Northwest TN Workforce Board Executive Committee Meeting

January 25, 2023 – 10:00 a.m. Administrative Office, 208 N. Mill Ave., Ste. B, Dyersburg, TN 38024

Minutes

Committee Members Attending: Ted Piazza, Mayor John Penn Ridgeway via Zoom: Ben Marks
Staff Members Attending in person: Jennifer Bane, Gina Johnson, Lana Burchfiel; via Zoom: Ginger Powell, Laura
Speer

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

Review and Approval of Minutes: Minutes for the 10/26/22 meeting were reviewed.

• MOTION: Mayor Ridgeway moved to approve the 10/26/22 Executive Committee minutes as presented, and Ben Marks seconded the motion. All were in favor and the motion carried.

<u>Facilities and Technology Update</u>: Jennifer Bane reported remote software has been installed and is working well so far. LeAnn Lundberg is still working on inventory and has been addressing damage in SW after a pipe burst.

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

- Quarterly Complaint Logs: No complaints have been received.
- Monitoring Status Report: No issues to report. The full report is attached.
 - <u>CSP 6-Month Monitoring Report:</u> Monthly monitoring is continuing and we are working on a 6-month monitoring report.
- PAR & Data Validation Update: The PAR review is underway, and Data Validation is scheduled for the week of March 6th. Four representatives from Northwest (NW) and four from Southwest (SW) will participate. Last year we were able to appeal results due to information being present but not counted and met the required less than 5% error threshold. Jennifer Bane also noted that this year's PAR review will include a programmatic component with reviews of the AJCs and staff taking place during the on-site review.
- <u>Local Performance Results—Estimated PY22Q2 Results</u>: Laura reviewed the attached report of estimated results. Only one measure is below the required 90% threshold, but predictive reports indicate the measure will be met by the end of the program year as some old data will fall off. We have a small number of participants that fall into the Dislocated Worker population which can skew the numbers.

Budget & Administration Update:

- <u>Financial Status Report & Budget Update</u>: Gina Johnson presented the attached Financial Status Report. We will not receive any reimbursements and cannot request new reimbursements until the State gets our name changed on all contracts. We were not made aware of this in advance. Once the modifications to change the name are received and signed, we should receive the previously submitted reimbursement requests in about two weeks. We did not receive a timeline for when the modifications will be sent.
- One-Stop Operator Proposed Procurement Process & Timeline: Jennifer Bane presented the attached handouts detailing the scope of work and timeline for the selected procurement manager. Thomas P. Miller and Associates (TPMA) was the only entity to submit a proposal. Their timeline is slightly different from what Jennifer presented last time, but still within the timeframe needed.

Other Business: Jennifer Bane presented the following:

- Administrative Policy Manual Changes: This is a continuation of aligning NW and SW language, with only very minor changes proposed for the NW policies as outlined in red and green in the attached handouts. The green language is incorporated from SW policy. Other minor updates were made to reflect and refer to current State policy and processes, including an updated definition of relatives.
 - MOTION: Mayor Ridgeway moved to approve the Administrative Policy Manual Changes as presented and Ben Marks seconded the motion. All were in favor and the motion carried.

- American Job Center (AJC) Certifications: AJCs must be certified every three years and are due to be recertified. The OSO made any necessary updates to the certification applications for each AJC. The applications were reviewed by a certification committee of partner programs, who also conducted an on-site review, including speaking with staff when needed. Each committee member completed a checklist and then participated in the development of the master checklist included in the handouts. Recommendations are noted on the checklist for each AJC and are basically the same for each. ADA surveys were conducted by Vocational Rehabilitation with only a recommendation for Dresden to add signage. The committee recommends certifying the centers with these recommendations for improvement.
 - MOTION: Mayor Ridgeway moved to approve the certification of the Carroll, Dyer, and Weakley County
 American Job Centers as presented and Ben Marks seconded the motion. All were in favor and the
 motion carried.
- Other: Ted Piazza mentioned that during the other committee meetings there was discussion on how to incorporate more strategy and discussion into meetings. Since we have become so efficient with our meetings, there is an opportunity to discuss how to drive our local agenda and think creatively on how to expand the services to our area. The group discussed ways to do this, including the possibility of an in-person only strategy meeting, at least annually. Jennifer noted that the State Board does have a brainstorming strategy meeting once a year. Ted encouraged the group to reach out to him or Jennifer with other suggestions.

<u>Future Meeting Dates & Upcoming Events</u>: Jennifer reviewed the upcoming meeting dates and events listed on the agenda.

Respectfully submitted,

Lana Burchfiel, Public Information Specialist

Northwest TN Workforce Board Executive Committee Meeting

January 25, 2023 – 10:00 a.m.

Administrative Office 208 N. Mill Ave., Ste. B Dyersburg, TN 38024

Join Zoom Meeting Meeting ID: 841 0884 4472 Passcode: 030815

Agenda

Welcome and Call to Order

Ted Piazza, Chair

Review and Approval of Minutes of 10/26/22 Meeting (Vote Required)

Facilities and Technology Updates

Jennifer Bane

Performance & Program Oversight

Laura Speer

- Quarterly Complaint Logs Update
- Monitoring Status Report
 - o CSP 6-Month Monitoring Update
- PAR & Data Validation Update
- Local Performance Estimated PY 22 Q2 Results

Budget & Administration Update

Financial Status Report & Budget Update

Gina Johnson

One-Stop Operator Procurement Process Update

Jennifer Bane

Other Business Jennifer Bane

- Administrative Policy Manual Changes (Vote Required)
- American Job Center Certifications (Vote Required)

Future Meeting Dates & Upcoming Events

Meeting / Event	Date and Time	Location
West Tennessee Regional Planning Council Meeting	February 22 nd , 11:00 am	Zoom
Next Northwest Tennessee Workforce Board Meeting	February 28 th , 10:00 am (note new time)	Milan Chamber of Commerce & Zoom (1069 S. Main St.)
Virtually Speaking Webinar: Building Your Workforce Through Partnerships in Work-Based Learning	March 2 nd , 9:00 am	Zoom
Southeastern Employment & Training Association	March 12 th , 11:00 am –	The Peabody
(SETA) 2023 Spring Conference	March 15 th , 11:00 am	149 Union Ave, Memphis
State Board Meeting	March 24 th , 8:30 am – 12:00 pm	Nashville / YouTube
Future 2023 Committee Meetings	April 26 th , July 26 th , and October 25 th , 10:00 am	TBD / Zoom
Future 2023 Board Meetings	May 23 rd , August 22 nd , (annual / joint meeting with SW), November 28 th	TBD / Zoom
Future Virtually Speaking Webinars	June 1 st , September 7 th , and December 7 th , 9 am	Zoom

Northwest TN Workforce Board Executive Committee Meeting October 26, 2022 – 10:00 a.m. Zoom / Administrative Office, 208 N. Mill, Dyersburg, TN

Minutes

Committee Members Attending: Ted Piazza, Jimmy Williamson; **via Zoom**: Ben Marks, Rita Alexander, Mayor John Penn Ridgeway, Brad Hurley

Staff Members Attending in person: Jennifer Bane, Gina Johnson, LeAnn Lundberg, Laura Speer; **via Zoom:** Ginger Powell, Lana Burchfiel, Kena Hamm

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

Review and Approval of Minutes: Minutes for the 7-27-22 Executive Meeting were reviewed.

• MOTION: Mayor Ridgeway moved to approve the 7-27-22 Executive Committee minutes as presented and Brad Hurley seconded the motion. All were in favor and the motion carried.

<u>Facilities and Technology Update</u>: LeAnn Lundberg stated that remote access is being installed on staff and resource computers in order to decrease travel time and allow LeAnn to respond more quickly to computer issues. The resource computers will be able to be accessed without permission needing to be granted for access.

<u>Performance & Program Oversight:</u> Laura Speer presented the following reports:

- Quarterly Complaint Logs: No complaints have been received.
- Monitoring Status Report: No issues to report. The full report is attached.
 - OSO 6-Month Monitoring Report: A draft report was presented. There are no major concerns but Jennifer Bane noted that continued outreach is needed as AJC traffic continues to be low. Several KPI goals were not met for the quarter based on estimated results, and the MCPR was below the required 40% at 32.6%. This is not uncommon for the first quarter as most fall expenses aren't seen until the second quarter.
- <u>Local Performance Results</u>: Final program year (PY) 21 results included in the attached handouts were reviewed for the state and the West TN region. All measures were met except median wages for Dislocated Workers. Targets and results will be adjusted after the first of the year based on the characteristics of the participants served.
 - New PY 22&23 Goals: Laura presented the attached negotiated targets for PY 22 and PY 23 and the
 estimated PY 22 Q1 results. All measures are estimated to be met above the 90% required for passing.

Budget & Administration Update:

- <u>Financial Status Report</u>: Gina Johnson presented the attached Financial Status Report as of September 30, 2022. Our Adult funds are 88% obligated, Dislocated Worker 75% obligated, and Youth funds 81% obligated. We expended /obligated 82.18% of our formula program funds with 40.97% expended on participants. We expended / obligated nearly \$2.9 million of the nearly \$3.7 million awarded. We have met and exceeded the requirements for 20% youth work experience expenditures at 55.5% and have a participant cost rate of 32.62%, below the 40% minimum due to fall training expenses typically being recognized in the second quarter.
- PY 22 Budget Update: Jennifer Bane reviewed the attached budget update through 9/30/22. We expended 14% of our formula participant budget, 25% of our operating budget, 29% of our administrative budget, and 20% of our RESEA budget. RESEA funding was significantly increased last year and some funds will be returned. The budget is significantly less for this year.
- One-Stop Operator Proposed Procurement Process & Timeline: Jennifer reviewed the attached proposed OSO procurement timeline since it is time for re-procurement. The proposed process / timeline includes procuring a third-party procurer for a shared RFP with SW, if approved by SW since they are not yet due for renewal. The RFP would have two components, one for NW and one for SW, with bidders being allowed to bid on one or both. Due to deceasing budgets, there may be less funding available for the NW OSO contract.

