

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

**Tuesday, October 25, 2022 – 9:30 a.m.**

DSCC Gibson County Center, Room 129 ,2071 Hwy 45 Bypass, Trenton, TN 38382 or Zoom

### **Minutes**

**Committee Members Attending:** Jimmy Williamson, Sherry Fowler, Ted Piazza; **via Zoom:** Kristie Bennett, Kristy Mercer, Keith Cursey, Melinda Goode

**Staff and Contractors Attending:** Jennifer Bane, Ginger Powell, Laura Speer, Erica Nance (OSO); **via Zoom:** Lana Burchfiel, Gina Johnson, Kena Hamm, LeAnn Lundberg, Connie Stewart (CSP), James Starnes (OSO)

**Guest Attending via Zoom:** Robin Last (SCSEP)

**Review and Approval of Minutes of July 25, 2022 Meeting:** Jimmy Williamson called the meeting to order and asked the group for comments regarding the prior meeting's minutes.

- **MOTION: Ted Piazza moved to approve the July 25, 2022 minutes as presented and Keith Cursey seconded the motion. All were in favor and the motion carried.**

**AJC Partner Update— SCSEP:** Robin Last gave a short presentation on the Senior Community Service Employment Program (SCSEP), which provides opportunities for low-income seniors to learn new skills. There are currently 30 spots across nine Northwest and Northern Middle Tennessee counties, but not all spots are currently filled. COVID has hurt enrollment, and they are seeing more 60–65 year-olds who have lived on SSI for some time seeking to return to the workforce. SCSEP places participants in government or non-profits, and pays minimum wage (\$7.25/hour). There is no age limit, and they focus on finding the best match for the participant and placement. Robin concluded by saying their biggest challenge is that they need more visibility and publicity about their program to attract more of the senior population to the program.

**One-Stop Operator (OSO) Report:** OSO Erica Nance presented the following from the attached reports:

- **AJC Partner Dashboard:** There were 1,338 visits through September and 2,449 services provided. Job Search Resource Room remained the number one visit reason for the quarter followed by Unemployment and then Title I Career Coaching. The attached Greeter reports detail the breakdown of visits and reasons by AJC for the year and service reasons by AJC for the quarter.
- **Survey Results:** There were 51 surveys completed for the quarter with 99% (50 out of 51) completely satisfied. Carroll County is not included in the survey since they were using the Jobs4TN survey. They are now using the correct survey.
- **KPI Results:** Estimated KPI results for the quarter are listed in the Dashboard but must still be verified with the state. Title I enrolled 76 of the 104 goal for Adult / Dislocated Worker. Other enrollments included new youth enrollments of 16 enrolled of the goal of 31, and 6 of the goal of 4 re-entry enrollments. Title II's new enrollment for July through September was 32, excluding Henry and Gibson, which are still pending. Title III New Enrollments results included Wagner Peyser 249 of 195 (everyone referred was co-enrolled—serving other areas and referring to Title I in those areas), SNAP E&T did not have any enrollments in the KPI areas, Veterans 29 of goal of 6, and Title II Re-Entry Participants 51 of 4. Co-Enrollments with Title I included RESEA 2 of the goal of 3, which represented all of the local RESEA referrals for the quarter. Trade Adjustment Assistance had no new enrollments to be co-enrolled. Title V had 1 SCSEP participant Exits of their goal of two.
- **Enrollment Summary Report:** The attached reports detail the number of new enrollments and carry over participants for several programs by county. There were 405 carry over and 98 new enrollments for Title I programs, with the breakdown of the new Title I cases by program and county included, along with a comparison of Title I numbers served by each area in the state. Our area receives about 4.6% of the state's allocation and has served about 5.7% of the state's total served.
- **Co-Enrollment Summary Report:** The attached report details the numbers of participants co-enrolled between Title I, Wagner Peyser, and TAA. As of September 30<sup>th</sup>, we had 4 of 12 TAA participants co-enrolled and 145 of 369 Wagner Peyser participants co-enrolled in Title I.
- **Adult Priority of Service Summary:** The new report (July through September) details the breakdown of new adult enrollments by priority category. State policy requires at least 75% be enrolled as categories 1 or 2 while federal guidance requires at least 50.1%. Of the 74 adults enrolled from July to September, 23% were in category 2 and 0% in category 1.

- **Employer Services Reports:** There have been 1,600 services provided to 1,028 employers between July and September with a few additional services for September to still be entered into the system. The breakdown by service can be viewed on the attached report. We are continuing to see events occurring in the AJCs with 69 job fair services provided so far this program year.

**Career Services Report:** Connie Stewart presented the attached report. We had YTD Total of 75 new Adult / DW enrollments toward the contract goal of 380, and 18 new youth enrollments toward the goal of 107. Occupational Skills Training accounted for 44, or 47%, of total enrollments, followed by OJT at 34, or 37% of total enrollments. Enrollments were down during the first quarter this year. Last year there were several disaster-relief and Adult Work Experience enrollments due to special grants that we did not have this year. There were close to 30 less training enrollments with truck drivers accounting for about 15 fewer enrollments this year, six less nursing, and six less radiology enrollments. We also had about 10 less OJTs in the first quarter but have caught up in October to last year's numbers as of October.

**Business Services Report:** Ginger Powell discussed the following from the attached Business Services Report:

- **On-the-Job Training (OJT):** To date, 37 individuals have been enrolled with 21 employers for OJT, 0 have completed, 6 did not complete, and 31 are still in training. Employers are hiring more rapidly and can't always wait on the enrollment process which has slowed down referrals at times, but we have served the same number as of October that we had served this time last year.
- **Incumbent Worker Training (IWT):** No IWT funding is currently available.
- **Job Fair/Hiring Events/Pending Events:** We have had several multi-employer events and several already planned for the upcoming quarter, including a Regional Red, White, and You Veterans Hiring Event.
- **Apprenticeships:** There was one newly registered apprenticeship program at Trenton Light and Water this quarter.
- **Rapid Response:** There have been no new Rapid Response events since the last report.
- **Other:** Several speaking engagements have been conducted as listed on the report, as well as demonstrations of the TRANSFR Virtual Reality headsets. Much of September was spent planning for the in-person manufacturing day tours that have been taking place throughout October for National Manufacturing Day.

**Policy Changes:** Jennifer Bane reviewed the attached summary of proposed changes which are also indicated in the attached policies. The goal is to align the NW and SW policies as much as possible. Most of the significant proposed changes are to the Supportive Services policy to broaden it to better align with the existing SW offerings, including increasing the limit from \$1,500 to \$2,500 per participant, excluding transportation and ITA-related items. The policy would also allow for non-traditional childcare to better meet childcare needs, but would still not be enough to cover the entire cost due to limited funds. Ted Piazza asked about the impact on the budget. Jennifer stated we have seen less costs per participants for training due to the many other types of financial aid out there, and that we have many participants who only receive travel assistance. Since we are seeing fewer enrollments and less cost per enrollment, so we are hoping this will help the enrollments by expanding available services. We do have in the policies that we are LAST DOLLAR and that participant will have to provide documentation to get assistance.

- **MOTION:** Ted Piazza moved to approve the proposed changes to the policies listed below as described in the attached summary and detailed in the attached policies as presented. Keith Cursey seconded the motion. All were in favor and the motion carried.
  - Co-Enrollment of Customers
  - Conflict of Interest (Service Delivery)
  - Electronic Case Files
  - Individual Training Account
  - Initial Assessment
  - Supportive Services
  - Verifying Identity and Employment Eligibility
  - Work-Based Training
  - Adult and Dislocated Worker Eligibility

#### **Other:**

- **Vice-Chair Vacancy:** Lana Hammons has accepted another job out of our region so the committee is in need of a replacement Vice-Chair. The vice-chair must be a private-sector representative.
- **2023 Committee Dates/Format:** The committee discussed the proposed dates for 2023 and elected to continue with a hybrid format.
- **Future Meeting Dates & Upcoming Events:** Jennifer Bane reviewed the information listed on the attached agenda.

*Respectfully submitted, Lana Burchfiel, Public Information Specialist*

Northwest TN Workforce Board  
**American Job Center Committee**  
Tuesday, October 25, 2022 – 9:30 a.m.

DSCC Gibson County Center, Room 129  
2071 Hwy 45 Bypass  
Trenton, TN 38382

[Join Zoom Meeting](#)  
Meeting ID: 896 4940 1077  
Passcode: 829916

Chair - Rita Alexander

Vice Chair – TBD

Agenda

1. Welcome and Call to Order Jimmy Williamson
2. Review and Approval of Minutes – July 25, 2022 meeting (**Vote Required**) Jimmy Williamson
3. AJC Partner Update – SCSEP Robin Last, Senior Community Service Employment Program
4. One-Stop Operator Report Erica Nance
  - a. AJC Partner Dashboard
    - i. Survey Results
    - ii. KPI Results
  - b. VOS Greeter Reports
  - c. Access Point Update
  - d. Enrollment & Co-Enrollment Summary Reports
  - e. Priority of Service Report
  - f. Employer Services Report
5. Career Services Report Connie Stewart
6. Business Services Report Ginger Powell
7. Policy Changes (**Vote Required**) Jennifer Bane
  - a. Co-Enrollment of Customers
  - b. Conflict of Interest (Service Delivery)
  - c. Electronic Case Files
  - d. Individual Training Account
  - e. Initial Assessment
  - f. Supportive Services
  - g. Verifying Identity and Employment Eligibility
  - h. Work-Based Training
  - i. Adult and Dislocated Worker Eligibility
8. Other Jennifer Bane
  - a. Vice-Chair Vacancy
  - b. 2023 Committee Meeting Dates / Format
    - Tuesday, 9:30 am, January 24<sup>th</sup>, April 25<sup>th</sup>, July 25<sup>th</sup>, October 24<sup>th</sup>
    - Hybrid, In-Person Only, or Zoom Only format?

