

Program Year 2016 Local Transitional Plan for Local Workforce Development Area 12

*Serving the Counties of Benton, Carroll, Crockett, Dyer, Gibson,
Henry, Lake, Lauderdale, Obion, Tipton, and Weakley*



Open for Public Comment April 3, 2017 – May 2, 2017

Submit comments or questions in writing to:

Northwest Tennessee Workforce Board

Attn: Jennifer Bane

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Dyersburg, TN 38024

jbane@nwtworks.org

Any comments received in relation to the content of the draft transitional Program Year 2016 local plan will be addressed within the plan prior to submission to the TN Department of Labor and Workforce Development (TDLWD).

Describe the consortium agreements, as defined by WIOA 107(d)(11), in place between the local board and the TN Department of Human Services, Office of Rehabilitation Services with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers, and other efforts of cooperation, collaboration, and coordination [WIOA Sec. 108(b)(14)].

The Northwest Tennessee Workforce Board (NWTNWB) enters into Memorandums of Understanding (MOUs) with each partner operating in the local area in order to address the services offered and the method of service delivery - on-site or by referral. The purpose of the MOU among partners is threefold:

- (1) To establish a cooperative and mutually beneficial relationship among Agencies: to implement their individual and mutual duties;
- (2) To ensure that all individuals seeking services at American Job Centers (AJCs) are provided services through operations that are mutual to all Partners programs, and to ensure that these individuals are also referred to program services which are unique to the Partners' programs;
- (3) To establish methods of referral of individuals between all LWDA 12 American Job Centers and the consortia partners for the appropriate services and activities.

Additionally, the scope of services outlined in the MOU follows Workforce Services Division Policy #7 regarding Service Integration and functional alignment wherein Tennessee's American Job Center (AJC) system shall strive to streamline workforce services functions, prevent the duplication of services and eliminate inefficient practices. To this end, Partners agree:

- (1) To endorse a single customer flow model based on customer need, not program requirements;
- (2) To refer customers between Partners by methods listed in the Agreement;
- (3) To authorize the sharing of customer data and information in order to facilitate co-enrollment and case management across programs and funding streams.

By establishing agreements detailing the services each partner program provides, staff are able to maximize services to customers by making appropriate referrals, avoiding duplication of services, and sharing resources. A MOU developed in 2014 is currently in place between the local workforce development board (LWDB) and the TN Department of Human Services, Office of Vocational Rehabilitation Services, and will be updated following new TDLWD guidelines by May 3, 2017.

In addition to the MOU in place between the LWDB and Vocational Rehabilitation Services, a cooperative agreement is also in place between the two agencies. This agreement allows for the two agencies to enhance the provision of services to individuals with disabilities, and to other individuals, through cooperation, collaboration, and coordination regarding the cross training of and technical assistance for staff, the use and sharing of information, cooperative efforts with employers, and utilization of MOUs and Resource Sharing / Infrastructure Agreements. For instance, the cooperative agreement details that the parties to the agreement shall cooperate, collaborate, and coordinate to market and deliver services to employers in the local area and carry out activities of the local Business Services unit. Each agency has a representative serving on the Business Services team to ensure a comprehensive set of services is presented to local businesses. Likewise, each agency has staff members serving on the Career / Skills Development team to ensure job seekers are offered all appropriate services.

Identify the entity responsible for the disbursement of grant funds [WIOA Sec. 108(b)(10)].

The NWTNWB staff members are employees of Dyersburg State Community College (DSCC), which was selected as Administrative Entity/Fiscal Agent for the WIOA grant funds by a Consortium of Chief Elected Officials (CEO). The CEO Consortium petitions the Governor each program year for a waiver enabling

DSCC to act in the dual role of training provider and Administrative Entity/Fiscal Agent. DSCC employees are accountable to the policies and procedures of the Tennessee Board of Regents. As the designated entity, DSCC, in accordance with Sec. 107(d){12}{B}{III} shall disburse the grant funds for workforce investment activities at the direction of the local board, pursuant to the requirements of this title. The entity designated shall disburse the funds immediately on receiving such direction from the local board. § 679.420 states that the designation of a fiscal agent does not relieve the chief elected official or Governor of liability for the misuse of grant funds. If the CEO designates a fiscal agent, the CEO must ensure this agent has clearly defined roles and responsibilities, therefore, CEOs and NWTNWB enter into an agreement with DSCC as the fiscal agent and administrative entity.