Other: Jennifer Bane provided the following reports:

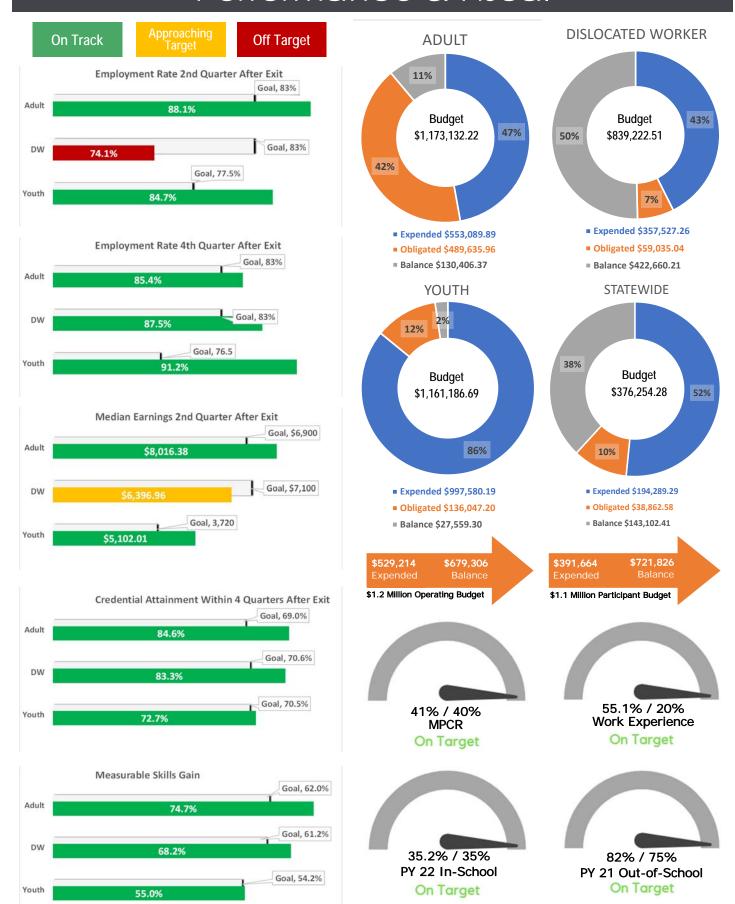
- State Workforce Board (SWB) Updates—KPI Goals & Policy Changes: The negotiated KPI targets are included in the handouts. Jennifer is concerned about meeting the youth goal due to very limited youth money. The In-School Youth goal is new, the SNAP goal has changed, and apprenticeship completions is a pilot. KPIs did not change that much. The SWB's policies to be reviewed at the November 4th meeting were also included in the handouts, along with comments submitted by Jennifer during the public comment period. Board agreements may have to be updated, but the major concerns surround sanctions / incentives related to KPIs, and the 6-month notice requirement for closures or relocations of AJCs.
- <u>2023 Committee Meetings Dates/Format:</u> The committee discussed the proposed dates for 2023 and elected to continue with a hybrid format.
- <u>2023 Board Meeting Dates:</u> The committee discussed the proposed dates for 2023 and a change in the meeting time. Jennifer suggested moving to a morning meeting since WIOA funding cannot be used for lunch and it is difficult to arrange a lunch speaker and the group agreed. A proposed annual joint meeting with SW is included for August.

<u>Future Meeting Dates & Upcoming Events</u>: Jennifer reviewed the upcoming meeting dates and events listed on the agenda. She also mentioned the Red, White and You Veterans Hiring Event scheduled for November 10th. An event will be held that day in each of the local areas in West TN.

Respectfully submitted, Lana Burchfiel Public Information Specialist

	Northwes	t TN Workforce Board MONI	TORING STATUS REPORT		
Subcontractor	Purpose of Subcontract	Scheduled	Date of Review (s)	Corrective Action Needed	Letter Mailed:
2210-2306-OJT-45-5067121 Twin Oaks Technology, LLC	On-the-Job Training: 10- 31-22 to 06-01-23	Scheduled: 11-17-22	Phone Interview: 11-17-22 Fiscal:	N/A	Letter Mailed:
2210-2310-OJT-75-3130734 Allegion/Republic Doors and Frames, LLC	On-the-Job Training: 10- 10-22 to 10-01-23	Scheduled: 11-02-2022	Phone Interview: 11-02-22 Fiscal:	N/A	Letter Mailed:
2209-2309-OJT-26-3132856 B.A.M. 2, Inc.	On-the-Job Training: 09- 15-22 to 09-15-23	Scheduled: 10-11-2022	Phone Interview: 10-11-22 Fiscal: 12-06-22	N/A	Letter Mailed: 12-07-22
2206-2306-OJT-2478166 Thor Boats, LLC	On-the-Job Training: 06-29-22 to 06-21-23	Scheduled: 09-21-2022	Phone Interview: 09-21-22 Fiscal: 12-05-22	N/A	Letter Mailed: 12-05-22
2206-2306-OJT-47-3701669 Auston Mealer's Restaurant Equipment	On-the-Job Training: 06-04-22 to 06-04-23	Scheduled: 09-01-2022	Phone Interview: 09-01-2022 Fiscal: 11-30-22	N/A	Letter Mailed: 12-01-22
2206-2306-OJT-26-1318112 Dana Sealing Products, LLC	On-the-Job Training: 06- 01-22 to 06-01-23	Scheduled: 10-31-2022	Phone Interview: 10-31-22 Fiscal:	N/A	Letter Mailed:
		RFP CONTRACTACT	'S THROUGH		
2206-2306-CSP-62-0800930-MULTI Dyersburg State Community College	Career and Business Services	Dates: 06-27-22 to 06-30-23		Invoices Checked Monthly per Executive Director	
1909-2009-OSO-62-0923487-SHARE Mid-Cumberland Human Resource Agency	One-Stop Operator Services:	Expires: 06-30-23		Invoices Checked Monthly per Executive Director	
		IWT's			

Performance & Fiscal



Work Plan

Scope of Work

Upon being selected to manage the procurement, TPMA will schedule and facilitate a project launch call with the executive leadership of the Northwest Tennessee Workforce Board (NWTNWB) to discuss the roles and responsibilities of the ideal to identify a One-Stop Operator Provider (OSO) for the rural nine (9) county Northwest TN Workforce Development Area and the eight (8) county Southwest TN Workforce Development Area as envisioned by the Board. Additionally, TPMA will request all relevant materials, including local procurement policy, conflict of interest policy, state procurement policy, and previous Request for Proposals (RFPs).

Following the launch call, TPMA will use the board's most recent RFP as the foundation for RFP development, incorporating information gathered from the call. The RFP, branded with the TPMA logo and contact information, will provide detailed information regarding the role and responsibilities of the provider(s), key dates, budget, and TPMA's role in the procurement process. Once the RFP has been drafted then approved by NWTNWB, TPMA will prepare the RFP for dissemination. TPMA will solicit responses by posting legal advertisements in local news publications identified by the Board. These ads will include a link to TPMA's Procurement Webpage, directing interested parties to information about the procurement process, such as the RFPs, contact information, questions and answers, procurement schedule, and any amendments that are applied. We will request the Board's bidders list to distribute the RFPs to interested bidders along with posting the RFPs on the Tennessee Department of Labor and Workforce Development website, if allowable, TPMA's monthly newsletter, social media accounts of TPMA and NWTNWB, and applicable national outlets such as National Association of Workforce Boards (NAWB) and National Association of Workforce Development Professionals (NAWDP).

TPMA is committed to ensuring an open and fair procurement process and as such, will provide interested parties the opportunity to submit questions for clarification two weeks after the RFPs have been released. These questions will be submitted electronically to the procurement team, addressed by the procurement team, then posted to the TPMA Procurement Webpage for public view. The proposal submission deadline, 30 days after the RFPs' release, will be strictly enforced by the procurement team. Once all submissions are made, TPMA will carefully evaluate the proposal package to ensure it meets all criteria outlined in the RFP. An evaluation scoresheet, developed by TPMA, will be used to score each proposal on content as well as format, completeness, assurances, and signatures. The procurement team will review and score each proposal individually, then collectively. If necessary, TPMA will invite bidders to a telephone interview to clarify any questions relating to their proposal. After deliberating, the TPMA procurement team will draft a final recommendation to the NWTNWB based on the results of the evaluation while detailing the procurement process.

Timeline

All materials related to the procurement will be digitally provided to NWTNWB for recordkeeping at the completion of this project. TPMA will provide a written recommendation to the Board's Executive Committee on March or April 2023. Below is the tentative timeline (based on contract award date).

Action	Date
Launch Call	Week of 01/16/2023
RFP and procurement page development	1/16/2023 – 2/10/2023
Present draft RFPs to NWTNWB for review	Week of 02/13/2023
Finalize and release RFPs	Week of 02/20/2023
Develop evaluation scoresheet	Week of 02/20/2023
Deadline for questions	02/27/2023
Post responses to questions on procurement page	03/06/2023
Proposal submission deadline	03/20/2023
Evaluation of bids	03/20/2023 - 04/03/2023
Interviews (if necessary)	Week of 04/10/2023
Draft recommendation report	Week of 04/17/2023
Present recommendation report to evaluation committee	By 04/24/2023
Provide NWTNWB with all digital copy of records	By 05/01/2023

Budget

TPMA has budgeted \$9,999.99 to complete the procurement of a One-Stop Operator Provider (OSO) for the rural nine (9) county Northwest TN Workforce Development Area and the eight (8) county Southwest TN Workforce Development Area. This cost is inclusive of staff salaries, fringe benefits, supplies, technology, advertisement fees, etc.

ltem	Cost
Administrative Costs	\$500.00
Project Launch	\$750.00
Development of RFPs	\$4,200.00
RFP Release	\$250.00
Evaluation of Bids & Final Recommendation	\$4,299.99
Total	\$9,999.99