Future Meeting Dates & Upcoming Events

- State Board Meeting: November 4<sup>th</sup> (Nashville / YouTube)
- Next Board Meeting: Tuesday, November 15<sup>th</sup>, 11:30 am, Northwest HRA/DD (Martin) & Zoom
- Virtually Speaking Webinar: December 1<sup>st</sup>, 9:00 am (Zoom)
- **Annual Conflict of Interest Forms: Due December 31, 2022**
- Tentative 2023 Board Meeting Dates: Tuesdays, 12:00 pm (lunch at 11:30 am),
  - February 28<sup>th</sup>, May 23<sup>rd</sup>, August 22<sup>nd</sup> (annual / joint meeting with SW), November 28<sup>th</sup>

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

**Monday, July 25, 2022 – 10:00 a.m.**

DSCC Gibson County Center, Room 112, 2071 Hwy 45 Bypass, Trenton, TN 38382 or Zoom

**Minutes**

**Committee Members Attending:** Sherry Fowler, Rita Alexander, Ted Piazza; **via Zoom:** Kristie Bennett, Mark Chandler, Willie Huffman, Lana Hammons, Kristy Mercer

**Staff and Contractors Attending:** Jennifer Bane, Ginger Powell, Erica Nance (OSO), LeAnn Lundberg, Kena Hamm, Laura Speer; **via Zoom:** Lana Burchfiel, Gina Johnson, Jennifer Eppley and James Starnes, (OSO)

**Guest Attending via Zoom:** Gina Abbott

**Review and Approval of Minutes of April 25, 2022 Meeting:** Rita Alexander called the meeting to order and asked the group for comments regarding the prior meeting's minutes and noting the change of two dates for the approval of the minutes in the last meeting to both read January 24, 2022.

- **MOTION:** Ted Piazza moved to approve the April 25, 2022 minutes with above mentioned corrections and Kristie Bennett seconded the motion. All were in favor and the motion carried.

**AJC Partner Update— TN Opportunity Program (TOPS):** Sherry Fowler, TOPS representative for West TN, gave a short presentation on TOPS, a low-income farm program that works with seasonal and migrant agricultural workers. This program that has been around for over 40 years, provides training, job placement, and work experiences. Anyone who has worked in any type of agriculture (including row crop, livestock, fencing, hay baling, fish farming, some landscaping, beekeeping, logging, etc.) may qualify for the program. TOPS can coordinate with WIOA and other programs. Enrollments are currently down, and she asked if anyone has any interest or referrals to visit [www.tnoppportunityprograms.org](http://www.tnoppportunityprograms.org), on Facebook at Tennessee Opportunity Programs-NFJP, or contact her directly at [sherry.fowler@tnoppportunity.org](mailto:sherry.fowler@tnoppportunity.org) or call 731-571-6937. They may also call the office in Alamo at 731-696-4860.

**One-Stop Operator (OSO) Report:** OSO Erica Nance presented the following from the attached reports:

- **AJC Partner Dashboard:** There were 8,630 visits through June and 15,386 services provided. Job Search Resource Room remained the number one visit reason for the quarter followed by Unemployment. Relocating staff, along with Jobs4TN being down led to lower reported numbers for visits in June.
- **Survey Results:** There were 187 surveys completed for the quarter with 98% (184 out of 187) completely satisfied.
- **KPI Results:** Estimated KPI results for the quarter are listed in the Dashboard but must still be verified with the state. Title I exceeded their goal of 66 Adult / Dislocated Worker total enrollments with 99 enrolled. Other enrollments included new youth enrollments of 15 enrolled of the goal of 27, and 14 of the goal of 15 re-entry enrollments. Title II's Jackson State's enrollment number is pending and Weakley County Schools exceeded their goal of 62 with 77 enrollments. Title III New Enrollments results included Wagener Peyser 595 of 206, SNAP E&T 38 of 24, Veterans 18 of goal of 6, and Re-Entry Participants 18 of 15. Co-Enrollments with Title I included RESEA 13 of 9, and Trade Adjustment Assistance 40% (number is currently being disputed due to two individuals being over income and one declining Title I services). Title V had 0 SCSEP participant Exits, not meeting their goal of 2.
- **VOS Greeter Reports:** The attached reports detail the breakdown of visits and reasons by AJC for the year and service reasons by AJC for the quarter.
- **Enrollment Summary Report:** The attached reports detail the number of new enrollments and carry over participants for several programs by county. There were 325 carry over and 848 new enrollments for Title I programs, with the breakdown of the new Title I cases by program and county included, along with a comparison of Title I numbers served by each area in the state. Our area receives about 4.8% of the state's allocation and has served about 8.1% of the state's total served. Our area accounted for 11.1% of new enrollments in the state through the fourth quarter of the program year.
- **Co-Enrollment Summary Report:** The attached report details the numbers of participants co-enrolled between Title I, Wagner Peyser, and TAA. As of June 30<sup>th</sup>, we had 8 of 20 TAA participants co-enrolled and 260 of 655 Wagner Peyser participants co-enrolled in Title I.
- **Adult Priority of Service Summary:** The new report (July through June) details the breakdown of new adult enrollments by priority category. State policy requires at least 75% be enrolled as categories 1 or 2 while federal

guidance requires at least 50.1%. Of the 15 adults enrolled from April to June, 13.3% were in category 2 and 0% in category 1. Overall, between July and June 41.9% of the Adults enrolled were in category 1 or 2.

- **Target Populations Report:** The attached report shows 923 active participants as of June, including 174 who are youth-aged individuals, 7 veterans, and 499 individuals with barriers to employment including 59 individuals with disabilities, 155 underemployed, 83 offenders, 34 in a high poverty area, and 314 low-income individuals.
- **Employer Services and Survey Reports:** There have been 4,212 services provided to 2,301 employers between July and June. The breakdown by service can be viewed on the attached report. We are continuing to see more events occurring in the AJCs with 106 job fair services provided so far this program year.

**Career Services Report:** Jennifer Bane presented the attached report for Connie Stewart. We had YTD Total of 347 new Adult / DW enrollments, which exceeded the contract goal of 296, and 94 new youth enrollments, exceeding the goal of 78. Occupational Skills Training accounted for 166, or 38%, of total enrollments, followed by OJT at 154, or 35% of total enrollments. Of the 166 enrolled Occupational skills training, healthcare was the largest sector followed by transportation. A breakdown of training payments by provider for the year is also included in the report. The REAP program only had 4 enrolled in the class this year with 3 completing the classroom training, and 2 continuing on in work experience.

**Business Services Report:** Ginger Powell discussed the following from the attached Business Services Report:

- **On-the-Job Training (OJT):** To date, 161 individuals have been enrolled with 33 employers for OJT, 104 have completed, 39 did not complete, and 18 are still in training. Over \$229,500 has been expended for an average cost per participant of about \$2,200.
- **Incumbent Worker Training (IWT):** As of June 30<sup>th</sup>, we trained 94%, or 627, of the 664 proposed, and had 27 total contracts. Over \$364,100 of the \$398,400 available was expended by employers.
- **Job Fair/Hiring Events/Pending Events:** We have increased Job Fairs on-site and in-centers with no sign of slowing down. Our employers are still facing staffing shortages.
- **Apprenticeships:** We continue to see interest in apprenticeships and have added several new programs. The Hamilton-Ryker apprenticeships listed are both healthcare related with Hamilton-Ryker TalentGro serving as the sponsor for the local healthcare employers. Tencom is a new IT program, and the City of Dyersburg has a new firefighter / paramedic program. We are currently working on a new lineman apprenticeship as well.
- **Rapid Response:** There have been no new Rapid Response- events since the last report.
- **Other:** We continue to have several requests for wage information from employers. Ginger mentioned the upcoming Virtually Speaking webinar, "Betting on Talent" on Sept. 1 at 9 am. Plans for Manufacturing Day Events have begun with hopes for more in-person events. We will continue working with TRANSFR VR for virtual job shadowing in Lake County, and have purchased 11 more of these headsets to use in the other high schools. Kristie Bennett mentioned she would like to have several photos from the events to promote what our area is doing.

**Other:**

- **Future Meeting Schedule-Time Change:** Jennifer asked options on changing the future AJC Committee meetings to 9:30 am. A change of the day of the week for the meetings was mentioned as well. Further discussion is planned after hearing from the Outreach and Opportunities Committee.
- **Southwest ( SW) Partnership Update:** Jennifer provided an update on the transition to becoming the fiscal agent / staff to the board for the SW area and introduced Kena Hamm from Southwest who is the Director of Program Services. We posted openings for the Business Services positions and are interviewing applicants on July 29<sup>th</sup>. We also posted for the part-time fiscal position in Dyersburg and will hold more interviews tomorrow. We finally got the first contract from the State, but it needed corrections. Hoping to get all the contracts this week. CSP and OSO contracts done. Margaret Prater is working on aligning the NW and SW policies and on the name change from "Northwest TN Workforce Board Inc" to "Workforce Innovations." We have also been replacing board members for Southwest, moving centers, etc. The next board meeting will be a joint meeting with NW and SW. Jenn clarified there are still two separate boards and separate boards voting on their respective items. The University of Memphis TANF grant staff will be there to make a presentation. The office of re-entry had reached out about doing a town hall meeting same day as well, but this will occur after lunch.

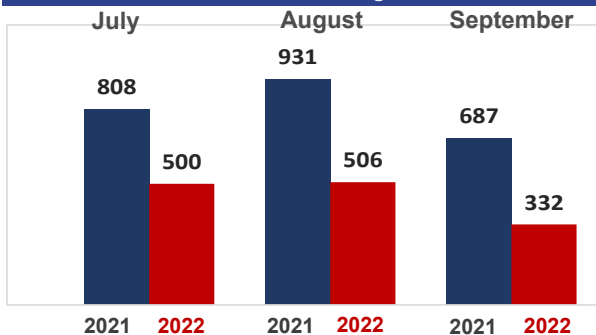
**Future Meeting Dates & Upcoming Events:** Jennifer Bane reviewed the upcoming meeting dates and events as listed on the attached agenda then the meeting was adjourned.

Respectfully submitted, Lana Burchfiel, Public Information Specialist

# NORTHWEST TN

Serving the counties of Benton, Carroll, Crockett, Dyer, Gibson, Henry, Lake, Obion, & Weakley

## NW TN American Job Center (AJC) Visits



**1,338**  
Visitors Received PY22

**2,449**  
Services to Date PY22

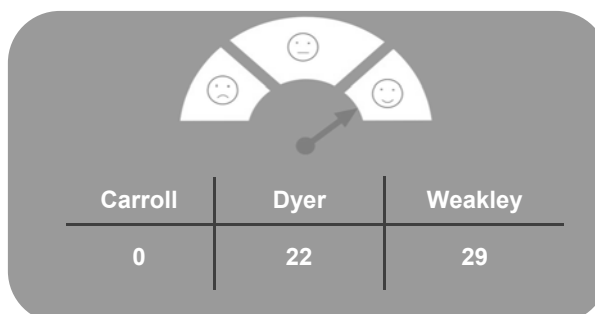
## AJC Surveys Results

Overall, how satisfied were you with our services?