Describe the competitive and non-competitive processes, as well as the process for sole-sourcing, used for procuring goods and services within the local area. This includes, but is not limited to, the process used to award funds to a regional operator and other sub-recipients / contractors of WIOA Title I Adult, Dislocated Worker, and Youth Services [WIOA Sec. 108(b)(17)].

The NWTNWB follows the appropriate purchasing guidelines of the local fiscal agent, Dyersburg State Community College, and its governing body, the TN Board of Regents. The following methods are most commonly used by the NWTNWB to procure goods and/or services in accordance with the guidelines described below, as stated in the [TN Board of Regents' Purchasing Guideline – B:120](#):

- (1) Small Dollar Purchases - Institutions may make non-recurring purchases totaling less than \$10,000, cumulatively in expense or revenue, without documenting any quotes or proposals from multiple vendors.
- (2) Informal Solicitations - Except as provided in Section I of the policy, Institutions may make purchases totaling less than \$50,000 in expense or revenue based upon written, telephone or electronic bids. For purchases totaling \$10,000 - \$49,999.99, bids must be solicited from at least three (3) Responsive/Responsible Bidders/Proposers.
- (3) Formal Solicitations - A formal solicitation process shall be used when the estimated aggregate total of the expense or revenue is \$50,000 or more, including renewal terms of multi-year awards. The types of formal solicitations include 1) Request for Information (RFI); (2) Invitation to Bid (ITB)/Request for Quotation (RFQ); and (3) Request for Proposals (RFP), and are utilized in accordance within the guidelines set forth in the policy. For competitive procurement of goods, an ITB/RFQ is appropriate, and in general, a purchase order may be used to finalize the purchase. Except as permitted under Section VI.A.3.(2)(b), for competitive procurement of services, an RFP is more appropriate, and a purchase order is generally not sufficient to serve as the written contract for the services.
- (4) Procurements under Cooperatives - Pursuant to the Tennessee Interlocal Cooperation Act, T.C.A. § 12-9-101, Institutions may purchase goods and services through TBR System Office approved Cooperative Purchasing Agreements. The current approved list of TBR contracted cooperatives may be found at: <http://www.tbr.edu/purchasing/cooperatives>.
- (5) Non-Competitive Procurements - (A) Contracting with Another State/Governmental Entity. Personal, professional and consultant service contracts may be obtained by non-competitive negotiation when the contractor is a State Agency, a political subdivision of the state, or any other public entity in Tennessee, or an entity of the federal government. (B) Sole Source and Proprietary Purchases. Whenever specifications are not so worded or designed to provide for competitive bidding, a Sole Source or Proprietary Purchase may be allowed. A Sole Source Purchase is available only from a single Supplier; a Proprietary Purchase allows for a competitive procurement process to be used that specifies a particular good or service. Written justification for Sole Source or Proprietary Purchases must be submitted in writing for approval by the Chancellor, President, Director, or their designee. The TBR Justification for

Non-Competitive Purchases and Contracts Form must be completed and approved by the TBR System Office (when applicable) and additional documentation may also be required as a part of the request.

When making purchases for the American Job Centers (AJCs), fiscal staff review the request to determine if the item will be shared amongst partners in order to properly allocate the cost. All procurement policies follow TN Board of Regents as well as Federal guidelines and fiscal staff are trained on allowable and unallowable costs. Duties are properly segregated between employees responsible for purchasing, accounts payable, and cash disbursements. There are always two signatures on each purchase prior to submitting the information to the Administrative Entity for payment. Once entered into the system for payment, the Director of Finance and Administrative Services reviews the invoice for proper coding before approving it for payment.

Furthermore, each partner is required to contribute to the operating costs as described in the Resource Sharing Agreement, or RSA (to be updated to Infrastructure Agreements). Shared costs are identified and agreed upon at partner meetings and are proportionately distributed based on full-time equivalent, FTE, (communication, advertising, supplies, etc.) or square footage (utilities, building maintenance, lease, etc.). Proportionate share, cost allocation methodologies, and any additional considerations are determined and costs are billed to partners on a monthly basis. Actual costs are billed rather than estimates or budgeted amounts. Periodically, space, FTE, and any other contributing factors are reviewed to determine if the RSA needs to be modified. Fiscal staff also attend appropriate trainings, as offered, in order to ensure compliance with the Uniform guidance.