	ADMINISTRATIVE POLICIES			
Policy Name	Changes to NW	Effective Date NW	Changes to SW	Effective Date SW
Minimum Participant Cost Rate	 Added "and all subsequent updates" in reference to TDLWD Policy 17-11 Revised language from 5-12-17 policy to 11-8-19 policy. Changed reference to original "base" year to "each program year" Added link for related TDLWD policy: Minimum Participant Cost Rate (11-8- 19) 	2-28-23	Policies are basically the same. SW restated TDLWD 17-11 policy versus NW reference policy as attachment/link which TDLWD has updated.	3-9-23
Monitoring	 Added under FISCAL that reports are presented to the full board by the Executive Committee (as stated in other sections of the policy) Updated language regarding of required monitoring submissions. Added link for related TDLWD Policies: Monitoring (11-13-20) LWDB Monitoring Activities (3-20-18) Data Validation (11-13-20) 2022-2023 WIOA Monitoring Guidance (10-1-22) 	2-28-23	Policy does not include distribution of reports to LWDB, data validation, and specifics regarding sample size.	3-9-23
Property Management (umbrella)	 General: Added policy is "in accordance with the Workforce Innovations, Inc. (fiscal agent) Financial Management Manual approved by the Board of Directors" Updated relative definition per TDLWD Local Governance Policy. Added links for related TDLWD policies:	2-28-23	No General Board policy. Provisions addressed in Southwest Human Resource Agency fiscal policy as the fiscal agent. All pertinent information will be covered under NW umbrella Property Management Policy	3-9-23
	Procurement: Added "approval of the LWDB" in the competitive contract award process.		No Board policy. Addressed in SWHRA policy as fiscal agent.	
	Contract Administration Systems:		No Board policy. Addressed in SWHRA policy as fiscal agent	

	Conflict of Interest – Code of Conduct: Added provision from SW regarding expectations of with dealing with the public and compliance with the laws. Property Inventory Systems: 1. Added provision from SW regarding monthly subscription fees that exceed \$5000 annually require prior approval of TDLWD. 2. Revised language for items tagged as part of a computer system.		No separate policy necessary - rescind Relatives of Agency Staff policy. Provisions covered under NW umbrella Property Management Policy No separate policy necessary- rescind Property Guidelines policy. Provisions covered under NW umbrella Property Management Policy.	
Information Access	Updated family definition to reflect TDLWD's updated Local Governance policy. Removed reference to public service announcements.	2-28-23	Replace SW Information Access policy with NW policy. SW does not include requirement and detail regarding updated LWDB roster. Remainder of policy basically the same as original NW.	3-9-23
Allowable & Disallowable Costs	No policy necessary. Cost determination is addressed extensively in the Fiscal Agent Financial Management Manual approved by the LWDB Board of Directors.	n/a	SW Policy to be rescinded as it is not necessary to have a separate policy from the Fiscal Agent Financial Management Manual approved by the Board of Directors.	3-9-23
Board Member Nomination Process	No policy necessary. Nomination process is addressed in LWDB By-laws.	n/a	SW Policy to be rescinded as it is not necessary to have a separate policy from the LWDB By-laws.	3-9-23
Sanctions Policy	No policy necessary. NW addresses corrective action/sanctions in Monitoring Policy and contract language.	n/a	SW Sanctions Policy to be rescinded as it is not necessary to have a separate policy for actions covered in Monitoring policy and contract language.	3-9-23
One Stop Certification	No policy necessary. Will follow TDLWD policy.	n/a	SW policy to be rescinded as it is not necessary. The SW policy was effective 6-19-18 with reference to 10-18-16 TDLWD policy. Current TDLWD policy was effective 7-1-18, revised 2-4-20. NW is not aware of the requirement for a local policy unless the LWDB establishes additional certification criteria beyond the State Workforce Board criteria. Additional criteria are not identifiable in the local policy.	3-9-23
Limited English Proficiency Policy	No policy necessary. Will follow guidelines established in the MOU.	n/a	SW policy to be rescinded as it is not necessary. Will follow guidelines established in the MOU.	3-9-23

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Minimum Participant Cost Rate

Effective Date: May 22, 2018 February 28, 2023

Duration: Indefinite

Purpose: To establish a policy to ensure a minimum of 40% of WIOA Title I formula allocation are expended on allowable participant costs by the end of the Base each program year 2017 (June 2018).

Policy: In accordance with Workforce Services Policy – Minimum Participant Cost Rate (MPCR) TN-WIOA (17-11) issued effective May 12, 2017 through June 30, 2018, the LWDBA 12 adopts this State Policy and all subsequent updates as its local performance accountability measure (WIOA, Section 116(b)(2)(B)). (Attached) Link below.

Further, in accordance with MPCR TN WIOA 17-11, the Local Workforce Development Board for LWDA 12 shall ensure a minimum of 40% of WIOA Title I formula allocations is expended on allowable participant costs by the end of the Base Program year 2017 (June 2018). the LWDB ensures a minimum of 40 percent of their WIOA Title I formula allocations will be expended on allowable participant costs under WIOA funded services. 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.

TN-WIOA (17-11) Attached

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

Related TDLWD Policy: Minimum Participant Cost Rate (MPCR) TN-WIOA 17-11 (Attached) Link below.

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

Vetted and Approved by the Northwest Tennessee Local Workforce Development Board: May 22, 2018- February 28, 2023

Margaret Prater, Executive Director Jimmy Williamson, Chair Northwest Tennessee Workforce Board

Monitoring and Oversight

Effective Date: February 23, 2021 February 28, 2023

Duration: Indefinite

Purpose: To establish a policy for the conduct of monitoring of sub-recipients and the engagement of the local board in monitoring and oversight activities

Policy: Monitoring is a joint responsibility of the Fiscal Agent/Staff to the Board, Workforce Innovations, Inc. (WFI), for the Local Workforce Development Board (LWDB). Compliance staff and each of the administrative-level staff who are responsible for performing desktop review and monitoring of their respective area and reporting deficiencies to the appropriate Director. Fiscal and Compliance staff monitor all fiscal aspects of the programs. The Northwest Tennessee Workforce Board (NWTNWB) LWDB staff and Tennessee Department of Labor and Workforce Development (TDLWD) staff, or their agents, monitor subcontractors and in-house operations. The State Comptroller's Office may also conduct an audit.

The Northwest Tennessee Local Workforce Development Board will conduct monitoring and oversight of its' contractors and sub-recipients in receipt of WIOA funds. A pre-award financial review and / or onsite post-award monitoring of recipients that have little or no workforce program experience will be conducted no later than one hundred twenty (120) days after the award of a contract. All activities conducted and records maintained will be subject to monitoring and evaluation, including from both a fiscal, including procurement, and programmatic aspect. The NWTNWB LWDB Director of Performance and Compliance shall be responsible for overseeing the monitoring of each program activity and for ensuring corrective actions are taken when problems are found.

Programmatic, fiscal, and procurement monitoring may be completed through desktop review, on-site review, including reviews of policies, plans, and procedures governing all segments of program activities and program operations at least once during the program year, or a combination of the two processes. The review may include examining program records, questioning employees, interviewing participants, policy reviews, and entering any site or premise which receives WIOA funds. Participant files may be reviewed through random sampling. Monitoring will also determine compliance with the general procurement standards outlined in 2 CFR 200.318: "The non-Federal entity must use its own documented procurement procedures which reflect applicable State and local laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this section." The monitoring review is designed to help reduce possible audit exceptions, sanctions and unallowable costs. Monitoring at the Northwest TN Local Workforce Development Board, State, and Federal level will include a sample review of the Service Provider(s) and One-Stop Operator monitoring, oversight and quality control of participant training and corresponding employer payroll records, as well, as a sample review of how work-based activities align with and are facilitating the progress of career pathway strategies outlined in the local plan.

Monitoring and Oversight Functions by Staff

Compliance Coordinator - Responsible for developing and maintaining a schedule that will ensure one or more monitoring reviews per year of all aspects of the WIOA program. Write systematic procedures for monitoring of all service components for compliance with WIOA regulations and policies. Monitor all adult, dislocated worker, and youth training activities to assure compliance with local, state, and federal WIOA guidelines. Perform a fiscal review of source documents of contractors and/or vendors to assure compliance. Produce written report(s) of all monitoring findings on contractor and/or vendors to the Director of Performance and Compliance, Executive Director and Contractor and the NWTNWB LWDB.

Work with appropriate staff/contractors to remedy any findings. Conduct follow-up visit to affirm corrective action is taken in a timely manner. Monitor participant eligibility information and training documents. Performance related issues including monitoring for proper documentation, appropriate dates, allowable activities, etc. Serve as a contact for state monitors and auditors during their monitoring activities in NWTNWB of the LWDB. Provide input to, and participate in, the review/evaluation process for Requests for Proposal process.

Fiscal Staff – Responsible for desktop review of subcontracts, invoices, support service contracts and reimbursements on a monthly basis, as well as grant budget and expenditure rates.

Director of Performance and Compliance - Provide policy and direction to Career Service Provider, Business Services staff, Compliance Coordinators, and subcontractors regarding eligibility and record keeping. Responsible for reviewing program objectives and preparing participant status reports on a monthly basis.

EO Officer - Responsible for on-site review of facilities to assure compliance with state and federal regulations.

Monitoring and Oversight by Function

PROCUREMENT – Procurement of goods and services are monitored on an ongoing basis by the Northwest Tennessee Local Workforce Development Board Staff. Staff prepare requisitions for purchase and secure approval of the Director of Finance & Administrative Services and/or Executive Director or his/her designee. The Financial Coordinator Assistant Director of Finance reviews purchases prior to approval by the Director of Finance.

FISCAL – Budgets and expenditures of all grants are monitored on a monthly basis by the Director of Finance and reported to the Executive Director and reported quarterly to the Northwest Tennessee Local Workforce Development Board Executive Committee who then presents to the full board, including the local elected officials as ex-officio members. Monthly reports are prepared based on the organization's accounting system and approved by the Executive Director prior to submission to the TDLWD. A review of expenditure and budget levels is made on a periodic basis dependent upon the particular grant.

Every subcontract must be fiscally monitored during the contract period. The Compliance Coordinator will keep a file for each individual contract and keep the monitoring report updated. The fiscal monitoring process is as follows:

- One Stop Operator and Career Service Providers contract invoices are reviewed monthly.
- For On-the-Job Training and Incumbent Worker Training Contracts, if the contract allows for contractors to bill at the end of the participant's training, the invoice is monitored once received for payment. A minimum of one invoice must be monitored per contract.
- Back-up documentation supporting the invoice must be included. Back-up documentation is defined as supporting documents for amounts on the invoice.