\*From Jul-Sept 2022

Number of Completed AJC Surveys by County for PY22Q1



## PY22Q1 Top 10 Reasons for Visits

1. Job Search Resource Room
2. Unemployment
3. Career Coaching/WIOA Title I
4. Job Search Assistance
5. Networking Event
6. HiSet
7. Resume Assistance
8. Adult Education
9. Career Coach/Workforce Essentials
10. Career Coach/Youth

## Business Services

**21**  
Total On-the-Job Training Contracts as of 9/30/22

**37**  
Enrolled in Training\*

**0 (0%)**  
Completed

**6 (16%)**  
Did not complete\*

**31 (84%)**  
Still in Training\*

**0**  
Total Incumbent Worker Training Contracts as of 9/30/22

**0**  
Proposed to train

**0**  
Trained (0%)

**197**  
Job seekers attended Job Fairs

**9**  
Total Job Fairs hosted (including 2 multi-employer job fairs and 39 employers)

**1**  
Registered Apprenticeship Occupations

**0**  
Apprentices Trained

\*From Jul 2022– Sept 2022

## Things to Note

- NWTNWB Committee Meetings:
  - American Job Center Committee meeting: Oct 25th, 9:30 am
  - Outreach & Opportunities Committee Meeting: Oct 25th, 11 am
  - Executive Committee Meeting: Oct 26th, 10:00 am
- Next Board Meeting: Nov 15th, 12 pm
- Visit us online to view upcoming job fairs, workshops, and other events:

@NWTNjobs

@nwtjobs

www.nwtjobs.org

**JOBS4TN.GOV**

## Current Unemployment Rate by County (August 2022)

Benton 4.3% ▼ | Carroll 3.9% ▼ | Crockett 3.1% ▼ | Dyer 3.8% ▼ | Gibson 3.5% ▼ | Henry 3.7% ▼ | Lake 5.3% ▼ | Obion 4.0% ▼ | Weakley 3.4% ▼

## Title I Career & Training Services

	Adult	Dislocated Workers	Youth	In-School Youth	Total Title I	Re-Entry Enrollments
Jul-Sept Goals	104		31	9	135	4
Jul-Sept 2022 New Enrollments	71	5	16	2	92	6

The Workforce Innovation and Opportunity Act (WIOA) consists of five core partner programs: Titles I—IV, and Temporary Assistance for Needy Families (TANF). These partners provide services through the American Job Center network in order to develop a quality workforce system to meet the needs of area employers and job seekers.

## Title III & Other Employment Services

New Enrollments	Goals Jul-Sept	New Enrollments Jul-Sept
Wagner Peyser	195	249
SNAP	n/a	12
SNAP E&T AE Co-Enrollments	1	0
SNAP E&T Job Retention Services	1	0
SNAP E&T Job Search Training	1	0
Jobs for Veterans	6	29
Re-Entry Participants	4	51

Co-Enrollments with Title I	Goals Jul-Sept	Jul-Sept Co-Enrollments
RESEA	3	2
Trade Adjustment Assistance	90%	n/a

## Title V

	New Enrollments	Participant Exits for employment Jul-Sept	Participant Exits Jul-Sept
Senior Employment (SCSEP)	2	1	2

## Special Projects

In the latest Virtually Speaking Webinar, *Betting on Talent: Maximizing Impact of Employee Engagement*, Mitch Fielder, Owner and Operator of Chick-fil-A Dyersburg, shared how he finds talent, handles the interview selection process, and how important it is to invest in the team. This is great information if you are an employer struggling to get and maintain faithful employees, or if you are a jobseeker looking to make a good impression in your career!

The Virtually Speaking Webinar series launched March 4, 2021, in an effort to connect with Northwest Tennessee employers in a Covid-cautious way and provide relevant and meaningful content in a no-cost and convenient method. Each episode explores a different topic relevant to area employers, and includes NWTN Business Services Representatives alongside experts in the selected topic.

All webinars are recorded, and may be found on our website at <https://nwtjobs.org/employers/virtually-speaking>



## Title II Adult Education Enrollments

	Jul-Sept 2022 Goal	Jul-Sept Enrollments	YTD Jul-Sept
New Enrollments	N/A	32	32
Co-Enrollments w SNAP	1	0	0

\*Henry & Gibson still pending

## Temporary Assistance for Needy Families

TANF had **123** active cases in Northwest TN, including **42** employed. **Ten** were closed in successful employment.

## Title IV Vocational Rehabilitation (pending)

Vocational Rehabilitation served X customers in Northwest Tennessee, including **XX** new enrollments during the quarter. **XXX** were closed in successful employment.



### TRAFFIC COUNTS LIST BY MUTIPLE REASONS - 2022-2023

2022-2023	Dresden	Dyersburg	Huntingdon	Comprehensive Subtotal	Total AJC
Jul-22	238	251	410	661	899
Aug-22	164	357	410	767	931
Sep-22	29	269	321	590	619
<b>Subtotal</b>	<b>431</b>	<b>877</b>	<b>1,141</b>	<b>2,018</b>	<b>2,449</b>
Mo. Avg	144	292	380	673	816
% Avg.	17.6%	35.8%	46.6%	82.4%	100.0%

### TRAFFIC COUNTS LIST BY INDIVIDUAL VISIT 2022-2023

2022-2023	Dresden	Dyersburg	Huntingdon	Comprehensive Subtotal	Total AJC
Jul-22	128	154	218	372	500
Aug-22	90	211	205	416	506
Sep-22	15	159	158	317	332
<b>Subtotal</b>	<b>233</b>	<b>524</b>	<b>581</b>	<b>1,105</b>	<b>1,338</b>
Mo. Avg	78	175	194	368	446
% Avg.	17.4%	39.2%	43.4%	82.6%	100.0%

### Individual Visit Monthly Average Goal

	Dresden	Dyersburg	Huntingdon	Total AJC
<b>PY 22 Actual</b>	<b>78</b>	<b>175</b>	<b>194</b>	<b>446</b>
<b>Goal</b>	199	534	365	1,098
<b>Difference</b>	<b>-121</b>	<b>-359</b>	<b>-171</b>	<b>-652</b>
<b>% of Goal Met</b>	<b>39%</b>	<b>33%</b>	<b>53%</b>	<b>41%</b>



<b>July-September 2022 Visit Reasons</b>	<b>Dresden</b>	<b>Dyersburg</b>	<b>Huntington</b>	<b>Totals</b>
Job Search Resource Room	218	392	520	<b>1,130</b>
Unemployment	145	224	192	<b>561</b>
Cr. Coachg/ WIOA Title 1	37	112	65	<b>214</b>
Job Search Assist		52	66	<b>118</b>
Networking Event/Granges Training			64	<b>64</b>
HiSET		2	56	<b>58</b>
Resources			35	<b>35</b>
Resume Assistance	2	12	17	<b>31</b>
Adult Education	3	26	1	<b>30</b>
Networking Event/Carroll Co. Drug Coalition			24	<b>24</b>
Networking Event/ Community Advisory Board			22	<b>22</b>
Cr.Coach WF Ess.	21			<b>21</b>
Networking Event/Traf-Mark Training			15	<b>15</b>
Cr.Coach/Youth		13		<b>13</b>
Employer Ck-in	1		12	<b>13</b>
Voc Rehab	2	6	5	<b>13</b>
RESEA		5	6	<b>11</b>
TAA/TRA		11		<b>11</b>
Veterans Servs		10	1	<b>11</b>
Networking Event/Auto Zone			9	<b>9</b>
Served in Military?		5	2	<b>7</b>
Job Fair-Untied Stated Postal Service			7	<b>7</b>
Networking Event			6	<b>6</b>
Job Fair-Manpower			5	<b>5</b>
Networking Event/United States Postal Service			5	<b>5</b>
Workshop	1	3		<b>4</b>
SCSEP - Senior Emploment		2	1	<b>3</b>
Re-Entry			2	<b>2</b>
SNAP E&T (Appt)	1		1	<b>2</b>
Job Fair/Northwest Correctional Complex		1		<b>1</b>
Job Fair-Auto Zone			1	<b>1</b>
Networking Event/Manpower			1	<b>1</b>
SNAP E&T (Orient.)		1		<b>1</b>
<b>TOTALS</b>	<b>431</b>	<b>877</b>	<b>1,141</b>	<b>2,449</b>
<b>List - INDIVIDUAL</b>	<b>233</b>	<b>524</b>	<b>581</b>	<b>1,338</b>

Enrollment Summary by Program	WP		TITLE I		TAA		SNAP		Adult Education		ALL PROGRAMS		% of NWTN	
	Carry Forward	New Enrollment	Carry Forward	New Enrollment	Carry Forward	New Enrollment	Carry Forward	New Enrollment	Carry Forward	New Enrollment	Carry Forward	New Enrollment	Carry Forward	New Enrollment
Northwest Tennessee	361	248	405	98	12	1	46	12	91	70	915	429	68.1%	31.9%
American Job Center - Alamo-Specialized CTR*	0	0	0	0	0	0	0	0	0	1	0	1	0.0%	0.1%
American Job Center - Paris Specialized CTR*	0	0	0	0	0	0	0	0	1	0	1	0	0.1%	0.0%
American Job Center - Camden- Specialized CTR*	0	0	0	0	0	0	0	0	12	4	12	4	0.9%	0.3%
American Job Center - Huntingdon *	152	98	104	34	4	0	4	2	13	18	277	152	20.6%	11.3%
American Job Center - Tiptonville -Specialized CTR*	0	0	0	0	0	0	0	0	3	0	3	0	0.2%	0.0%
American Job Center - Dyersburg *	149	102	186	43	8	1	13	5	26	11	382	162	28.4%	12.1%
American Job Center - Dresden Specialized CTR *	57	48	115	21	0	0	4	2	10	23	186	94	13.8%	7.0%
American Job Center - Union City *	0	0	0	0	0	0	0	0	26	11	26	11	1.9%	0.8%
LWDA 12 000 Administrative Office *	3	0	0	0	0	0	0	0	0	0	3	0	0.2%	0.0%
SNAP E&T Benton Co	0	0	0	0	0	0	0	1	0	1	0	2	0.0%	0.1%
SNAP E&T Crockett	0	0	0	0	0	0	5	1	0	0	5	1	0.4%	0.1%
SNAP E&T Gibson Co	0	0	0	0	0	0	9	1	0	0	9	1	0.7%	0.1%
SNAP E& T Henry Co	0	0	0	0	0	0	3	0	0	0	3	0	0.2%	0.0%
SNAP E&T Lake Co	0	0	0	0	0	0	2	0	0	0	2	0	0.1%	0.0%
SNAP E&T Obion Co	0	0	0	0	0	0	6	0	0	1	6	1	0.4%	0.1%
LWIA/Office	WP		WIOA		TAA		SNAP		Adult Education		ALL PROGRAMS		% of NWTN	
Total:	609		503		13		58		161		1,344			