The NWTNWB may contract with various agencies, in accordance with WIOA Legislation and TDLWD policies, in order to provide services for eligible participants and employers through programs such as On-the-Job Training (OJT) Grants, Incumbent Worker Training (IWT) Grants, Youth Programs, and “Buy-out” classes. When awarding contracts through a competitive process, such as IWT grants and Youth program sub-contracts, the NWTNWB researches potential bidders, issues a Request for Proposal, receives proposals, reviews, and then awards competitive grants to providers based on identified scoring criteria. In order to provide more concentrated recruitment efforts and services, the fourteen required elements of Youth services are currently provided through a contract with Workforce Essentials, Inc., which was the result of a competitive process, in the eight larger counties of the service area. The staff to the local board offer limited Youth services in the three smaller counties in the area. The NWTNWB, on behalf of the entire West TN region including LWDA 11, 12, 13, also utilized a competitive process to select a facilitator for strategic planning services for all of West TN. Once it is determined that funds can be allocated for OJT/IWT grants or Buy-out classes, the NWTNWB has authorized administrative staff to initiate agreements or contracts with employers or appropriate community organizations.

Additionally, in order to select an Operator for the One-Stop system in the local area, consistent with WIOA Sections 107(d)(10) and 121(d) and the Workforce Services Policy regarding One-Stop Delivery and Design System, paragraph (D) of the Local Board Responsibilities section, and in accordance with the Regional Planning Council, the NWTNWB, with the agreement of the chief elected officials for the local area, shall designate or certify one-stop operators as described in section 121(d)(2)(A). In order to conduct a competitive process for the selection of a one-stop operator in accordance with 121(d)(2)(A), the Board, with the agreement of the CEOs, has issued a Request for Proposals for a designated time period, with public notice being provided through print media and / or electronic means, and with potential bidders being notified of the release by email. Proposals received shall be reviewed by a committee approved by the Board and CEOs. The review committee shall make a recommendation to the Board for selection of the Operator. The selected Operator shall enter into a contract with the Board and CEOs as developed by the fiscal agent.

Describe the local area's negotiated local levels of performance for the federal measures and their implications upon the local workforce system, to include attaching the completed Performance Targets Table [WIOA Sec. 108(b)(17)].

The NWTNWB's success is measured by Performance Standards developed by the US Department of Labor, which are broken out by the Adult, Dislocated Worker, and Youth funding streams. These standards are then negotiated with each of the states, including Tennessee. TDLWD then negotiates with the thirteen Local Workforce Development Areas across the State. On a local level, the NWTNWB holds youth subcontractors to the same performance levels. LWDA 12 has historically achieved performance at a level to be awarded incentive grants, including the most recent award for Program Year (PY) 14, however, targeting services to individuals with barriers to employment coupled with longer outcome measures and new performance standards, such as median earnings and credential attainment for Adults and Dislocated that have yet to be measured to establish a baseline, raise concerns about the ability to continue to meet performance requirements. The below table indicates the negotiated performance targets for PYs 2012 through 2015 under the Workforce Investment Act (WIA), as well as the negotiated targets for PYs 2016 and 2017 under the WIOA.

WIA Performance Metrics	LWIA 12 Negotiated Target PY 2012	LWIA 12 Negotiated Target PY 2013	LWIA 12 Negotiated Target PY 2014	LWIA 12 Negotiated Target PY 2015	WIOA Performance Metrics	LWDA 12 Agreed Target PY 2016	LWDA 12 Agreed Target PY 2017
Adult Measures					Adult Measures		
<i>Entered Employment</i>	83%	83%	85%	85%	<i>Employment Rate 2nd Quarter after exit</i>	80%	80.5%
<i>Employment Retention</i>	82%	82%	86%	86%	<i>Employment Rate 4th Quarter after exit</i>	75%	75.5%
<i>Average Earnings (6 Month Earnings)</i>	\$13,000 \$6,500	\$13,000 \$6,500	\$13,500 \$6,750	\$13,500 \$6,750	<i>Median Earnings 2nd Quarter after exit</i>	\$6,500	\$6,600
					<i>Credential Attainment within 4 Quarters after exit</i>	72.5%	73%
Dislocated Worker							
<i>Entered Employment</i>	90%	90%	91%	91%	<i>Employment Rate 2nd Quarter after exit</i>	83%	83.5%
<i>Employment Retention</i>	88%	88%	90%	90%	<i>Employment Rate 4th Quarter after exit</i>	79%	79.5%
<i>Average Earnings (6 Month Earnings)</i>	\$13,200 \$6,600	\$13,200 \$6,600	\$13,200 \$6,600	\$13,200 \$6,600	<i>Median Earnings 2nd Quarter after exit</i>	\$7,100	\$7,200
					<i>Credential Attainment within 4 Quarters after exit</i>	76.5%	77%
Youth Common Measure							
<i>Placement</i>	76.7%	76.7%	86%	86%	<i>Employment Rate 2nd Quarter after exit</i>	76%	76.5%
<i>Attainment</i>	70%	70%	85%	85%	<i>Employment Rate 4th Quarter after exit</i>	78%	78.5%
<i>Literacy/Numeracy</i>	48%	48%	48%	48%	<i>Credential Attainment within 4 Quarters after exit</i>	78.5%	79%