PROGRAM OBJECTIVES – Program Objectives are monitored on a monthly basis. The Executive Director, and / or his / her designee, and Director of Performance and Compliance review internal reports submitted by the Career Service Provider and One Stop Operator Staff and/or contractor and prepares summary reports to be reviewed by the Local Northwest Tennessee Workforce Development Board.

GRIEVANCE PROCEDURES – Monitoring includes a review of a sample of participant files to assure that the participant has acknowledged receipt of a registrant handbook and grievance procedures.

RECORD KEEPING – All contracts, participant and fiscal records are to be maintained for a minimum of five years, unless subject to audit which are kept until the audit is concluded.

EQUAL EMPLOYMENT OPPORTUNITY – On-site visits to subcontractors and in-house operations include an interview with participants regarding their knowledge of Equal Employment Opportunity and a viewing of appropriate equal opportunity posters.

AMERICANS WITH DISABILITIES ACT – On-site visits to subcontractors and in-house operations include discussions with subcontractors and a review of the property.

On-Site Program Evaluation

The purpose of the on-site evaluation process is for the Compliance Coordinator to observe each program, to see how the program is being implemented, meet and interview some of the participants to assess their satisfaction/success with the program and to observe that funds are being spent according to the contract. There are specific monitoring questions to be utilized during the on-site review according to the program. The current contracts that require on-site evaluation (subject to change) are On-the-Job Training contracts and may include the One Stop Operator and Career Service Provider. Site reviews may be conducted virtually as needed.

One-Stop Operator Monitoring & Oversight

The Local Northwest TN Workforce Development Board will monitor the activities of the One-Stop Operator at least once annually during the contract period, no less than sixty (60) days prior to the expiration date of the contract. The monitoring process will determine compliance with the contractual agreement, federal, state and NWTNWB LWDB policies.

Additionally, all invoices will be monitored prior to payment, including review of source documents supporting payments. In the event of inappropriate or undocumented requests for reimbursement, the Authorized Signatory Authority will be notified and given an opportunity to provide additional documentation and/or explanation. The Director of Performance and Compliance will consult with the Director of Finance & Administrative Services regarding any final adjustments to the invoice.

Upon completion of a monitoring, the Performance and Compliance staff will develop a formal, written, monitoring report, detailing the results of the monitoring, including any necessary corrective action. The report is forwarded to the Executive Director for review prior to issuing the final report to the One-Stop Operator Signatory Authority. The final report will be issued within thirty (30) days of the completion of the review. Continued monitoring will occur if the Correction Action Plan is deemed inadequate. Results of the monitoring will be reported to the Executive Committee of the NWTNWB LWDB, who will then report results to the full NWTNWB LWDB, which includes the Consortium of Local Elected Officials as ex-officio members.

Service Provider(s) Monitoring & Oversight

The Northwest TN Local Workforce Development Board will monitor the activities of the Service Provider(s) at least once annually during the contract period, no less than sixty (60) days prior to the expiration date of the contract. The monitoring process will determine compliance with contractual agreements, federal, state and NWTNWB LWDB policies.

In addition, a minimum of a 20% sample of the newly enrolled participants will be monitored on an ongoing basis for eligibility and other compliance factors, including but not limited to, providing appropriate service strategies, proper documentation, accurate recording of data, and timely case notes. The NWTNWB LWDB will utilize the TDLWD Program Accountability Review form, Data Validation guidelines, policies of the Board, policies of the TN Department of Labor and Workforce Development, the WIOA, federal regulations and guidance, and other relevant information as the basis of the review of the following areas:

- Date of WIOA Application in Jobs4TN
- Eligibility Date in Jobs4TN
- Contact Information (Social Security Number, Address, Phone Numbers)
- Demographic Information (DOB, Gender, US Citizenship, Selective Service if applicable, Race, Disability)
- Veteran Information
- Employment Information
- Education Information
- Public Assistance Information
- Barriers
- Household and Income
- Federal Initiatives
- Eligibility Summary
- Eligibility correctly entered in Jobs4TN
 with supporting documentation in the
 electronic file verifying how they were
 made eligible. The income table for
 Adult/DW/Youth should be attached to
 support the time-period of eligibility if
 making eligible based on income.
- If the participant was made eligible as a youth (family of one) based on a disability, supporting documentation showing proof of the disability must be in the file.
- Data has been keyed and documents uploaded to VOS within 10 days.

- Assessment used and uploaded to documents in VOS
- Objective Assessment keyed for Youth Dates should match activities keyed in VOS
- Individual Employment Plan/Service Strategy (goals to be in line with the participants plan) – Dates should match activities keyed in VOS
- Appropriate Activities keyed in VOS with documentation to back up dates: for Youth – 14 Elements reflected accordingly
- Case Notes are required monthly and should be detail oriented and clearly explain what is actively occurring with the participant. It is crucial that staff is obtaining direct contact with the participant or school/institution to determine their current progress in school.
- EO statement/Grievance complaint procedure.
- Proof of other grant coordination in the file (SAR showing they are getting pell, lottery, etc. The EAS form can be used to show proof of the SAR).
- Review all ITAs and travel authorizations with back up documentation.

Identification of significant compliance issues may result in expansion of the sample. A sample of participant files identified to close/exit will be reviewed for compliance with closure/exit data and documentation. Further, all invoices will be monitored prior to payment, including review of source documents supporting payments. In the event of inappropriate or undocumented requests for reimbursement, the Authorized Signatory Authority will be notified and given an opportunity to provide

additional documentation/explanation. The Director of Performance and Compliance will consult with the Director of Finance & Administrative Services regarding any final adjustments to the invoice.

Upon completion of a monitoring, the Performance and Compliance staff will develop a formal, written, monitoring report, detailing the results of the monitoring, including any necessary corrective action. The report is forwarded to the Executive Director for review prior to issuing the final report to the Service Provider Signatory Authority. The final report will be issued within thirty (30) days of the completion of the review. Continued monitoring will occur if the Correction Action Plan is deemed inadequate. Results of the monitoring will be reported to the Executive Committee of the NWTNWB, LWDB, who will then report results to the full NWTNWB LWDB, which includes the Consortium of Local Elected Officials as ex-officio members.

Data Validation

In accordance with TDLWD policy, each local workforce development board (LWDB) will also be responsible to conduct quarterly data validation review of each program for which they are a sub-recipient of program funds. The results of the data validation must be submitted quarterly to the State Workforce Development Board (SWDB) along with the LWDB's quarterly other monitoring report(s) as requested. The LWDB must conduct the number of data validation reviews based on the sample size established by the TDLWD Workforce Services (WFS) staff. Notification of sample size will be sent to the LWDBs through a 'Notice of Data Validation.' During the validation process, any files that contain data errors will be expected to be corrected within 30 business days after the submission of the quarterly monitoring report.

Service Provider Monitoring (as Contracting Authority)

It is the responsibility of the Service Provider to monitor (fiscal/programmatic and desktop/onsite) their subcontracts at least annually, as well as a sample of participant files. The Service Provider will submit a plan/schedule of monitoring to Workforce Innovations, Inc. the Fiscal Agent/Staff for the LWDBs Northwest TN Workforce Board. A copy of any completed monitoring reports will be due by the 10th of the month for the previous month.

The Service Provider is also responsible for monitoring a sample of all other participants (non-work-based training) for eligibility, service strategy, expenditures and data validation elements.

One-Stop Operator Oversight

It is the responsibility of the One-Stop Operator to provide quality control checks on services provided through the American Job Center on behalf of participants and employers. This may include a review of new enrollments to determine that appropriate services were provided and review of potential exits to determine if additional services are required. Additionally, the One-Stop Operator will conduct surveys with individual and employer customers of the American Job Center.

Other Subcontractor(s) Monitoring

It is the responsibility of the Director of Performance & Compliance to monitor (fiscal/programmatic and desktop/onsite) other subcontracts at least annually. Contracts for Work-Based Training must be monitored at least once by the contracting authority. 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.

Monitoring must also include regular review of 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. A sample of participant files engaged in work-based training should be monitored for eligibility, service strategy, expenditures, and data validation elements.

Additional Monitoring

The NWTNWB LWDB Board and its staff reserve the right to conduct additional monitoring outside the established procedures in this policy. Additional monitoring will only take place when there is reason to suspect that there are non-compliant practices occurring by the subcontractor. If additional monitoring is conducted, the subcontractor will be notified in writing to identify the reason and timeline to be established.

Monitoring Reports & Resolution Process

Written monitoring reports are comprised of five basic areas:

- 1. Scope of Contract
- 2. Timeliness of Invoice Submission
- 3. Adequacy of Documentation
- 4. Proper Completion of Invoice
- Compliance within Budget Limits

A finding in a monitoring report is any specific violation of program authorization/statue, other applicable Federal, State, or local statutes, policies, or procedures, applicable appropriations, implementing regulations, Executive Orders, OMB Circulars (including 2 CFR part 200 & 2 CFR part 2900), DOL-ETA Directives, or terms and conditions of the award. Findings always require action to 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.

NWTNWB 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 quarterly 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.

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)

<u>WFSGuidanceLocalWorkforceDevelopmentBoardMonitoringActivities.pdf (tn.gov)</u> (effective 3-20-18)

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

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

Vetted and Approved by the Northwest Local Tennessee Workforce Development Board: February 23, 2021 February 28, 2023

Jimmy Williamson, Chair Northwest Tennessee Workforce Board

Property Management

Effective Date: May 22, 2018 February 28, 2023

Duration: Indefinite

Purpose: To establish a Property Management Policy.