### Co-Enrollment Summary Report

American Job Center	Total WP Participants	WP Not In WIOA	WP Enrolled In WIOA	Total WIOA Participants	WIOA Enrolled In WP	Total TAA Participants	TAA Enrolled In WIOA	TAA Not In WIOA
American Job Center - Huntingdon *	166	82	84	138	79	4	3	1
American Job Center - Dyersburg *	139	97	42	227	23	8	1	7
American Job Center - Dresden Specialized CTR *	64	45	19	136	16	0	0	0
Totals	369	224	145	501	118	12	4	8

**Title I Participants Served by American Job Center**  
**July 1, 2022 -September 30, 2022**

County	Adults	Dislocated Worker	Youth	ISY	OSY	IWT	TOTAL Served	Percentage Served	Percentage of Allocation	Difference
Benton	13	8	10	4	6	0	31	6.2%	7.0%	-0.8%
Carroll	19	6	14	5	9	0	39	7.8%	12.1%	-4.3%
Crockett	6	4	1	0	1	0	11	2.2%	4.6%	-2.4%
Dyer	64	10	34	8	26	0	108	21.5%	14.8%	6.7%
Gibson	36	10	24	16	8	0	70	13.9%	18.9%	-5.0%
Henry*	35	4	8	1	7	0	47	9.3%	12.9%	-3.5%
Lake	15	4	23	16	7	0	42	8.3%	3.8%	4.5%
Obion	45	6	10	2	8	0	61	12.1%	12.3%	-0.2%
Weakley	70	7	17	7	10	0	94	18.7%	13.7%	5.0%
<b>TOTALS</b>	<b>303</b>	<b>59</b>	<b>141</b>	<b>59</b>	<b>82</b>	<b>0</b>	<b>503</b>	<b>100%</b>	<b>100%</b>	<b>0%</b>

%      60%      12%      28%      12%      16%      0%

**Title I Enrollment Summary by LWDA**  
**Date Range 07/01/2022 - 09/30/2022**

Local Area	Carry Forward	New Enrollment	Served	% Served	% of Allocation	Difference
Northeast Tennessee	316	83	399	4.5%	6.9%	-2.4%
Northwest Tennessee	405	98	503	5.7%	4.6%	1.1%
Upper Cumberland	466	75	541	6.2%	4.5%	1.7%
Southwest Tennessee	417	137	554	6.3%	4.3%	2.0%
Southern Middle Tennessee	436	133	569	6.5%	5.8%	0.7%
Southeast Tennessee	563	133	696	7.9%	9.3%	-1.4%
East Tennessee	795	294	1,089	12.4%	15.6%	-3.2%
Greater Memphis	1,118	729	1,847	21.1%	23.1%	-2.0%
Northern Middle Tennessee	2,184	391	2,575	29.4%	25.9%	3.5%
<b>Total</b>	<b>6,700</b>	<b>2,073</b>	<b>8,773</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>

### Adult Priority of Service Summary

July to September 2022

Priority Level	July - Sept. Number Eligible	Q1 % Enrolled
*1 - Veterans and Eligible Spouses who are Public Assistance Recipient OR Low Income OR Basic Skills	0	0.0%
*2 - Non-Covered Persons who are Public Assistance Recipient OR Low Income OR Basic Skills Deficient	17	23.0%
3 - Veterans and Eligible Spouses who are not included in Priority Group 1	4	5.4%
5 - Non-Covered Persons Outside the WIOA-Priority Groups	53	71.6%
<b>Totals</b>	<b>74</b>	<b>100.0%</b>

\*TN Department of Labor and Workforce Development Policy requires 75% of total Adults served to be eligible under Priority Category 1 or 2. USDOL requires at least 50.1%. As of September 2022, the NW percentage is 28.4% of new enrollments for categories 1 and 2.

## Services Provided Employer Report

### Total Employers Served

Sept. not final

<u>Services</u>	<u>JULY</u>	<u>AUG</u>	<u>SEP</u>	<u>TOTAL</u>	<u>%</u>
E-17 Apprenticeship Employer Outreach	2	8	5	15	1.5%
E10-Employer Services Training	35	107	29	171	16.6%
E11-Employer Services Training-IWT	16	2		18	1.8%
E01-On-Site Visit Planning Layoff Response				0	0.0%
E93-Notification to employer or resumes via Virtual Recruiter	1	2	3	6	0.6%
E92-Notification to employer of potential applicant				0	0.0%
E07-Promotional Call	29	183		212	20.6%
E06-Provided Canadidate Pre-Screening				0	0.0%
E05-Provided Detail Labor Market Study	2	4	2	8	0.8%
E02-Provided Job Fair Services	8	2	59	69	6.7%
E03-Provided Job Order Follow-Up/Assistance	8	95	15	118	11.5%
E04-Provided Recruitment Services	4	1		5	0.5%
E12-Rapid Response Services/Business Downsizing				0	0.0%
E90-Referred Qualified Applicants-Staff Assisted	1	2		3	0.3%
E08-Reviewed Resumes and Referred Eligible Individuals	7	14	10	31	3.0%
E09-Services to Untapped Targeted Demographic Groups	24	21	22	67	6.5%
E13-Tax Credits or Incentives for Employers (WOTC)				0	0.0%
E15-Strategic Planning/ECD with Employers				0	0.0%
E14-Workforcce Information for Employers	110	178	17	305	29.7%
<b>Total Employers Served</b>	<b>247</b>	<b>619</b>	<b>162</b>	<b>1,028</b>	<b>100.0%</b>

### Total Services Provided

<u>Services</u>	<u>JULY</u>	<u>AUG</u>	<u>SEPT</u>	<u>TOTAL</u>	<u>%</u>
E-17 Apprenticeship Employer Outreach	2	13	5	20	1.3%
E10-Employer Services Training	93	178	80	351	21.9%
E11-Employer Services Training-IWT	31	7		38	2.4%
E01-On-Site Visit Planning Layoff Response				0	0.0%
E93-Notification to employer or resumes via Virtual Recruiter	37	47	55	139	8.7%
E92-Notification to employer of potential applicant				0	0.0%
E07-Promotional Call	29	202		231	14.4%
E06-Provided Canadidate Pre-Screening				0	0.0%
E05-Provided Detail Labor Market Study	2	4	4	10	0.6%
E02-Provided Job Fair Services	10	2	59	71	4.4%
E03-Provided Job Order Follow-Up/Assistance	11	107	22	140	8.8%
E04-Provided Recruitment Services	4	1		5	0.3%
E12-Rapid Response Services/Business Downsizing				0	0.0%
E90-Referred Qualified Applicants-Staff Assisted	1	6		7	0.4%
E08-Reviewed Resumes and Referred Eligible Individuals	31	51	62	144	9.0%
E09-Services to Untapped Targeted Demographic Groups	33	21	61	115	7.2%
E13-Tax Credits or Incentives for Employers (WOTC)				0	0.0%
E15-Strategic Planning/ECD with Employers				0	0.0%
E14-Workforce Information for Employers	111	192	26	329	20.6%
<b>Total Services Provided</b>	<b>395</b>	<b>831</b>	<b>374</b>	<b>1,600</b>	<b>100%</b>

## Career Services Provider Monthly Report Sep-22

### Staff Changes

Hired Lisa Rhamy- Youth Employment Specialist

### Enrollments by Program (July 1, 2022 - June 30, 2023)

	Adult	DW	OSY	ISY	Total	Percentage
Occupational Skills Training	36	5	3	0	44	47%
Work Experience	0	0	10	4	14	15%
Youth Incentives			0	0	0	0%
Transitional Jobs	0	0			0	0%
On-the-Job Training	33	0	1	0	34	37%
Apprenticeship	0	0	0	0	0	0%
TAA Co-Enrollment		1			1	1%
Total	69	6	14	4	93	100%
Contract Goal	380			107	487	100%
YTD Total	75			18	93	19%
Remaining	305			89	394	81%

### Enrollments by County

	Adult	DW	OSY	ISY	Total	Percentage
Benton	5	2	3	0	10	11%
Carroll	12	3	3	0	18	19%
Crockett	0	1	0	0	1	1%
Dyer	16	0	4	1	21	23%
Gibson	3	0	0	2	5	5%
Henry	7	0	1	0	8	9%
Lake	1	0	0	0	1	1%
Obion	12	0	2	0	14	15%
Weakley	13	0	1	1	15	16%
Total	69	6	14	4	93	100%
Percentage	74%	6%	15%	4%	100%	

### Training Enrollments by Sector / Institution

Training Provider	Healthcare	Manufacturing	Other	Transportation	Grand Total
Bethel					
Dental Staff School	1				1
Drive Train					
DSCC	9				9
JSCC					
NALTC			3		3
Road Runner				4	4
TCAT Crump					
TCAT Jackson					
TCAT McKenzie		6	3		9
TCAT Newbern					
TCAT Paris	7	1			8
University of Memphis					
UTM	1		3		4

Union University					
East TN State Univ.					
Murray State					
Complete Dental Care					
TCAT Northwest	3		1	2	6
Grand Total	21	7	10	6	44

Training Provider	Sum of Amount Paid	*
Road Runner	\$ 11,784.00	
Dental Staff	\$ 8,000.00	
Union University	\$ 7,242.00	
NALTC	\$ 4,000.00	
Dyersburg State Community	\$ 2,272.50	
Grand Total	\$ 33,298.50	

*\*Reflective of invoices paid as of 7/1/22; may include prior year enrollments*

#### Events / Marketing

High Schools: Peabody (Career Fair), Lake County  
Postsecondary: Dyersburg State (Nursing Orientation)



# BUSINESS SERVICE REPORT

REVISED

Obligations: \$ 78,796.80

On-the-Job Training - July 1, 2022 - September 30, 2022

Total Paid to Date: \$ -

Company	Year-to-date Enrolled 7-1-2022	Completed Training	Did Not Complete	Percent Complete	Currently in Training	Paid Invoice
Allegion / Republic Door and Frames	0	0	0	#DIV/0!	0	\$ -
Allergy Lab Solutions, LLC	0	0	0	#DIV/0!	0	\$ -
Alliance Staffing Group, LLC	0	0	0	#DIV/0!	0	\$ -
Amteck, LLC	1	0	0	#DIV/0!	1	\$ -
Auston Mealer's Restaurant Equipment Service	3	0	0	#DIV/0!	3	\$ -
BAM2 Inc	2	0	0	#DIV/0!	2	\$ -
Big Bore, LLC	1	0	0	#DIV/0!	1	\$ -
City of Dyersburg	2	0	0	#DIV/0!	2	\$ -
City of Gleason	0	0	0	#DIV/0!	0	\$ -
Dana Sealing Products, LLC	1	0	1	0.0%	0	\$ -
Develey Mustard and Condiment Corp.	9	0	4	0.0%	5	\$ -
Excel Boat Company, LLC	5	0	1	0.0%	4	\$ -
Granges Americas	7	0	0	#DIV/0!	7	\$ -
Hitachi Energy	2	0	0	#DIV/0!	2	\$ -
Hornsby's Garage Inc.	1	0	0	#DIV/0!	1	\$ -
NSK Steering Systems America, Inc.	0	0	0	#DIV/0!	0	\$ -
Pediatric Associates of West Tennessee, PLLC	0	0	0	#DIV/0!	0	\$ -
Raspberry Tire and Service Center	0	0	0	#DIV/0!	0	\$ -
Tencom Services	0	0	0	#DIV/0!	0	\$ -
Thor Boats, LLC	2	0	0	#DIV/0!	2	\$ -
Traf-Mark Industries, LLC	1	0	0	#DIV/0!	1	\$ -
	0	0	0	#DIV/0!	0	\$ -
<b>Total</b>	<b>37</b>	<b>0</b>	<b>6</b>	<b>0%</b>	<b>31</b>	<b>\$ -</b>

cost per participant #DIV/0!

