LWDB Chair (or designee) shall place the dispute on the agenda of a special meeting of the LWDB's Executive Committee. The Executive Committee shall attempt to mediate and resolve the dispute. Disputes shall be resolved by a 2/3 majority consent of the Executive Committee members present.
(4) The decision of the Executive Committee shall be final and binding unless such a decision is in contradiction of applicable State and Federal laws or regulations governing the contractor and / or sub-recipient agencies.
(5) The right of appeal no longer exists when a decision is final. Additionally, final decisions will not be precedent-setting or binding on future conflict resolutions unless they are officially stated in this procedure.
(6) The Executive Committee must provide a written response and dated summary of the proposed resolution to all parties.
(7) The LWDB Chair (or designee) will contact the petitioner and the appropriate parties to verify that all are in agreement with the proposed resolution.

Reference: 2 CFR 200.331

Related TDLWD Policy:

WFSPolicyMonitoring.pdf (tn.gov) (effective 11-13-20)

WFSGuidanceLocalWorkforceDevelopmentBoardMonitoringActivities.pdf (tn.gov) (effective 3-20-18)

WFSPolicyDataValidation.pdf (tn.gov) (effective 11-13-20)

~~2022-2023 WIOA Monitoring Guidance (tn.gov) (effective 10-1-22)~~

Workforce Services Policy: Corrective Actions and Sanctions for Non-Compliance (effective 2/28/25)

Vetted and Approved by the Local Workforce Development Board: ~~June 4, 2024~~ September 9, 2025

Jimmy Williamson, Chair, Northwest Tennessee Workforce Board

Minimum Participant Cost Rate

Effective Date: ~~February 28, 2023~~ September 9, 2025
Duration: Indefinite

Purpose: To establish a policy to ensure a minimum of 40% of ~~WIOA Title I formula allocation~~ qualifying Federal, State, or local funds are expended on allowable direct participant costs by the end of each program year.

Policy: In accordance with Workforce Services Policy – Minimum Participant Cost Rate (MPCR), the LWDB adopts this State Policy and all subsequent updates as its local performance accountability measure (WIOA, Section 116(b)(2)(B)). Link below.

Further, the LWDB ensures a minimum of 40 percent of their ~~WIOA Title I formula~~ qualifying allocations will be expended on allowable participant costs ~~under WIOA funded services~~. Qualifying expenditures are those that represent direct benefit to participants and do not include administrative, personnel staff, or operating costs of the LWDB, one-stop operators, and/or contracted service providers. For all other types of allowable ~~WIOA funded~~ services not mentioned in TDLWD WFS Policy Minimum Participant Cost Rate, the LWDB or staff will request clarification from the TDLWD staff to determine if the costs can be included in the minimum expenditure calculation. The MPCR will be calculated and recorded monthly to ensure compliance by the end of the program year.

Reference: WIOA, Section 116(b)(2)(B)

Related TDLWD Policy: Minimum Participant Cost Rate (MPCR) Link below.

~~https://www.tn.gov/content/dam/tn/workforce/documents/wfs/WFSPolicy-MinimumParticipantCostRate(MPCR).pdf (effective 11-8-19)~~

https://www.tn.gov/content/dam/tn/workforce/documents/contact-02/Minimum-Participant-Cost-Rate-Policy.pdf (effective 2/28/2025)

Vetted and Approved by the Local Workforce Development Board: ~~February 28, 2023~~ September 9, 2025

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Jimmy Williamson, Chair
Northwest Tennessee Workforce Board

DRAFT CSP Procurement **Process** and **Timeline**

Workforce Board Approval of RFP Process	September 9, 2025
Procure / Select Third-Party Procurer	December 15, 2025
RFP Release	January 30, 2026
Deadline for Bidders Questions	February 15, 2026
Response to Bidder Questions Posted Online	February 22, 2026
Proposal Deadline (email only)	March 31, 2026
Third-Party RFP Committee Review	April 1-13, 2026
Executive Committee Review & Recommendation	May 5(?), 2026
Workforce Board & LEOs Review & Selection	June 9(?), 2026
Notification to all Bidders	June 12, 2026
Contract Begin Date	June 22, 2026