Policy: The Northwest TN Local Workforce Development Board (LWDB) has established Property Management policies for Procurement, Contract Administration, Conflict of Interest – Code of Conduct, and Property Inventory Systems in accordance with the Workforce Innovations, Inc. (fiscal agent) Financial Management Manual approved by the Board of Directors as follows:

Procurement

The Northwest Tennessee Workforce Board (NWTNWB), the fiscal agent for Local Workforce Development Area (LWDA) 12 follows the below guidelines to procure goods and/or services:

- (1) <u>Small Dollar Purchases</u> Non-recurring purchases totaling less than \$10,000, cumulatively in expense or revenue, may be made without documenting any quotes or proposals from multiple vendors.
- (2) <u>Informal Solicitations</u> Purchases totaling less than \$50,000 in expense or revenue may be made 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). For competitive procurement of goods, an ITB/RFQ is appropriate, and in general, a purchase order may be used to finalize the purchase. 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) 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 Executive Director and additional documentation may also be required as a part of the request.

- (5) <u>Federal and State Guidelines</u> All procurement policies follow Federal and State guidelines and fiscal staff are trained on allowable and unallowable costs. All purchases are made in accordance with Workforce Services Policy- WIOA (Allowable and Disallowed Costs, Including Food) and Workforce Services Policy- Workforce Services (Property Management)
 - WIOA.

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. 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 Director of Finance & Administrative Services Chief Officer and Executive Director for payment. Once entered into the system for payment, the Director of Finance & Administrative Services Chief Operating Officer 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 Infrastructure Funding 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 IFA needs to be modified. Fiscal staff also attend appropriate trainings, as offered, in order to ensure compliance with the Uniform guidance.

The NWTNWB Local Workforce Development Board (LWDB) staff/fiscal agent may contract with various agencies, in accordance with WIOA Legislation and Tennessee Department of Labor and Workforce Development (TDLWD) policies, in order to select a One-Stop Operator, provider(s) of Title I services, and / or employers for programs such as On-the-Job Training (OJT) Grants, Incumbent Worker Training (IWT) Grants, and "Buy-out" classes. When awarding contracts through a competitive process, such as IWT grants and Title I sub-contracts, the NWTNWB LWDB staff/fiscal agent researches potential bidders, issues a Request for Proposal, receives proposals, reviews, and then awards competitive grants to providers based on identified scoring criteria and approval of the LWDB. Once it is determined that funds can be allocated for OJT/IWT grants or Buy-out classes, the NWTNWB LWDB has authorized administrative staff to initiate agreements or contracts with employers or appropriate community organizations.

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 LWDB, 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, shall issue 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.

Debarred and Suspended Parties

In accordance with WIOA regulations as Final Regulation 20 Section 683.200, LWDAs must not make any award or permit (sub-grants or contracts) to any party debarred, otherwise, suspended, or otherwise excluded from being eligible for participation in Federal assistance programs in accordance with US DOL Regulation at 29 CFR Part 98. Recipients and sub-recipients shall comply with these requirements.

Contract Administration Systems

The Northwest TN Workforce Board Workforce Innovations, Inc., as fiscal agent for the undersigned Local Workforce Development Board, has an opportunity to contract with various entities for services. This includes both competitive and non-competitive awards using standard contracts, leases and purchase orders in accordance with WIOA and related guidance. The Contract Administration System is established to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

All contracts, leases and purchase orders will:

- 1. be procured according to WIOA and related guidance
- 2. be in written form, utilizing standard language that coincides with the funding source grant language.
- 3. be reviewed by at least two individuals prior to approval
- 4. be assigned an identifying number
- 5. be maintained for a period of 5 years (effective July 1, 2017)

Further, all contracts will:

- 1. require timely invoices and progress reports
- 2. be reviewed periodically by contract manager for progress toward contract goals
- 3. be monitored annually for compliance requirements

Conflict of Interest – Code of Conduct

The purpose of this policy is to define and provide guidance to all workforce entities providing WIOA services, what would be considered a conflict of interest and how to conduct business while preventing any actual, potential, or questionable conflict of interest.

Individuals

The WIOA is not an entitlement program. Still, it should be accessible to any individual, in any local area, who is eligible and suitable for available services subject to Local Workforce Development Board (LWDB) policies and procedures. However, when applicants have a close relationship with WIOA staff members, management, and other specific stakeholders of the Workforce Development System, access to program services should not be based on such relationships or based on political influence. It is

possible that, even without any intention of misuse of WIOA funds, that a decision to enroll an individual in the program could be perceived as improper. Such a perception could cause non-compliance with state and / or federal law.

For the purpose of this policy, a conflict of interest "relative" will be considered a parent, step-parent, or parent-in-law, child including step child or adopted child, spouse or partner, brother, including step, half, or foster brother, sister, including step, half or foster sister, grandparent, grandchild, son-in-law, brother-in-law, daughter-in-law, sister-in-law, aunt, uncle, cousin, or other family member who resides in the same household. A "close personal acquaintance" is defined as a personal friend, personal friend's spouse or children, boyfriend / girlfriend and their children, and church or neighbors with whom you have a close relationship.

- If a relative or close personal acquaintance of a staff member is to be enrolled in any WIOA program, the employee will notify his/her supervisor and the Executive Director.
- Staff members will not determine eligibility for a relative or close personal acquaintance for any WIOA program.
- Staff members will not authorize or approve funds for a relative or close personal acquaintance enrolled in any WIOA program.
- Staff members will not serve as Career Advisor for a relative or close personal acquaintance.
- Staff members will not make approval of payments when a relative or close personal acquaintance is involved.
- Staff members will not accept gifts from participants in any WIOA program.

A disclosure statement for both the participant and staff member determining eligibility and providing services has been must be included ion the intake / eligibility paperwork form.

Contractors/Vendors

WIOA includes opportunities to contract with various organization, including non-profits, educational institutions, private employers, vendors, etc. Staff members with the responsibility to select, award and or administer contracts or payments must avoid any potential conflict of interest.

No employee, officer or agent of the NWTNWB LWDB shall participate in any way (including discussion, review and/or voting) in the selection, or in the awarding of, or administration of a contract supported by Federal or State funds if a conflict of interest, real or apparent, would be involved. Such conflicts arise when:

- The employee, officer (for the purpose of this policy, workforce board members shall be considered as officers), or agent,
- Any member of immediate family,
- His or her partner, close personal relationship, or
- An organization which employs, or is about to employ any of the above, has a financial or other interest in the firm selected for the award.
- The NWTNWB LWDB officers, employees, or agents will neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub agreements.

For the purpose of this policy, a conflict of interest "immediate family" will be considered a parent, stepparent, or parent-in-law, child including step child or adopted child, spouse or partner, brother, including step, half, or foster brother, sister, including step, half or foster sister, grandparent, grandchild, son-in-law, brother-in-law, daughter-in-law, sister-in-law, aunt, uncle, cousin, or other family member who resides in the same household <u>and</u> is in an ownership and/or management position with the Contractor/Vendor entity. A "close personal acquaintance" is defined as a personal friend, personal friend's spouse or children, boyfriend / girlfriend and their children, and church or neighbors with whom you have a close relationship <u>and</u> is in an ownership and/or management position with the Contractor/Vendor entity.

Officers, employees or agents of the NWTNWB LWDB will not:

- solicit bids from a potential Contractor/Vendor of immediate family member or close personal acquaintance.
- award a bid to a Contractor/Vendor of an immediate family member or close personal acquaintance.
- serve as contract officer for a Contractor/Vendor of an immediate family member or close personal acquaintance.
- approve payments for a Contractor/Vendor of an immediate family member or close personal acquaintance is involved.
- monitor contracts/payments for a Contractor/Vendor of an immediate family member or close personal acquaintance.

Officers, employees or agents of the NWTNWB LWDB will:

- act in a courteous, friendly, helpful and prompt manner in dealing with the public, customers and officials.
- conduct all business with honesty, fairness, integrity and loyalty, consistently practicing ethical behavior and processes.
- conduct themselves in such a manner as to merit the respect of their employer, co-workers and peers.
- exercise skill and good judgement to obtain the maximum value for each dollar of expenditure.
- treat with discretion all information obtained in confidence.
- strive for standardization to reduce cost and further the development and methods of products that emphasize high quality, safety and effectiveness of services.
- be knowledgeable of and comply with all applicable laws and regulations of the United States, the State of Tennessee, WIOA and other grant resources in a manner that will reflect a high standard of ethics.

Staff members are required to adhere to the Northwest TN Local Workforce Development Board policy, as well as, the TN Department of Labor and Workforce Development Conflict of Interest Policy.

Property Inventory Systems

In accordance with 2 CFR 200.313(d)(1)-(5) the Northwest TN Local Workforce Development Board will, at a minimum, meet the following requirements:

(1) Property records must be maintained that include a description of the property, a serial number or other identification number, the source of funding for the property (including the FAIN), who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.

- (2) A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.
- (3) A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated.
- (4) Adequate maintenance procedures must be developed to keep the property in good condition.
- (5) If the non-Federal entity is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

Types of Property for which Accountability must be Maintained

In accordance with the TDLWD Property Management policy, the types of property for which accountability must be maintained include:

- (1) Tangible personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. Examples include furniture, machinery, office, operational, and educational equipment, etc.
- (2) Sensitive equipment having a unit cost of \$100 to \$5,000. Examples include typewriters, tape recorders, printers, computers, and cameras.
- (3) Personal Computer systems will be tagged as a unit consisting of the CPU, monitor, keyboard, external tape cartridge, and mouse the computer itself. All other equipment The print will be tagged separately.

All NWTNWB-LWDB procurements of sensitive equipment or procurements having a unit acquisition cost of \$5,000 or more must have prior written approval from TDLWD. Monthly subscription fees under \$5,000 are also included should the total annual cost for the subscription exceed \$5,000, in which prior approval must be obtained.

The Governor, on behalf of the U.S. Department of Labor (DOL) reserves the right to claim title to all property purchased with WIOA, WIA, JTPA, or CETA funds with a current per-unit fair market value in excess of \$5,000 (Property Accountability 114S-60.401 Classification Criteria).

Equipment Property Management Procedures

In accordance with the TDLWD Property Management policy:

- (1) When property with a current per-unit value in excess of \$5,000 has been stolen or destroyed by fire (or another disaster), is considered obsolete, or is to be traded for new equipment, the NWTNWB LWDB shall notify the State office of the particular event and request approval to remove the property from the Record Inventory.
- (2) If any property is stolen, the theft must be reported to the police for investigation and a copy of the Police Report must accompany the Report of the Survey. If the stolen property has a current per-unit value of \$5,000 or more the Federal Bureau of Investigation must be notified and a copy of the report must accompany the Report of the Survey.
- (3) If the property is destroyed by fire, a copy of a Fire Marshall's Report must accompany the Report of the Survey.