Recruitment Events/Job Fairs/Hiring Events - July 1, 2022 - September 30, 2022

Company / Host Agency	When	Where	Comments
AutoZone Hiring Event	7/19/2022	AJC Huntingdon	
United States Postal Service	7/21/2022	AJC Huntingdon	
MacLean Power Systems Hiring Event	7/21/2022	onsite	
Manpower	7/27/2022	AJC Huntingdon	
MacLean Power Systems Hiring Event	8/10/2022	onsite	
GEON Performance Solutions	8/24/2022	onsite	
MacLean Power Systems Hiring Event	8/31/2022	onsite, Trenton	
Weakley Co Multi-Employer Hiring Event	9/22/2022	Martin Event Center	14 employers represented
McKenzie Area Multi-Employer Hiring Event	9/26/2022	TCAT McKenzie	18 employers represented

Pre-Apprenticeship/Apprenticeships July 1, 2022 - September 30, 2022

Company	When	Details
Trenton Light and Water	8/17/2022	USDOL Registered Electrical Lineman Apprenticeship

Rapid Response July 1, 2022 - September 30, 2022

Company	Comments

Economic Development/Labor Market Information July 1, 2022 - September 30, 2022

EMSI reports produced for:	
	Dana Sealing Products (1)
	Dyersburg State Community College (2)
	Greater Gibson Co Chamber of Commerce (6)
	Greenfield Products / LANCO Group of Companies (2)
	McKenzie Chamber of Commerce (2)
	Obion Co Joint Economic Development Corp (7)
	Parker Hannifin (1)

Presentations and Speaking Engagements - July 1, 2022 - month year

Benton County Industrial Development Board	Benton Co	9/6/2022
College, Career, & Technical Education (CCTE) Directors Meeting	Regional	9/9/2022

Business Service Representatives continuously meet with individual employers and employer related organizations to share services.

Business Service Representatives are providing job placement support for the youth and transitional work experience program.

National Manufacturing Day Events - MFG Day October 7, 2022

### Proposed Policy Revisions – Northwest AJC Committee

All policies placed into NW format with reference to law and related TDLWD Policies. Changed reference to Northwest TN Workforce Board or Southwest TN Workforce Board to Local Workforce Development Board. Changed references for Fiscal Agent/Staff to the Board to Workforce Innovations, Inc.

Policy Name	Changes to NW	Approval Date	Changes to SW	Approval Date	Comments
Co-Enrollment of Customers	<ol style="list-style-type: none"> <li>1. Adds bullet/titles from SW to existing policy.</li> <li>2. Adds language for benefits of co-enrollments;</li> <li>3. Adds section on non-duplication,</li> <li>4. Adds section on funding,</li> <li>5. Adds section auto co-enroll,</li> </ol>	11/15/22	<ol style="list-style-type: none"> <li>1. Identifies core programs</li> <li>2. Removes section on Military Selective Service as this is covered in eligibility policy.</li> <li>3. Removes section on Non-Discrimination as this is covered under grievance/complaint resolution.</li> </ol>	10/27/22	No material changes
Conflict of Interest	<ol style="list-style-type: none"> <li>1. Adds listing of who is considered “workforce members”;</li> <li>2. Adds provision for applicant to be referred to another staff;</li> <li>3. Adds COI for grants;</li> <li>4. Adds when conflict of interest forms are initiated.</li> </ol>	11/15/22	<ol style="list-style-type: none"> <li>1. Eliminates Code of Conduct provision;</li> <li>2. Eliminates Board voting conflict already addressed in by-laws;</li> <li>3. Changes statement on eligibility form for certifying individual and adds statement for applicant/participant;</li> <li>4. defines relative or close personal acquaintance.</li> </ol>	10/27/22	Although this policy affects staff and board members, the changes make it more focused on COI with “participant” or contractors. Other items – staff ethics and board voting should be covered in other documents.
Electronic Case Files	<ol style="list-style-type: none"> <li>1. Adds TDLWD mandate;</li> <li>2. Adds access for audit;</li> <li>3. Adds data validation;</li> <li>4. Adds contact for deleting images;</li> <li>5. Adds citation for records maintenance;</li> <li>6. Adds section on Family Education Rights and Privacy Act.</li> <li>7. Revised timeliness and Accuracy of Reporting;</li> <li>8. Defined timely manner as typically 10 business days.</li> </ol>	11/15/22	<ol style="list-style-type: none"> <li>1. Adds sections on timeliness and accuracy of reporting;</li> <li>2. Adds Personally Identifiable Information;</li> <li>3. Adds Fiscal-related documentation.</li> </ol>	10/27/22	
ITA	1, Eliminates “willing to relocate or commute” per Jennifer.	11/15/22	NOTE: Changes funding of Books and supplies as support services to be included	8/23/22	Significant Difference: Books & supplies are now included in the ITA limit.

	<ol style="list-style-type: none"> <li>1. Removed “year” references to felony and sex offender registration restrictions.</li> <li>2. Removed CNA Job Shadowing.</li> <li>3. Deleted appeal language in Funding Criteria section since addressed in Appeal section.</li> <li>4. Removed “year” reference from appeal section.</li> <li>5. Added language to give LWDB Executive Director authority to waive policy and approve an appeal.</li> </ol>		<p>in the \$4k limit and adds extensive detail from NW policy as follows:</p> <ol style="list-style-type: none"> <li>1. Adds reference to Veteran priority and Priority of Service Policy;</li> <li>2. Limits use of ITA to programs leading to credential in 2 years or less;</li> <li>3. Adds section on using ITA for Registered Apprenticeships, including longer term RAs where interim credential is earned;</li> <li>4. Adds provision for use of out-of-state provider;</li> <li>5. Adds language restricting use of ITA for refresher courses or other training that does not lead to certificate as defined by TEGL10-16, Change 1.</li> <li>6. Adds language that ITA will not be used to re-train in program they already have certificate;</li> <li>7. Adds requirement to apply for Pell and State funding;</li> <li>8. Adds additional language regarding reimbursement if “pell is pending”;</li> <li>9. Adds requirement participant have a plan to pay unmet need above ITA amounts;</li> <li>10. Adds residential or dislocated from employer in area requirement;</li> <li>11. Adds provision that in-demand occupation is determined through use of EMSI and other appropriate documentation;</li> <li>12. Adds provision for completing training program in two years, including those attending 4 year institution must have approximately 60 hours and/or reached junior status to be eligible; includes exception for in-school youth to receive travel for entire 4 years and funds maybe utilized at any point in</li> </ol>	<p>Made changes to restrictions for licensed occupations after talking with Connie, including giving LWDB Ex Dir. authority to waive restrictions for recommended appeal approval from CSP or OSO.</p> <p>The changes add some flexibility, but also provide some restrictions. See list to immediate left.</p>
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			<p>Registered Apprenticeship provided interim credentials are earned.</p> <p>13. Adds provision for half-time enrollment, developmental and remedial classes and summer coursework</p> <p>14. Clarifies continuation of funding with regard to not making satisfactory progress and failing/dropping a class;</p> <p>15. Add provision if attending Pell-eligible institution, participant must complete FAFSA and CANNOT be in default on any federal aid;</p> <p>16. Add criteria for funding licensed occupations including restrictions for felony convictions, DUI convictions, and sex offender registration</p> <p>17. Adds section on Truck Driver Specific Requirement – DOT physical 30 days or less; MVR 10 days or less; no suspension or revoke of drivers license for last 3 years; no reckless or careless driving violations in last 3 years; no more than 3 moving violations in last 3 years, no more than 1 “at fault” accident in last 3 years.</p> <p>18. Adds section on appeal process;</p> <p>19. Adds section requiring use of Needs Assessment and Financial Aid Worksheet (they may have something similar)</p> <p>20. Adds section on refund policy and reduced/increased unmet need, and inaccurate reporting by the financial aid representative.</p> <p>21. Adds provision requiring verification of attending at least one day of registered classes prior to dispersing funds to students and billing for ITA;</p>		
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Initial Assessment	<ol style="list-style-type: none"> <li>1. Adds detail to job search skills section;</li> <li>2. Adds detail to barriers to employment section;</li> <li>3. Adds detail to skills, abilities and interests section.</li> </ol>	11/15/22	<ol style="list-style-type: none"> <li>1. Adds requirement for use of Initial Assessment form to be provided by the One-Stop Operator.</li> <li>2. Adds requirement for uploading assessment into Jobs4TN or case noted.</li> </ol>	10/27/22	No significant change. It is likely SW is already using a form and uploading to jobs4tn.
Supportive Services	<p><i>General</i></p> <ol style="list-style-type: none"> <li>1. Increases “combined maximum” from \$1500 to \$2500</li> <li>2. Clarifies which items are subject to “combined maximum” throughout policy.</li> <li>3. Clarifies required/preferred payment method throughout policy.</li> </ol> <p><i>Supplies, Uniforms, Accommodations &amp; Testing</i></p> <ol style="list-style-type: none"> <li>4. Adds seminars and workshops to allowable payment/fees list.</li> </ol> <p><i>Child Care</i></p> <ol style="list-style-type: none"> <li>5. Adds option of using “trusted caregiver” in addition to licensed facility for child/dependent care, noting that information should be provided on available childcare trainings and licensure options.</li> <li>6. Changes maximum rate from \$100 per week to \$30 per day, subject to increased combined maximum of \$2500</li> <li>7. Adds requirement for documentation of actual cost, including contact info and signature of provider.</li> </ol> <p><i>Transportation Assistance</i></p> <ol style="list-style-type: none"> <li>8. Clarifies transportation assistance is paid based on training provider terms or work schedule upon periodic verification of attendance, with a one-time only payment allowable for work-based training.</li> </ol>	11/15/22	<p><i>General</i></p> <ol style="list-style-type: none"> <li>1. Adds “in the event funds are limited, LWDB Ex. Dir. may limit support service to priority populations only.</li> <li>2. Establishes a “\$2500 combined maximum” lifetime limit for <u>all</u> support services except Transportation Assistance and Needs Related Payments.</li> </ol> <p><i>Supplies, Uniforms, Accommodations &amp; Testing</i></p> <ol style="list-style-type: none"> <li>3. Adds seminars and workshops to allowable payment/fees list.</li> <li>4. Removes 2-year, \$4000 limit for MANDATORY books, supplies, uniforms, drug screens, background checks, etc. currently under support to now be covered under ITA, subject to ITA limitations.</li> <li>5. Removes \$150 limit per term for non-mandatory books, supplies, etc. to now be covered under \$2500 combined maximum limit.</li> <li>6. Adds maximum of \$400 one-time cost of laptops, tables, etc.</li> <li>7. Removes \$1000 limit per year for employment-related costs to now be covered under \$2500 combined maximum limit.</li> </ol> <p><i>Housing, Legal and Medical Services</i></p> <ol style="list-style-type: none"> <li>8. Removes the following annual limits to now be covered under \$2500 combined maximum: Medical - \$1000</li> </ol>		<p>For NW increases “combined maximum” lifetime limit from \$1500 to \$2500.</p> <p>Significant change for SW establishing “\$2500 combined maximum” <u>life-time limit</u> instead of various term/annual monetary limits by individual supportive services.</p> <p>Significant change moving mandatory books, supplies, etc. under ITA limit versus support.</p> <p>Significant changes to child care – expands eligibility over 12; single/actual versus multiple rates; changes from \$2400 <u>annually</u> to \$2500 “combined maximum” lifetime.</p> <p>Significant changes to Transportation – maintaining the use of gas cards; however changing from \$25-\$100 per month to actual mileage at .16.</p>