With high unemployment and poverty rates, and low educational attainment in the area, the AJCs in LWDA 12 serve many customers experiencing barriers to employment, requiring staff in the AJCs to be knowledgeable of partner programs and community resources and be prepared to help customers in successfully utilizing AJC services. Populations with barriers, typically served through the Welcome

Function and / or Career Development Function, often need staff assistance in order to address barriers such as lack of transportation, childcare, healthcare, education, and/or work ethic and become self-sufficient. Given the many needs of populations with barriers, specialized programs such as Re-Employment Services and Eligibility Assessment (RESEA) and Supplemental Nutrition and Assistance Program (SNAP E&T) are also incorporated into the AJCs to serve populations typically faced with multiple barriers. Because customers often need guidance and encouragement to take the next step in utilizing such resources, AJC staff must be sensitive to, and understanding of, the unique needs of the customers they serve, including both the job seeker and employer. Members of the Career Development Team and Business Services Team work together to meet both the needs of job seekers and the needs of employer by assisting job seekers in attaining the skills necessary to meet the job requirements of local employers.

Describe the indicators used by the local board to measure performance and effectiveness of the local fiscal agent, eligible providers and the AJC delivery system, in the local area. [WIOA Sec. 108(b)(17)].

Note: This description may include how and by whom the indicators are being deployed; and if the measured performance and effectiveness are used in the continuous improvement process.

Performance and Effectiveness of the Local Fiscal Agent

In accordance with WIOA Section 107(d)(12)(B)(i)(II), Dyersburg State Community College (DSCC) – a TN Board of Regents (TBR) institution, has been selected as the local fiscal agent for the WIOA grant funds by a Consortium of Chief Elected Officials (CEO). According to the agreement between the Local Elected Officials, NWTNWB, and DSCC, as the selected fiscal agent entity, DSCC’s responsibilities include:

- (1) Ensuring fiscal integrity and accountability for expenditures of funds in accordance with Office of Management and Budget circulars, WIOA and corresponding Federal Regulations and State Policies;
- (2) Maintaining proper accounting records and adequate documentation;
- (3) Conducting financial monitoring of service providers; and
- (4) Ensuring independent audits of all employment and training programs.

Additionally, DSCC is committed to the responsible stewardship of its resources and to maintaining a work environment that promotes ethical and honest behavior. To accomplish this, DSCC has established and implemented internal control systems and procedures to prevent and detect irregularities, including fraud, waste and abuse:

- (1) Internal Audit – Internal Audit is responsible for assessing the adequacy and effectiveness of internal controls that are implemented by management and will often recommend control improvements as a result of this assessment. During an audit of a department or process, Internal Audit will also perform tests designed to detect fraud, waste or abuse that may have occurred.
- (2) External Audits – The Tennessee Department of Audit, Division of State Audit, performs periodic financial audits. One purpose of this type of audit is to evaluate the institution’s internal controls, which will often result in recommendations for control improvements. State Audit will also perform tests designed to detect fraud, waste or abuse that may have occurred.
- (3) Other Reviews – Various programs may be subject to audits or reviews by federal, state or other outside agencies based on the type of program, function or funding. For instance, the WIOA Title I program is monitored yearly by the TDLWD’s Performance Accountability Review (PAR) team. This yearly monitoring is a comprehensive review of administrative and programmatic elements such as fiscal policies, participant services, local program and fiscal monitoring, and compliance with federal and state regulations.

The NWTNWB monitors the results of such audits and other reviews in order to measure the performance and effectiveness of the local fiscal agent.