When the NWTNWB-LWDB determines that the property is non-serviceable due to obsolescence, the destruction of the equipment must be requested through the State's Asset Works system, at which time the State Procurement Office re-evaluates the condition of the equipment. TDLWD will review the request and approve it with instructions to forward it to the NWTNWB LWDB before the State Procurement Office re-evaluates the condition of the equipment. All property records must be maintained for three years after final disposition of the property. For additional information regarding disposition of property, please see Provision 4, Section D of the Supplementary Financial Guide.

- (4) The NWTNWB LWDB must tag all property with the appropriate tag and records must indicate the program under which the property was acquired. Upon request, tags will be provided by the TDLWD. After tagging the equipment, it should be added to the NWTNWB LWDB inventory listing. Inventory records must contain the following information:
 - a. Tag number
 - b. Program funding the acquisition
 - c. Percentage federally funded (if not 100%)
 - d. Date of purchase or acquisition
 - e. Condition of the property (cost or fair market value)
 - f. Location
 - g. Serial number or other identifying number should be added to other pieces of equipment acquired.

New acquisitions must be reported to TDLWD on the Property Record form. All new property should be clearly marked. New property listings must be submitted to TDLWD as soon as possible after tagging the property.

Reference: 2 CFR 200; 2 CFR 200.311-312; 2 CFR 200.313(d)(1)-(d)(5); 2 CFR 200.333(c)-(d)

Related TDLWD Policy: Property Management Policy (2-3)

Allowable and Unallowable Costs (tn.gov)

PropertyManagement.pdf (tn.gov)

WFSPolicyConflictofInterest.pdf (tn.gov)

WorkforceServicesGuidancePurchaseSuppliesorEquipment.pdf (tn.gov)

WFSPolicyOne-StopOperatorandServiceProviderProcurement.pdf (tn.gov)

WFS Guidance-Cost Classification.pdf (tn.gov)

Vetted and Approved by the Northwest Tennessee Local Workforce Development Board: May 22, 2018- February 28, 2023

Information Access

Effective Date: June 10, 2020 February 28, 2023

Duration: Indefinite

Purpose: To establish the roles and responsibilities for making meeting information and minutes

available to the public.

Policy: WIOA Section 107(e), along with 20 CFR 679.390 and 20 CFR 679.550(b)(5), requires that the local boards make available to the public, on a regular basis through electronic means and open meetings, certain information such as minutes of formal Local Board meetings. This information must be made available upon request and on the local area's website. Workforce Services' Local Governance Policy requires that each Local Workforce Development Board (LWDB) have its minutes made available on the LWDB's website within fifteen (15) business days of the LWDB's approval of the meeting minutes. Only the formal minutes must be posted on the website; no attachments of presentations at the board meeting are needed unless the LWDB believes that these attachments are necessary. Meeting handouts for the Northwest TN Local Workforce Development Board meetings will typically be posted in conjunction with the minutes as a means of recordkeeping and access for board members, staff, contractors, partners, and the public.

Along with the board minutes, the LWDB must provide the updated LWDB roster to be uploaded on the LWDB's website. The board roster must be easily accessible, visible to the public, and meeting minutes can be uploaded together and both should be on the website with fifteen (15) business days of the LWDB's approval of the meeting minutes. The roster must include the following information:

- The name of the LWDB,
- The date the member was confirmed to serve on the LWDB,
- The member's first and last name,
- The member's county of representation residence, and
- The organization the member represents.
- The beginning and end dates of the member's conflict of interest statement
- The category the member represents,
- The nominator's first and last name,
- The organization the nominator represents, and
- Whether the member serves on the Executive Committee

Tennessee Code Annotated Section 10-7-503(a)(2)(A)(B) requires that public records are to be open to the public. Transparency and accountability must be a part of the function and duties of the LWDB; business conducted in an open manner and with appropriate accommodations ensures that the public, including people with disabilities, can access information concerning board meetings. The LWDB must ensure that appropriate accommodations—such as documents in Braille and large print, sign language interpreters, wheelchair accessibility, and closed captioning—are made so that those with disabilities have access to all its public meetings and pertinent records.

With the approval of this policy, the Northwest Tennessee Local Workforce Development Board assures compliance with the referenced Workforce Services Division policy, including all federal rules and regulations, by:

- Providing adequate notice to the public about its upcoming meetings including location, date, and time of meetings. Notices will be posted on the Board's website and social media page, sent to area newspapers as a public service announcement, and be emailed to Board Members and Local Elected Officials for distribution thirty (30) days prior to the meeting.
- 2. Conducting its business of those meetings in an open manner.
- Arranging for all individuals, including those with disabilities, to have physical and electronic
 access to LWDB meetings, including appropriate accommodations, auxiliary aids, and services
 such as offering documents in Braille and large print, sign language interpreters, wheelchair
 accessibility, and closed captioning.
- 4. Arranging for the public to have access to the LWDB meeting minutes and any other pertinent information related to LWDB business by making them available to the public upon request, on its website within fifteen (15) business days of the Board's approval of the meeting minutes, and available in alternate formats for people with disabilities as needed.
- 5. Providing notification to the Tennessee Department of Labor and Workforce Development (TDLWD), as instructed by the State Workforce Development Board, immediately after posting minutes to its website

Reference: WIOA Section 107(e); 20 CFR 679.390; 20 CFR 679.550(b)(5); Tennessee Code Annotated Section 10-7-503(a)(2)(A)-(B)

Related TDLWD Policy: Local Governance Policy

Vetted and Approved by the Northwest Tennessee Local Workforce Development Board: June 10, 2020 February 28, 2023

Jimmy Williamson, Chair Northwest Tennessee Workforce Board



One-Stop Certification Checklist					
Date: 1/5/2023	Type of AJC: Compre	ehensive			
American Job Center Address:					
470 Mustang Drive Huntingdon, TN		T			
Contact Name:	Contact Phone:	Contact E			
(Dayton) Benny Roberts	731-352-8815	dayton.ro	berts@tn.	gov	
CRITERIA			MET	NOT MET	N/A
REQUIRED PARTNERS			<u> </u>		
Title I Adult Services			\boxtimes		
Title I Dislocated Worker Services			\boxtimes		
Wagner-Peyser Title III			\boxtimes		
Adult Education			\boxtimes		
Vocational Rehabilitation			\boxtimes		
Title V SCSEP			\boxtimes		
TANF			\boxtimes		
Career and Technical Education Programs (postsecon	ndary) Carl D. Perkins Act		\boxtimes		
Trade Adjustment Assistance			\boxtimes		
Veterans Employment Services			\boxtimes		
Community Services Block Grant			\boxtimes		
Housing & Urban Development Employment & Train	ing				\boxtimes
Unemployment Insurance			\boxtimes		
Services of one or more core partners are available			\boxtimes		
ONE-STOP OPERATIONS			_		
The MOU between the LWDB and required One-Stop	p partners is signed and in plac	ce	\boxtimes		
The MOU reflects the name and location of the AJC apartners will integrate services within the center	and the way in which required	core	\boxtimes		
The center is implementing the MOU specifications			\boxtimes		
The One-Stop Operator (OSO) is competitively select	ted and is in compliance with s	tate and	\boxtimes		
federal guidelines Roles and responsibilities of the OSO are clearly ider	ntified		\boxtimes		
Roles and responsibilities of the Career Services Prov		d			
At least one Title I staff member and one Wagner-Pe	· · · · · · · · · · · · · · · · · · ·				
during operating hours, and have the capacity to pro	•				
The AJC is operating in a cost-efficient manner			\boxtimes		
The AJC actively conducts outreach and provides ser	vices such as participation in		\boxtimes		
workshops, job fairs and recruitment events	, .			_	
Marketing materials provide an overview of all core customers	partner services, and are avail	able to	\boxtimes		
The AJC connects with the community through mult points	iple community partnerships a	nd access	\boxtimes		



The AJC staff view themselves as part of the One-Stop system, and views all customers as shared customers, creating a positive customer experience	\boxtimes		
The AJC strives to increase the percentage of customers placed in economically sustainable	\boxtimes	П	
employment			
The AJC strives to increase the percentage of customers receiving education and training	\boxtimes		
services			
The AJC has procedures in place to meet the WIOA requirements for integrated planning	\boxtimes		
and service delivery			
The AJC has identified ways to support the changing role as TANF as a one-stop partner,	\boxtimes		
including coordination of services and enrollment			
The AJC staff view themselves as part of the One-Stop systems, and view all customers as	\boxtimes		
shared customers, creating a positive customer experience			
FOCUS ON PARTICIPANT SERVICE			
The AJC operates during required business hours	\boxtimes		
The AJC provides flexible operating hours, including evenings and weekends	\boxtimes		
The AJC is established to provide services tailored to the needs of a specific group			\boxtimes
The AJC provides employer meetings tailored to the needs of a specific group being serviced	\boxtimes		
The AJC provides initial assessment of skill level, aptitudes, abilities, and supportive service	\boxtimes		
needs			
The AJC utilizes labor market employment statistics information, relating to local, regional,	\boxtimes		
and national labor market areas, including job vacancy listings, information on job skills			
necessary to obtain the jobs; and information relating to local occupations in demand and			
the earnings, skill requirements, and opportunities for advancement for such occupations			
All AJC staff members can identify regional targeted sector pathways, and understands	\boxtimes		
those terms in implementation of providing services to customers			
The AJC has available, and provides when applicable, education and training opportunities	\boxtimes		
for customers at multiple skill and experience levels			
The AJC has intensive menu of training opportunities, and staff is available to assist	\boxtimes		
customers with enrollment, including career pathways to middle class jobs, education and			
training, work-based learning, OJT, and registered apprenticeships			
The AJC staff are competent and proficient in establishing eligibility for programs, or	\boxtimes		
financial aid assistance for education and training			
The AJC provides ease of access to credentialed education and training	\boxtimes		
The AJC uses LMI to actively promote targeted sector and high-demand occupations to	\boxtimes		
customers, including job search and placement services, and career counseling			
The local plan identifies ways in which core partners will integrate services and referrals	\boxtimes		
among partner programs			
Core partners support integrated intake, case management, and reporting outcomes	\boxtimes		
There is a customer feedback process in place, including regularly addressing issues	\boxtimes		
The AJC provides information and assistance regarding filing claims for unemployment	\boxtimes		
compensation			
FOCUS ON BUSINESS SERVICE			1
The AJC establishes and develops relationships and networks with large and small	\boxtimes		
employers and their intermediaries			



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



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



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

Recommendations:

- Additional partners to co-locate and make the building more cost-effective.
- Customer flow chart for services, referrals, etc.
- Establishing set assessment points at the AJC (Wagner Peyser).
- Tools / resources for access sites and partners for assessments and referrals (checklist).
- Sharing of best practices by frontline staff at Functional Team meetings.
- Case management discussions during Skills Training team meetings.
- Improving documentation of case management in case notes.
- Streamlining communications for referrals and ensuring documentation in Jobs4TN.
- Enhancing staff buy-in to the overall workforce system.
- Short, focused trainings for AJC staff on a regular basis featuring frontline staff as speakers.
 - Recommended Topics: WIOA, LMI resources, targeted sectors and occupations, assistive technology, Jobs4TN, etc.