	<p>9. Changes mileage calculation from .15 to .16 per mile.</p> <p>10. Increases allowable work-based training transportation assistance from first 30 days to first 60 days.</p> <p><i>Other Transportation Related</i></p> <p>11. Adds that auto repairs/parts/support exceeding \$500 must have a minimum of three (3) estimates.</p> <p><i>Needs Related Payment</i></p> <p>12. Adds requirement for documentation supporting attendance in training is required to be uploaded into VOS for Needs related payments.</p>		<p>Utilities - \$500 Rent/Housing - \$750 Phone/Internet - \$250</p> <p><i>Child Care</i></p> <p>9. Adds eligibility for dependent care over age 12 such as disabled, elderly, etc.</p> <p>10. Replaces multiple daily rates (\$34 &lt;2; \$30 2-5; \$20 6-12; \$10 before/after school) with one maximum rate of \$30 per day not to exceed actual cost and subject to \$2500 combined maximum limit</p> <p>11. Emphasizes WIOA is last dollar and requires application/denial from other resources prior to approval.</p> <p>12. Adds requirement to document child/dependent status.</p> <p>13. Adds requirement to complete release of liability for LWDB or CSP regarding participant selection of provider.</p> <p>14. Adds requirement to document actual cost.</p> <p>15. Changes cost limit from \$2400 annually to \$2500 lifetime under the combined maximum for all support except Transportation Assistance and Needs Related Payments.</p> <p><i>Transportation</i></p> <p>16. Maintains a gas card system; however, changes from \$25-\$100 monthly to actual mileage at .16 using NW process.</p> <p>17. Adds provision that OSY who transition from an IS Youth Program and choose a university parallel program may receive support services, including transportation assistance, in order to complete goals established in ISS, regardless of eligibility for ITA.</p>		<p>Also eliminates daily reimbursement option of \$7-\$13 per day.</p> <p>Significant changes to Needs Related payments – eliminates the \$1 per clock hour/\$30 max per week for adults, changing to DW methodology outlined in WIOA. Suspends entire policy due to lack of funding.</p> <p>Will move incentives to Youth Program Design</p>
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			<p>18. Eliminates transportation assistance for job search and limits transportation assistance for work to 60 days.</p> <p><i>Other Transportation Related</i></p> <p>19. Removes the annual limit of \$350 for auto insurance to no be covered under \$2500 combined maximum.</p> <p>20. Adds provision that normal vehicle maintenance is not allowable</p> <p>21. Adds provision if auto repairs are made personally, funds may be requested for parts.</p> <p>22. Adds provision that repairs may not exceed the value of the vehicle.</p> <p>23. Adds provision that case manager should take into consideration the feasibility of public transportation when considering funding for Other Transportation Related</p> <p><i>Needs Related Payments</i></p> <p>24. Requires OSY (18-24) be co-enrolled as Adults or DW to qualify</p> <p>25. Combines payment level methodology for Adults and DW, eliminating \$1 per clock hour present/\$30 max per week.</p> <p>26. Suspends policy due to lack of funding.</p> <p><i>Other</i></p> <p>27. Removes youth tutoring annual limit of \$200 and addresses tutoring as one of 14 Youth elements.</p> <p>28. Moves Incentive Policy from the Support Service policy and includes in Youth Program Design &amp; Incentive Policy.</p>		
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Verifying Identity and Employment Eligibility	<ol style="list-style-type: none"> <li>1. Expanded purpose to include acceptable documentation to support participant eligibility for WIOA programs.</li> <li>2. Added detail on legal right to work in US.</li> <li>3. Clarified difference in verification and documentation</li> <li>4. Added statement that verification, not documentation, is required for registering in Jobs4TN</li> <li>5. Added enrollment “individualized career services, training” to existing employment services requiring documentation.</li> <li>6. Added section services DACA recipients are eligible for.</li> <li>7. Added requirement to document Selective Service for all age-appropriate individuals.</li> </ol>	11/15/22	<ol style="list-style-type: none"> <li>1. Clarifies staff registration of applicants requires verification versus self- registration is considered to self-attest.</li> </ol>	10/27/22	
Work-Based Training	<p>General</p> <ol style="list-style-type: none"> <li>1. Changed reference to spending 10% of allocation on WBT to “significant amount”.</li> <li>2. Eliminated reference to cost \$2500 and serving 100 participants</li> <li>3. Added nepotism clause for supervision</li> <li>4. Added “catch all” statement to comply with all contract provisions.</li> </ol>	11/15/22	General	8/23/22	Moved several sections to make better flow and combined into one policy.
Work-Based Training	<p>Incumbent Worker Training</p> <ol style="list-style-type: none"> <li>1. Added statewide discretionary funding as a source.</li> <li>2. Expanded Employer Eligibility Requirements</li> <li>3. Added section on Delivery of Training Services</li> <li>4. Added section on Employer Match and Qualifying Costs</li> <li>5. Expanded Participant Eligibility</li> </ol>		<p>Incumbent Worker Training</p> <ol style="list-style-type: none"> <li>1. Deleted some detail and added “All grants for IWT will be awarded and operated in accordance with TDLWD policy and WIOA law and regulations.</li> </ol>		Added basic information about ITW that an employer might need to see on the website.

	6. Added ITW Grant Application Process				
Work-Based Training	<p>On-the-Job Training</p> <ol style="list-style-type: none"> <li>1. Added employer may be public, private non-profit, or private for profit.</li> <li>2. Adds the employer will be reimbursed up to 50% "not to exceed the established State wage cap for OJT".</li> <li>3. Adds "The OJT wage rate will be evaluated for appropriate level for self-sufficiency and wage progression prior to entering into the OJT agreement."</li> <li>4. Adds "Employers will be required to agree to all provisions in the WIOA On-the-Job Training Program Employer/Grantee Assurances and other guidance issued by the Grantor."</li> </ol>		<p>On-the Job Training</p> <ol style="list-style-type: none"> <li>1. Eliminates language covered in other sections of work-based training policy.</li> <li>2. Replaces minimum wage rate of \$9.50 per hour with "the OJT wage rate will be evaluated for appropriate level for self-sufficiency and wage progression prior to entering into the OJT agreement".</li> <li>3. Replaces maximum wage rate of \$25 per hour with "not to exceed the established State wage cap for OJT" as the rate changes periodically.</li> <li>4. Adds compliance with WIOA On-the-Job Training Program Employer/Grantee Assurances and other guidance issued by the Grantor."</li> <li>5. Eliminates OJT process with Career Service Provider. (OJT to be coordinated through Staff to Board)</li> <li>6. Eliminates OJT monitoring covered in other section of work-based training policy.</li> </ol>		<p>Got OJT Manual (needs updating per Ginger) so she sent me Assurances. Sent email with my changes to make sure they are correct.</p> <p>Only added reference to NW assurances, incase changes are made to document.</p> <p>Took out SW specifics to wage minimum and maximum....be sure to check language.</p> <p>Our assurances cover all legal matters, but also allow us to do some things like working with staffing agencies.</p>
Work-Based Training	Registered Apprenticeships		<p>Registered Apprenticeships</p> <ol style="list-style-type: none"> <li>1. Adds NW policy in entirety including, definition, ability to provide support services in coordination with RA, selection criteria and language describing pre-apprenticeship programs.</li> </ol>		No current policy on website.
Work-Based Training	<p>Transitional Jobs</p> <ol style="list-style-type: none"> <li>1. Adds clarification "with eligible employers"</li> </ol>		<p>Transitional Jobs</p> <ol style="list-style-type: none"> <li>1. Replaces current policy of 640 subsidized hours with <i>Ready, Set, Hire</i> program component which includes 320 hours subsidized employment and 320 hours OJT.</li> <li>2. Replaces pay of minimum wage to \$12 per hour with the higher of the</li> </ol>		Other than SW #1 changing 640 subsidized hours to 320 subsidized and 320 OJT and #10 changing chronically unemployed from 13 weeks to 27, all other changes should provide better pay and