Performance and Effectiveness of Eligible Providers

In the State of Tennessee, the Tennessee Department of Labor and Workforce Development (TDLWD) is charged by the State Workforce Development Board with the responsibility to develop and maintain the Eligible Training Provider List (ETPL). To receive funds under Title I of WIOA, a training provider must make application to the local Workforce Investment Board for approval to be included on the ETPL. LWDA 12 agrees to adopt the procedures and formats provided by TDLWD for accepting and processing applications for the ETPL. Said procedures include processes and formats for renewal applications for providers which have completed their period of initial eligibility, as well as processes for making initial application.

Interested training provider applicants shall visit the Eligible Training Provider website at www.Jobs4TN.gov to register and complete the appropriate application forms as provided by TDLWD within the system. Applicants must provide all requested performance, cost, credentialing, articulation documentation, or other information requested by the Committee and/or the NWTNWB. Upon receipt of completed applications, a Sub-Committee of the NWTNWB will review and make recommendation to the full NWTNWB or its Executive Committee for approval, denial or other additional/subsequent consideration. The Sub-Committee, other committees of the NWTNWB, or NWTNWB members may request any additional information from the applicant institution deemed necessary. The LWDB will review and approve applicants which are deemed to have met the criteria outlined in WIOA Subtitle B, Chapter 1, Section 122. If approved, the NWTNWB will submit appropriate information and recommendation for addition to the Statewide Eligible Training Provider List in the Jobs4TN system. Upon approval, training providers will be asked to complete a W-9 Request for Taxpayer Identification Number and Certification Form, as well as a Dyersburg State Community College Vendor Application Form, in order to be established as vendor in order to receive payments.

Eligible Training Providers are accountable to established performance standards in accordance with Workforce Services Policy #5 – Eligible Training Provider List and renewal applications must provide required performance data in order to remain on the ETPL. According to the policy, providers on the ETPL are required to submit quarterly performance reports to the State, which must contain individual level data for all participants in programs offered by the Eligible Training Provider that have serviced at least one student with the assistance of WIOA funding. Performance reporting is required for credential attainment, employment rates during 2nd and 4th quarters after exit, and median earnings during 2nd quarter after exit for all students as well as for WIOA participants.

Similarly, employers who are awarded On-the-Job Training (OJT) contracts will have performance periodically reviewed by the Business Services Team to ensure placement and retention standards, in accordance with the federal performance measure, are met and warrant continued approval of new OJT contracts and slots. Any employers who are found to have a pattern of failure regarding completion or retention of participants will discuss the contributing factors with a Business Services Team member to develop corrective action plans, if appropriate, in order to remain a provider of OJT.

Performance and Effectiveness of the AJC Delivery System

In addition to closely monitoring attainment of the federal performance measures as described above, to measure the performance and effectiveness of the AJC delivery system in the local area, the NWTNWB utilizes an American Job Center survey and an Employer survey. Notice regarding the American Job Survey is posted in each Center and includes the website for completing the survey online. Survey cards are also made available to each job seeker, who has the option of completing the survey and placing it into a locked collection box, or electronically completing the survey via Survey Monkey.

Survey cards placed into the collection box are keyed into Survey Monkey by administrative staff. Business customers are sent a link via e-mail to complete a survey in Survey Monkey based on the case notes and / or activity codes entered into Jobs4TN, an electronic case management system.

Both job seeker and employer surveys are shared with AJC partners and reviewed so that results can be analyzed and appropriate action taken. Survey results are also periodically posted on the system's website and social media pages, and any changes made because of the feedback are highlighted. While overall rankings of 4 or higher on a 5-point scale are considered successful, to see improvement, the percentage of customers providing such a rating is expected to be maintained or increased. Additionally, customer success stories are highlighted in an Annual Report, on social media accounts, and the Center's website.

Furthermore, the Greeter and various reporting features of the Virtual One-Stop (VOS), Jobs4TN, allow leaders of the local One-Stop system to monitor customer traffic and caseloads to ensure the AJC, including contractors, have sufficient staffing to provide the needed level of customer service. If needed, staff may be asked to work in an AJC outside of their home office or regular working hours to ensure Centers are prepared to administer services to customers as needed. AJC staff utilize work experience and volunteer programs available through partner programs such as Temporary Assistance for Needy Families (TANF) and the Senior Community Service Employment Program (SCSEP), and sometimes hire temporary staff to assist in delivering services if needed. The AJC focuses on streamlining and maximizing services to ensure all provisions under WIOA are implemented.