Vocational Rehabilitation Program

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

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

Date of Survey: January 5, 2023

Survey conducted by: David Parrish, Vocational Rehabilitation Program

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

Following are the survey findings and recommendations.

1.0 Parking

- 1.1 The Huntingdon American Job Center (AJC) is located in a separate building and is a one level structure. There are parking areas in front and behind the building and they reasonably level. There are appropriate curb cuts where needed.
- 1.2 There are four accessible parking spaces and 4 van accessible spaces which are appropriately signed and striped.

Recommendations: None.

2.0 Entrance

- 2.1 The AJC is accessed directly from the parking lot and there is no need of ramps because the building and the parking lot are on the same level. Once inside, the office has an open landscape so that all areas are accessible.
- 2.3 The entry door has a buzzer at an appropriate height and staff will assist as needed.

Recommendations: None

3.0 Reception

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

Recommendations: None

4.0 Public Areas

4.1 All public areas are accessible with no hazards.

Recommendations: None

5.0 Accessible Restrooms

5.1 All restrooms are fully accessible.

Recommendations: None

6.0 Resource Room

- 6.1 The resource room can accommodate individuals with disabilities.
- 6.2 The computer available for individuals with disabilities meets the minimum requirement for wheelchair accessibility.
- 6.3 Staff is available to accommodate the use of computers, printers, faxes and copiers when needed.

Recommendations: None

7.0 Communication

- 7.1 Staff is aware of how to use the phone relay service for the deaf and computers to communicate with the deaf and hard of hearing.
- 7.2 Staff is aware of contacting VR for assistance with obtaining documents in Braille.
- 7.3 Staff is aware of how to contact and schedule a sign language interpreter.

Recommendations: None

8.0 Signage

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

Recommendations: None

10.0 Fire Alarms

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

Recommendations: None

11.0 Emergency Egress Planning

- 11.1 There is a general knowledge of emergency egress planning.
- 11.2 Staff understands that in the event of an emergency that all rooms within the AJC need to be cleared of customers and that individuals with disabilities may require additional assistance to exit the building.

Recommendations: None

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



One-Stop Certification Checklist					
Date: 1/4/2023	Type of AJC: Compre	hensive			
American Job Center Address:					
313 West Cedar Street Dyersburg, TN 38024					
Contact Name:	Contact Phone:	Contact E			
Sam Shamblin	731-501-1109	Samuel.Sh	hamblin@	tn.gov	
CRITERIA			MET	NOT MET	N/A
REQUIRED PARTNERS			1	T	T
Title I Adult Services			\boxtimes		
Title I Dislocated Worker Services			\boxtimes		
Wagner-Peyser Title III			\boxtimes		
Adult Education			\boxtimes		
Vocational Rehabilitation			\boxtimes		
Title V SCSEP			\boxtimes		
TANF			\boxtimes		
Career and Technical Education Programs (postsecon	ndary) Carl D. Perkins Act		\boxtimes		
Trade Adjustment Assistance			\boxtimes		
Veterans Employment Services			\boxtimes		
Community Services Block Grant			\boxtimes		
Housing & Urban Development Employment & Train	ing				\boxtimes
Unemployment Insurance			\boxtimes		
Services of one or more core partners are available			\boxtimes		
ONE-STOP OPERATIONS			1		T
The MOU between the LWDB and required One-Stop	p partners is signed and in plac	e	\boxtimes		
The MOU reflects the name and location of the AJC apartners will integrate services within the center	and the way in which required	core			
The center is implementing the MOU specifications			\boxtimes		
The One-Stop Operator (OSO) is competitively select	ted and is in compliance with s	tate and	\boxtimes		
federal guidelines					
Roles and responsibilities of the OSO are clearly ider	ntified		\boxtimes		
Roles and responsibilities of the Career Services Prov	vider (CSP) are clearly identifie	d	\boxtimes		
At least one Title I staff member and one Wagner-Pe	•	site	\boxtimes		
during operating hours, and have the capacity to pro	ovide services to all individuals				
The AJC is operating in a cost-efficient manner			\boxtimes		Ш
The AJC actively conducts outreach and provides ser workshops, job fairs and recruitment events	vices such as participation in				
Marketing materials provide an overview of all core	partner services, and are avail	able to	\boxtimes		
customers					
The AJC connects with the community through mult	iple community partnerships a	nd access	\boxtimes		
points					



The AJC staff view themselves as part of the One-Stop system, and views all customers as shared customers, creating a positive customer experience	\boxtimes		
The AJC strives to increase the percentage of customers placed in economically sustainable	\boxtimes	П	
employment			
The AJC strives to increase the percentage of customers receiving education and training	\boxtimes		
services			
The AJC has procedures in place to meet the WIOA requirements for integrated planning	\boxtimes		
and service delivery			
The AJC has identified ways to support the changing role as TANF as a one-stop partner,	\boxtimes		
including coordination of services and enrollment			
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The AJC provides employer meetings tailored to the needs of a specific group being serviced	\boxtimes		
The AJC provides initial assessment of skill level, aptitudes, abilities, and supportive service	\boxtimes		
needs			
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and national labor market areas, including job vacancy listings, information on job skills			
necessary to obtain the jobs; and information relating to local occupations in demand and			
the earnings, skill requirements, and opportunities for advancement for such occupations			
All AJC staff members can identify regional targeted sector pathways, and understands		\boxtimes	
those terms in implementation of providing services to customers		_	
The AJC has available, and provides when applicable, education and training opportunities	\boxtimes		
for customers at multiple skill and experience levels			
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customers with enrollment, including career pathways to middle class jobs, education and			
training, work-based learning, OJT, and registered apprenticeships			
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financial aid assistance for education and training			
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The AJC provides information and assistance regarding filing claims for unemployment	\boxtimes		
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FOCUS ON BUSINESS SERVICE			
The AJC establishes and develops relationships and networks with large and small	\boxtimes		
employers and their intermediaries			



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The AJC provides employer services, including qualified candidate referral, on-site	\boxtimes	
recruitment events, pre-employment testing, employee aptitude verification, and subsidies for hiring and training		
The AJC identifies technical assistance needs for improving business results and utilization	\boxtimes	
of available resources		
The local plan specifies the ways in which core partners will identify and respond to local	\boxtimes	
area economic needs		
The local plan and/or MOU define specific ways in which the AJC will match existing	\boxtimes	
business relationships and new business relationships with skilled workers		
There is a business customer feedback in place, including regularly addressing issues		
There is a cooperatively functioning Business Services Team (BST) in place	\boxtimes	Ш
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Adequate safety and security measures are in place to protect customers and staff	\boxtimes	
There is an up-to-date, easily accessible Emergency Action plan	\boxtimes	
Center hours are easily identifiable, and meet the requirement of 8:00am – 4:30pm	\boxtimes	
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The AJC contributes to the achievement of WIOA Performance Indicators for all core partners	\boxtimes	
Core partners track and periodically report performance outcomes to the LWDB, and	\boxtimes	
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The policies, processes, and actions of the AJC support of local levels of performance	\boxtimes	
RESOURCE AREAS		
There is technology available to assist all customers, including customers with disabilities	\boxtimes	
and non-English speaking customers		
Up-to-date information about services and supportive services is provided within the	\boxtimes	
Resource areas There are procedules in place for proventing abuse of internet access	[Z]	
There are precautions in place for preventing abuse of internet access		
Staff is readily available for assistance in the resource areas	\boxtimes	



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



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

Recommendations:

- Customer flow chart for services, referrals, etc.
- Establishing set assessment point at the AJC (Wagner Peyser).
- Tools / resources for access sites and partners for assessments and referrals (checklist).
- Sharing of best practices by frontline staff at Functional Team meetings.
- Case management discussions during Skills Training team meetings.
- Documentation of case management in case notes.
- Streamline communications for referrals and ensure documentation in Jobs4TN.
- Enhancing staff buy-in to the overall workforce system.
- Short, focused trainings for AJC staff on a regular basis featuring frontline staff as speakers.
 - o Recommended Topics: WIOA, LMI resources, targeted sectors and occupations, assistive technology, Jobs4TN, etc.



Vocational Rehabilitation Program

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

Location: Dyer County American Job Center 313 West Cedar Street. Dyersburg, TN 38024

Date of Survey: January 6, 2023

Survey conducted by: David Parrish, Vocational Rehabilitation Program

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

Following are the survey findings and recommendations.

1.0 Parking

- 1.1 The Dyersburg City American Job Center (AJC) is located on the street level. The parking area is directly in front of the office. There is a sidewalk between the parking lot and building that here is an appropriate curb cut. There are no obstructions or hazards.
- 1.2 There is accessible parking spaces in front of the office.

Recommendations:

2.0 Entrance

- 2.1 The AJC is accessed directly from the parking lot and there is an appropriate curb cut. Once inside, the office has an open landscape so that all areas are accessible.
- 2.3 The entry door has a buzzer at an appropriate height and staff will assist as needed.