			<p>starting rate of the position or a minimum of \$8 per hour.</p> <ol style="list-style-type: none"> <li>3. Add LWDB Director may approve beyond 320 hours on a case-by-case basis.</li> <li>4. Adds Indians, Alaska Native, and Native Hawaiians, as such terms are defined in section 166 to barrier eligibility list.</li> <li>5. Adds older individuals to barrier eligibility list.</li> <li>6. Adds eligible migrant and seasonal farmworkers, as defined in section 167(i) too barrier eligibility list.</li> <li>7. Adds individuals within 2 years of exhausting lifetime eligibility under part A of title IV of the Social Security Act to barrier eligibility list.</li> <li>8. Adds Long-term unemployed individuals (27 weeks or longer) to barrier eligibility list.</li> <li>9. Adds Such other groups as the Governor involved determines to have barriers to employment to the barrier eligibility list.</li> <li>10. Changed chronically unemployed or inconsistent work history from unemployed 13 weeks or longer to unemployed 27 weeks or longer.</li> <li>11. Changed chronically unemployed or inconsistent work history from unemployed 26 of past 52 weeks to unemployed for less than 27 weeks, but had at least one period of unemployment for 27 weeks or longer within last 5 years.</li> <li>12. Changed chronically unemployed or inconsistent work history from held 3 or more jobs in past 52 weeks and</li> </ol>		<p>more flexibility of who can be served. There is also a provision to approve extra hours.</p>
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			<p>currently unemployed or underemployed to 3 or more position changes within last 3 years.</p> <p>13. Adds 2 or more significant (10 week or longer) gaps in employment in last 5 years to definition of chronically unemployed or has inconsistent work history.</p> <p>14. Adds 3 or more gaps in employment within the last 3 years to definition of chronically unemployed or has inconsistent work history.</p> <p>15. Adds have been incarcerated withing the last 10 years to definition of chronically unemployed and has inconsistent work history.</p>		
Work-Based Training	<p>Work Experience – Youth</p> <p>1. Adds Participants may work up to 40 hours per week for 6 months, not to exceed 975 hours as designated by the contract/agreement and individual employment plan.</p> <p>Work Experience – Adult &amp; DW</p> <p>1. Adds reference for eligible adults and dislocated workers over age 24 may be served through the Transitional Job component.</p>		<p>Work Experience – Youth</p> <p>1. Changes lowest wage paid to \$8.00 per hour versus minimum wage.</p> <p>2. Changes restriction on hours for in-school youth from 16 hours per week for 12 weeks to up to 40 hours per week for 6 months, not to exceed 975 hours, as designated by the contract/agreement and individual employment plan.</p> <p>3. Adds requirement of academic and occupational education component.</p> <p>4. Adds provision for age 18 to 24 who do not as youth to be receive work experience as adult or dislocated worker.</p> <p>Work Experience – Adult &amp; DW</p> <p>1. Adds reference for eligible adults and dislocated workers over the age of 24 may be served through the Transitional Job component.</p>		<p>Adds more flexibility and higher level of service (wages, hours. Also adds Adult/DW Work Experience for 18-24 who don't qualify for youth.</p>

Work-based Training	Contracts and Agreements 1. Referenced various types of WBT contracts and complying with LWDB, TDLWD and WIOA.		Contracts and Agreements		Provides basic info and leaves details to contract language.
Work-based Training	Monitoring 1. Eliminated percentage and day reference (80% and 180) to CBG example. 2. Added section on sending report to OJT Contract, response and technical assistance requirements.		Monitoring 1. Eliminated reference to 30 days for report and response		Will follow NW monitoring schedule.
Adult and Dislocated Worker Eligibility	Updated Self-Sufficiency Chart	11-15-22	<ol style="list-style-type: none"> <li>1. Adds Adult and Dislocated Worker Eligibility Policy in its entirety in absence of SW policy.</li> <li>2. Establishes residency requirement for Occupational Skills training (live in service area). OJT and IWT are not required since it is an employer service. Those receiving Basic Career Services only are not required to live in service area.</li> <li>3. Requires SSN or application for SSN to apply</li> <li>4. Defines Self-Sufficiency according to NW Board policy (applicant only at 200% of poverty level or LLSIL or family income at 175% or unemployed or low income) which is more flexible than 165% non-metro and 175% metro. There is also concern that certain income (UI, Child Support and SS/SSDI are excluded).</li> <li>5. Updated Self-Sufficiency Chart</li> <li>6. Adds section on income computation with examples.</li> <li>7. Adds list of income excluded from WIOA income computation.</li> </ol>	10/27/22	<p>SW does not have an Adult &amp; DW Eligibility policy online.</p> <p>Adds several items (see list) also by adopting our Self Sufficiency policy eliminates concern of excluding UI, SS, etc.</p> <p>Only change is NW to LWDB in couple of places.</p>

## Co-Enrollment of Customers

**Effective Date:** November 15, 2022

**Duration:** Indefinite

**Purpose:** This policy establishes guidelines for the provision of participant co-enrollment, according to program eligibility, and the Memorandum of Understanding, as a method to provide effective services by combining WIOA core programs and other resources, as appropriate.

**Policy:** WIOA includes the following core programs – Adult, Dislocated Worker, Youth (Title I); Adult Education and Literacy Activities (Title II); Wagner-Peyser (Title III); Vocational Rehabilitation Services (Title V); and Temporary Assistance for Needy Families (TANF). In addition, there are additional resources available through American Job Center (AJC) partnerships. Co-enrollment of participants is necessary in order to leverage funding and provide services, without duplication. By braiding funds between supportive and educational services, a participant receives maximum benefit in proportion to the amount of funds spent, while avoiding duplication or redundancies of services. WIOA programs that target similar demographics should necessitate automatic co-enrollment, when appropriate for the participant.

- **Identification of Eligible Participants** - Individuals entering an AJC will be greeted with a “no wrong door” approach; there is no incorrect entry point for an individual seeking services. During the first step a staff member will conduct a verbal assessment – mainly focused on the individual’s eligibility for WIOA Title I and III programs – that addresses barriers to employment, establishes priority of service, and identifies a disability that requires further resources. Using this assessment, the staff member then offers guidance about the most appropriate next steps.
- **Initial Assessment** - During initial assessments staff are required to ascertain the individual’s long-term employment goal; furthermore, staff must work with the individual to formulate a plan to achieve this goal.
- **Enrollment Process** - The initial assessment and case management will provide the basis for co-enrollment to meet individualized development plans for education, training and/or support service needs. Following the initial assessment, the individual may participate in core programs offered under WIOA or choose to seek staff assistance to establish which programs best fit their needs and eligibility. The strategy for co-enrollment will focus on short-term training to enter or re-enter employment while maintaining sight of how this plan will lead to long-term self-sustainability within the labor market. Ultimately, the goal is to formulate a plan specific to the needs of each individual which can then lead to self-sustaining employment. If it is determined that an individual can benefit from co-enrollment in multiple programs, referral and joint case management should be conducted.
- **Intake Through Technology** - Co-enrollment will normally be facilitated through enrollment in specific activities in the technology-enabled intake and case management system, Virtual One Stop (VOS); however, if the resource is not available to be captured via VOS as an enrollment activity, co-enrollment should be covered in case notes and/or funding agreements.
- **Co-Enrollment Benefits** - Eligible individuals, ages 18 to 24 at registration, may be enrolled in both adult/dislocated worker and youth programs concurrently. This concurrent enrollment will allow an adult/dislocated worker enrollee to also receive specific services as outlined in the fourteen basic elements of the youth program. Also, WIOA programs targeting similar demographics may necessitate co-enrollment (EXAMPLE: Reemployment Services and Eligibility Assessments (RESEA) may be co-enrolled with dislocated worker program). Other programs where co-enrollment may benefit an individual include Supplemental Nutrition Assistance Program Employment & Training (SNAP E & T), TRADE, Temporary Assistance for Needy Families (TANF), and Adult Education (AE).
- **Non-Duplication of Services** – In order to prevent duplication of services, a referral process will be utilized in the LWDA. Also, open communication with partner staff of other programs an individual may be eligible for, will be maintained to determine which partner will pay for services needed.

- Funding - Coordinated funding for ITAs will be utilized to maximize services for an individual enrolled in more than one program. In order to ensure that funding received by an individual under a specific program is appropriate, monitoring will be conducted by both board staff and service delivery staff to ensure the cost is allowed under that program.
- Automatic Co-Enrollment - WIOA programs that target similar demographics should necessitate automatic co-enrollment when beneficial to the participant. One such example is Reemployment Services and Eligibility Assessments (RESEA), and dislocated worker programs. Other programs that may be paired could include Supplemental Nutrition Assistance Program Employment and Training (SNAP E &T), TRADE, Temporary Assistance for Needy Families (TANF), Adult Education (AE), Dislocated Worker Programs and Youth Programs.

The One-Stop Operator is responsible for providing specific procedures for co-enrollment between all partners.

**Reference:** 20 CFR 679.560(b)(2)(ii); WIOA Section 108(b)(21)

**Related TDLWD Policy:** Co-Enrollment of AJC Customers Policy (pages 3 and 5)

**Vetted and Approved by the ~~Northwest Tennessee~~ Local Workforce Development Board:** November 15, 2022

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Jimmy Williamson, Chairman  
Northwest Tennessee Workforce Board



## Conflict of Interest (Service Delivery)

**Effective Date:** November 15, 2022

**Duration:** Indefinite

**Purpose:** To ensure that individuals or representatives of organizations entrusted with public funds will not personally or professionally benefit from the award or expenditure of such funds. This policy is established to provide direction for sub-recipients, contractors, staff and board members of ~~the LWDA~~ ~~12 Northwest TN Workforce Board~~ to prevent actual, potential or questionable conflicts of interest. The ~~NW TNWB~~ LWDA shall also ensure training concerning internal conflicts of interest for any entities directly involved with making assessments and determining the eligibility of participants. Documentation of training must be maintained and made available for review and audit purposes.

**Policy:** The following entities will not provide direct service during the intake or eligibility determination of a family member or close acquaintance. No workforce staff or member will have a personal or business relationship with, or a positive bias for, or a special interest in, that particular applicant. Such workforce members are:

- Local Workforce Development Board members
- Local Workforce Development Board subcommittee members
- Chief Local Elected Officials
- WIOA executive staff and supervisors
- WIOA employees
- AJC partner staff
- WIOA sub-recipients and/or contractors

The Workforce Innovation and Opportunity Act (WIOA) eligibility/intake forms must include the following disclosure statement for the customer and the certifying individual to sign:

Customer - My signature is a declaration that I am not related to, nor have a close personal acquaintance to the workforce staff member (Local elected officials, LWDB members, LWDB subcommittee members, WIOA executive staff and supervisor, WIOA employees, job center partner staff and WIOA sub-recipients and / or contractors) determining my eligibility for Workforce Innovation and Opportunity Act funding.

Certifying Individual - I understand my signature on this form is a declaration that I am a member of workforce staff (Local elected officials, LWDB members, LWDB subcommittee members, WIOA executive staff and supervisor, WIOA employees, job center partner staff and WIOA sub-recipients and/or contractors) and the customer I am determining eligibility and /or services for is not a relative or close personal acquaintance.

For the purpose of this policy, relative will be considered a parent, parent-in-law, child, spouse, brother, foster brother, sister, foster sister, grandparent, grandchild, son-in-law, brother-in-law, daughter-in-law, sister-in-law, 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.