Describe the process used by the local board for the receipt and consideration of input into the development of the local plan in compliance with WIOA Sec. 108(d). Describe the process to provide an opportunity for public comment prior to submission of the local plan. Be sure to address how members of the public, including representatives of business, labor organizations, and education were given an opportunity to provide comments on the local plans [WIOA Sec. 108(b)(20)].

Prior to the date on which the local board submits a proposed local plan, the proposed local plan must be made available to members of the public through electronic and other means.

- ***Describe how the local board made the proposed local plan available for public comment [WIOA Sec. 108(d)(1)].***
- ***Describe how the local board collected and considered public comments for inclusion in the proposed local plan [WIOA Sec. 108(d)(2)].***
- ***If any comments were received that represent disagreement with the proposed local plan, include such comments within the local plan's attachments [WIOA Sec. 108(d)(3)].***

To receive and consider input into the development of the local plan, in compliance with WIOA Sec. 108(d), the NWTNWB's LWDA 12's PY 2016 Transitional Local Plan is being published for a 30-day comment period between April 3, 2017 and May 2, 2017, prior to submission of the plan on May 3, 2017. Public notice is being submitted for publication to 18 local newspapers in the 11-county service area and is being published on the organization's website, www.northwestncareercenter.org, and Facebook and Twitter pages. Additionally, the Director of Outreach and Advancement sends an electronic communication to all American Job Center partners, NWTNWB members (representing business, labor organizations, education, and others), standing committee members, and Local Elected Officials for review and comments. The plan is being made available to be viewed on the website and hard copies are being made available at all 11 AJCs in the local area during this time.

All comments are to be submitted in writing to a designated single point of contact, Jennifer Bane – Director of Outreach and Advancement, who will compile all comments received during the period of public comment and share them with board members and senior leaders for consideration and

integration into the plan as appropriate. Any comments received, including those that represent disagreement with the proposed local plan, will be included within the local plan's attachments.

List the name, organization, and contact information of the designated equal opportunity office for each AJC partner in the AJC within the local area.

Title I Adult, Dislocated Worker, and Youth

Laura Speer, Dyersburg State Community College /
Northwest TN Workforce Board
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Title II Adult Education

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Title III Wagner Peyser

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Title IV Vocational Rehabilitation

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Title I Youth Sub-Contractor / Temporary Assistance for Needy Families Administrator

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The local board attests to ensuring the compliance components / documents listed below are in place and effective prior to July 1, 2017.

Copies of the documents listed below will be submitted to the TDLWD along with the Program Year 2016 Transitional Local Plan by May 3, 2017 and may be requested for viewing by contacting Jennifer Bane at 731-286-3585, ext. 15 or at jbane@nwtworks.org.

- Agreement between all counties in the local area establishing the consortium of local elected officials;
- Agreement between the chief local elected officials and the fiscal agent, Dyersburg State Community College;
- Agreement between the chief local elected officials and the local workforce development board – the Northwest Tennessee Workforce Board;
- American Job Center Partner Service Agreements / Memorandums of Understanding (MOUs);
- Resource Sharing Agreements (RSAs) and RSA Budgets (to be replaced with Infrastructure Agreements);
- Local workforce development board policy and processes that provides for nomination, appointment, and removal of board members, resolutions, bylaws, code of conduct, and conflict of interest;

Financial management policy and processes including cost allocation plan, internal controls, cash management, receipts of goods, cost reimbursement, program income, travel reimbursement, audit requirements and resolution / debt collection, annual report, property management including inventory and equipment, and allowable costs;

Local procurement policy; and

Program management policy and process including equal opportunity for customers, support services, needs related payments, file management, eligibility, self-sufficiency criteria, individual training accounts, layoff assistance, priority of services, grievance for eligible training providers list, transitional jobs, stipends, and training verification / refunds.

Copies of the documents listed below will be made available as requested during monitoring and / or auditing and may be requested for viewing by contacting Jennifer Bane at 731-286-3585, ext. 15 or at jbane@nwtworks.org.

Risk management policy and process including records retention and public access, public records requests, monitoring, grievance, incident, and disaster recovery plan.

Human resources policy and process including employee classification, benefits, holidays and PTO, recruitment and selection, employee development, discipline, layoffs, terminations and severance, sexual harassment, and equal opportunity / non-discrimination.

No professional services contract(s) for administrative services such as staffing and payroll, are currently in place.