Recommendations: None

3.0 Reception

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

Recommendations: None

4.0 Public Areas

4.1 All public areas are accessible with no hazards.

Recommendations: None

5.0 Accessible Restrooms

5.1 There is one fully accessible restroom.

Recommendations: None

6.0 Resource Room

- 6.1 The resource room can accommodate individuals with disabilities.
- 6.2 The computer available for individuals with disabilities is located on a table surface that can be easily raised.
- 6.3 Staff is available to accommodate the use of computers, printers, faxes and copiers when needed.

Recommendations: None

7.0 Communication

- 7.1 Staff is aware of how to use the phone relay service for the deaf and computers to communicate with the deaf and hard of hearing.
- 7.2 Staff is aware of contacting VR for assistance with obtaining documents in Braille.
- 7.3 Staff is aware of how to contact and schedule a sign language interpreter.

Recommendations: None

8.0 Signage

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

Recommendations: None

10.0 Fire Alarms

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

Recommendations: None

11.0 Emergency Egress Planning

11.1 There is a general knowledge of emergency egress planning.

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

Recommendations: None

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



TNLWD Specialized Center	One-Stop Certific	ation C	hecklis	t
Date: 1/5/23	•			
American Job Center Address:				
116 W. Main Street Dresden, TN				
Contact Name: Con	ntact Phone:	Contact E	mail:	
Erica Nance 731	1-501-1127	Erica.nano	e@mchra	.com
What Comprehensive AJC and Affiliate AJC are yo	our referral sites (include	addresses)	•	
Carroll County (Huntingdon), Comprehensive AJC:		-	•	
Dyer County (Dyersburg), Comprehensive AJC: 313	•	•		
, , , , , , , , , , , , , , , , , , , ,	•	O.		
CRITERIA			MET	NOT MET
REQUIRED PARTNERS				
WIOA Title I			\boxtimes	
ONE-STOP OPERATIONS				
The MOU between the LWDB and required One-S	top partners is signed and	in place	\boxtimes	
The MOU reflects the name and location of the AJ	JC and the way in which re	quired	\boxtimes	
core partners will integrate services within the cer	· ·		_	_
The center is implementing the MOU specification	ns		\boxtimes	
The One-Stop Operator (OSO) is competitively sele	ected and is in compliance	with	\boxtimes	
state and federal guidelines	·			
Roles and responsibilities of the OSO are clearly id	dentified		\boxtimes	
Roles and responsibilities of the Career Services Pr	rovider (CSP) are clearly id	entified	\boxtimes	
The AJC is operating in a cost-efficient manner			\boxtimes	
The AJC staff view themselves as part of the One-S	Stop system, and views all		\boxtimes	
customers as shared customers, creating a positive	e customer experience			
The AJC strives to increase the percentage of custo	omers placed in economic	ally	\boxtimes	
sustainable employment				
The AJC strives to increase the percentage of custo	omers receiving education	and	\boxtimes	
training services	A was a viva was a set a fa w in ta a wa	. t a d		
The AJC has procedures in place to meet the WIOA planning and service delivery	A requirements for integra	itea	\boxtimes	
The AJC has identified ways to support the changing	ng role as TANF as a one-s	top	\boxtimes	
partner, including coordination of services and en	_			
FOCUS ON PARTICIPANT SERVICE				
The AJC operates during required business hours			\boxtimes	
The AJC provides flexible operating hours, including	ng evenings and weekends	}	\boxtimes	
The AJC has available, and provides when applicab	ble, education and training	5	\boxtimes	
opportunities for customers at multiple skill and e	experience levels			
The AJC staff are competent and proficient in esta		rams, or	\boxtimes	
financial aid assistance for education and training				
The AJC provides initial assessment of skill level, a	ptitudes, abilities, and sup	portive	\boxtimes	
service needs				



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



A calendar of services and events is easily visible and available	\boxtimes	
EQUAL OPPORTUNITY ASSURANCE		
The Equal Opportunity Officer (EOO) regularly reviews the AJC's policies, procedures,	\boxtimes	
and facility for accessibility and equal opportunity		
The EOO provides recommendations and technical assistance as a result of reviews	\boxtimes	
The AJC implements veteran's priority of service requirements	\boxtimes	
Core program partner staff are periodically trained on EO practices	\boxtimes	
AJC staff demonstrate knowledge and use of assistive technologies	\boxtimes	
Reasonable accommodations are provided in order to avoid discrimination and meet individual's needs	\boxtimes	
AJC staff demonstrate appropriate and effective communication with individuals with disabilities	\boxtimes	
There is a Corrective Action Plan (CAP) in the event partners or customers identify barriers to services	\boxtimes	
PROGRAMMATIC ACCESSIBILITY		
The AJC provides basic and individualized career services in person or via technology	\boxtimes	
The AJC provides access to training, education, employment, supportive, and business services	\boxtimes	
Consistent with the "direct linkage" requirement, all services are available through a	\boxtimes	
direct connection with the AJC, either via on-site staff or via real-time technology		
The AJC identifier is highly visible inside and outside the facility, and appears on all products, programs, services information, and facilities and properties		\boxtimes
The core partners have documented the referral and direct linkage system, and	\boxtimes	
define both how referrals are tracked and that CAPs are in place		
All program services are made available and accessible to all individuals	\boxtimes	
The AJC has a system in place to promptly greet all customers, identify their needs and reason for their visit, and quickly connect them to appropriate services	\boxtimes	
The core partners take specific steps to coordinate programs, service delivery, and referrals	\boxtimes	
The AJC staff are able to make knowledgeable referrals across partner programs	\boxtimes	
The AJC staff are able to demonstrate that modified services provided to individuals with disabilities are ensured to be as effective as non-modified services provided	\boxtimes	
Assistive technology devices or auxiliary aids are available	\boxtimes	
There is a written policy in place that defines how partners make reasonable	\boxtimes	
accommodations and handle requests for accommodations		
The AJC's resources include bilingual materials or translation services, when	\boxtimes	
necessary		
There is an organizational chart that reflects and ensures staff work in functional	\boxtimes	
teams, rather than program specific teams, to coordinate programs, service delivery,		
and referrals		
CONTINUOUS IMPROVEMENT The core partners and OSO utilize performance reports and customer satisfaction		
survey results to identify methods for improvement		
Table 19 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	l	



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

Recommendations:

- Permanent hanging signage, at each entrance if possible.
- Signage regarding which door to use / accessible exit to meet accessible standards.
- Customer flow chart for services, referrals, etc.
- Tools / resources for access sites and partners for assessments and referrals (checklist).
- Sharing of best practices by frontline staff at Functional Team meetings.
- Case management discussions during Skills Training team meetings.
- Improving documentation of case management in case notes.
- Streamlining communications for referrals and ensuring documentation in Jobs4TN.
- Enhancing staff buy-in to the overall workforce system.
- Short, focused trainings for AJC staff on a regular basis featuring frontline staff as speakers.
 - o Recommended Topics: WIOA, LMI resources, targeted sectors and occupations, assistive technology, Jobs4TN, etc.

Private conference space is available within the courthouse if needed since the space available in the AJC is not private.



Vocational Rehabilitation Program

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

Location: Weakley County Courthouse

116 W. Main Street Dresden, TN 38225

Date of Survey: January 5, 2023

Survey conducted by: David Parrish, Vocational Rehabilitation Program

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

Following are the survey findings and recommendations.

1.0 Parking

- 1.1 The Dresden American Job Center (AJC) is located in the lower level of the Weakley County Courthouse. Parking is available on all four sides of the Courthouse. Topography of the parking area is relatively level. There are no obstructions or hazards.
- 1.2 There are two accessible parking spaces located along the side of Courthouse's main entrance at the walkway leading to the Courthouse entrance. The two accessible spaces share an adjacent painted striped access aisle. The universal accessibility symbol is painted on the parking lot pavement and a universal accessibility symbol is posted.
- 1.4 The walkway leading to the courthouse entrance has appropriate curb cuts and has a slight slope.

Recommendations: None

2.0 Entrance

2.1 The AJC is accessed via the Courthouse main entrance which is not manned. Once inside the Courthouse there is a ramp leading up to the main level hallway on the first floor. From there stairs or an elevator is available to access the lower level.

- 2.2 The AJC entrance is off the lower level hallway through a single 48 inch wide door that has an upper light.
- 2.3 The door is always monitored from the reception desk in the AJC.

Recommendations: None

3.0 Reception

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

Recommendations: None

4.0 Public Areas

4.1 All public areas are accessible with no hazards.

Recommendations: None

5.0 Accessible Restrooms

5.1 There is a fully accessible restroom in the lower level of the Courthouse.

Recommendations: None

6.0 Resource Room

- 6.1 The resource room can accommodate individuals with disabilities.
- 6.2 The computer available for individuals with disabilities is located on a table surface that cannot be easily raised.
- 6.3 Staff is available to accommodate the use of computers, printers, faxes and copiers when needed.

Recommendations:

- a. Relocate the computer available for individuals with disabilities to a table that can be easily raised and maintain the capability by blocks or other means to manually raise the table for wheel chair access if necessary.
- a. Inform individuals with disabilities about available accommodations either with signage or verbally.

7.0 Communication

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

- 7.2 Staff is aware of contacting VR for assistance with obtaining documents in Braille.
- 7.3 Staff is aware of how to contact and schedule a sign language interpreter.

Recommendations: None

8.0 Signage

8.1 Room identification signage within the Courthouse is properly posted.

Recommendations: None

9.0 Drinking Fountains

9.1 The drinking fountain located in the lower level hallway is accessible.

Recommendations: None

10.0 Fire Alarms

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

Recommendations: None

11.0 Emergency Egress Planning

- 11.1 There is a general knowledge of emergency egress planning.
- 11.2 Staff understands that in the event of an emergency that all rooms within the AJC need to be cleared of customers and that individuals with disabilities may require additional assistance to exit the building.

<u>Recommendations</u>: The door in the office area should be kept locked from the outside and posted on the interior as not an exit.

12.0 Elevators

12.1 The elevator is fully accessible.

Recommendations: None

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