This policy does not prohibit the applicant from receiving services for which they are eligible. Should an applicant be related to, or a close personal acquaintance of, a workforce member staff, the applicant shall be referred to another ~~staff person~~ in the area for determination of eligibility, enrollment, services, and case management.

Further, any grant recipient or sub-recipient receiving WIOA funds through the LWDB shall ensure that no individual in a decision-making capacity engages in any activity if a conflict of interest is involved, even in perception of impropriety of a conflict of interest. This includes decision-making that involves the selection, awarding, or administering of a grant, sub-grant or contract by WIOA funds.

Conflict of interest forms will be signed and returned to staff annually each year, or as a new board/committee member/staff/contractor becomes part of the Workforce System in the Local Workforce Development Area. Signed copies of the Conflict of Interest will be kept on file in the LWDB office.

**Reference:** Title I of WIOA, Pub. L. 113-128; WIOA Section 107(c)(3)(A)(i); 20 CFR 683.400(c); 20 CFR 679.430; 20 CFR 679.410(a)(3) and 20 CFR 679.410(c); 20CFR 684.630(b)-(c); 29 CFR 97.36(b)(3); 20 CFR 683.200(c)(5)(i-iii) reference to 2 CFR 200.318.

**Related TDLWD Policy:** Workforce Services Policy – Conflict of Interest TN-WIOA (17-2)

**Vetted and Approved by the ~~Northwest Tennessee~~ Local Workforce Development Board:** November 15, 2022

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Jimmy Williamson, Chairman  
Northwest Tennessee Workforce Board

## Electronic Case Files

**Effective Date:** November 15, 2022

**Duration:** Indefinite

**Purpose:** To provide guidance regarding maintenance of records for a period of five (5) years and utilization of electronic records to reduce/keep paperwork to a minimum. (TDLWD effective 11-30-17). This guidance also includes instructions to protect customer information.

**Policy:** The Tennessee Department of Labor and Workforce Development (TDLWD) mandated that all WIOA record keeping be transitioned to a paperless system by using an electronic document imaging and storage system effective November 30, 2017. TDLWD revised the documentation process for determining eligibility and the maintenance of pertinent records by electing to utilize electronic documents and requiring electronic verification of eligibility requirements. Jobs4TN allows both internal and external access to provide all servicing partners the means to efficiently administer services to their participants.

The Jobs4TN electronic record system must be utilized whenever possible to maintain all participant records, including:

- creating participant applications,
- recording provided services,
- uploading supporting documentation to verify eligibility, and
- providing case notes regarding interaction with participants including the ‘who, what, when, where, why, and how’ of service delivery.

All forms currently used during an individual’s registration within an American Job Center, specifically following the initial assessment, will be replaced by the use of Jobs4TN, whenever possible. All documents, with the exception of medical records containing protected health information (PHI) under the HIPAA Act of 1996, are required to be uploaded into VOS to validate data entered.

**Exception:** Medical records, including any records containing identifiable health information—also known as protected health information (PHI) under the HIPAA Act of 1996—such as health status, provision of health care, or payment for health care, must be maintained in a secure area and in paper format.

**Access for Monitoring/Auditing:** Electronic information will be made available to any US Department of Labor or State auditor or monitor who need access in order to carry out their official duties by granting full access to the Virtual One-Stop (VOS) system or in paper format if requested.

**Data Validation:** The State has established procedures, consistent with the guidelines issued by the Secretaries of Labor and Education, to ensure information contained in WIOA federal reports is valid and reliable. Data Element Validation (DEV) is conducted annually by a review of a sample of participant records chosen from the federal report. Staff from TDLWD validate that each participant record reviewed denotes accurate information and supporting documentation. Data validation is conducted to make sure participant files are accurate and in compliance. All required documentation for data element validation shall be uploaded into the VOS system.

**Deleting Images:** No images may be deleted from VOS without permission granted by the TDLWD, and only by the TDLWD Policy and Compliance Unit. Should an image need to be deleted, staff should contact the LWDB Director of Performance and Compliance and a request will be submitted to the State.

Records Maintenance: All records, electronic and paper, necessary to prepare reports and permit tracing of funds, must be maintained for five (5) years per TDLWD pursuant to Records Disposition Authorizations (RDAs) 1586 and 2207 from the State of Tennessee Comptroller of the Treasury (3 years prior to 11-30-17).

Confidentiality of Records and Release Forms: Data or information acquired for statistical purposes, shall not be disclosed in identifiable form for any other use, except with the informed consent of the respondent per Public Law 107-347 Title V Section 512(b)(1). Release forms, including release of educational records in compliance with the Family Educational Rights and Privacy Act (see below), should be signed and dated by the participant and case manager and uploaded into VOS. This form must state that the participant's information may be used for reporting purposes as a result of federal regulations associated with the benefit of federal funds, and that the participant's personal information will remain confidential. This may be used as a stand-alone form or may be incorporated into other release forms used. The release form must be uploaded into the participant file in Jobs4TN to validate that the participant agrees to the release of information for reporting purposes.

Federal law, enacted in 1974, under the Family Educational Rights and Privacy Act protects the privacy of student education records. Student's education records may not be disclosed without the parent or student's prior written consent, unless (34 CFR 99.31):

- The disclosure is to other school officials, including teachers, within the agency or institution whom the agency or institution has determined to have legitimate educational interests
- A contractor, consultant, volunteer, or other party to whom an agency or institution has outsourced institutional services or functions may be considered a school official under this paragraph provided that the outside party
  - Performs an institutional service or function for which the agency or institution would otherwise use employees;
  - Is under the direct control of the agency or institution with respect to the use and maintenance of education records; and
  - Is subject to the requirements of Section 99.33(a) governing the use and re-disclosure of personally identifiable information from education records.
- An educational agency or institution must use reasonable methods to ensure that school officials obtain access to only those education records in which they have legitimate educational interests. An educational agency or institution that does not use physical or technological access controls must ensure that its administrative policy for controlling access to education records is effective and that it remains in compliance with the legitimate educational interest requirement of this section.
- The disclosure is, subject to the requirements of Section 99.34, to officials of another school, school system, or institution of postsecondary education where the student seeks or intends to enroll, or where the student is already enrolled so long as the disclosure is for purposes related to the student's enrollment or transfer.

Participants who attend training through WIOA-funded programs must also sign and date a form authorizing the release of educational records in order to obtain information or copies of certifications or diplomas from educational institutions for data validation and reporting purposes.

Legal Status of Electronic Documents: In accordance with Public Law 105-277 Title XVII Section 1707, electronic records submitted or maintained in accordance with procedures developed under this title, or electronic signatures or other forms of electronic authentication, shall not be denied legal effect, validity, or enforceability because such records are in electronic form.

Timeliness and Accuracy of Reporting: All applicants must be processed immediately upon a customer receiving services. However, there are allowable exceptions-such as Rapid Response. In such instances the maximum allowable time to enter information into Jobs4TN is ten (10) business days. Any exception requires advance

written approval of the LWDB Director of Performance and Compliance. ~~Furthermore, Otherwise,~~ all eligibility intake information and documentation must be **immediately** uploaded into Jobs4TN upon receipt. This **immediate action** also applies to the exiting of participants once they have completed all programs and are no longer receiving services (including documentation to support credentials or employment, when applicable). Once participants have exited programs, follow-up procedures and documentation concerning these individuals must be entered into Jobs4TN in a timely manner, **typically within 10 business days**. TDLWD will not entertain any exceptions to this mandate. Service providers are expected to enter all verification documents, **immediately** upon receipt, into Jobs4TN for all active and exited participants using the naming conventions provided in Workforce Services Policy – Electronic Case Files. **All documentation and case notes input into Jobs4TN.gov are expected to be true and accurate.**

Personally Identifiable Information (PII) - PII is defined as either protective or non-sensitive. Protective PII is information that is sensitive and typically includes information such as a social security number, date of birth, or bank account numbers. Non-sensitive information is personal information that, when released by itself, should not be harmful to the individual. Non-sensitive information typically includes first and last name, email addresses, and business address. The handling of PII should be done with caution and follow federal guidance.

Fiscal-Related Documentation - The Fiscal Agent maintains records of participant related payments and is not required to upload invoicing documentation into the Jobs4TN system, as Jobs4TN is not intended to be the system of record for fiscal documentation. All participant-related payments must be linked to their corresponding payments in the Fiscal Agent's fiscal accounting system by notating the invoice number or other specific identifier within the voucher payment in the Jobs4TN. This allows for ease of reference during monitoring and review.

**Reference:** 20 CFR 37.39; WIOA Section 308(c)(2)(F)(ii); TEGL 39-11

**Related TDLWD Policy:** Electronic Case Files Policy

**Vetted and Approved by the ~~Northwest Tennessee Local Workforce Development~~ Board:** November 15, 2022

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Jimmy Williamson, Chair  
Northwest Tennessee Workforce Board

## Individual Training Account

**Effective Date:** November 15, 2022

**Duration:** Indefinite

**Purpose:** To establish a policy for use of Individual Training Accounts (ITAs) for in-demand occupations.

**Policy:** An Individual Training Account (ITA) voucher may be available to provide funding for WIOA eligible adults, dislocated workers and out of school youth, observing Priority of Service policies, who have completed an assessment and been determined to need in-demand occupational skills training to become gainfully employed. An ITA may be provided if the State Workforce Agency (SWA) or one-stop center staff determine, after an interview, evaluation or assessment, and career planning, that the eligible individual is:

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

Training services must be linked to in-demand employment opportunities in the local area or planning region or in a geographic area in which the individual is willing to commute or relocate. The selection of training services should be conducted in a manner that maximizes customer choice, is linked to in-demand occupations, informed by the performance of relevant training providers, and coordinated to the extent possible with other sources of assistance.

Per TEGL 19-16, Section 134(c)(3)(E) of WIOA, with respect to funds allocated to a local area for Adult employment and training activities, priority must be given to recipients of public assistance, other low income individuals, and individuals who are basic skills deficient for receipt of Individualized Career Services and Training Services. Also per TEGL 19-16, Veterans and eligible spouses continue to receive priority of service for all DOL-funded job training programs, which include WIOA programs. However, as described in TEGL 10-09, when programs are statutorily required to provide priority for a particular group of individuals, such as the WIOA priority described above, priority must be provided in the manner described in the Priority of Service Policy.

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

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

ITA funding is for unmet need for cost of training not covered by other federal or State financial aid, such as Pell, Lottery, TN Promise, and TN Reconnect. WIOA funds are considered "last dollar." ITA funding is authorized per training term (quarter, semester, trimester, etc.), with subsequent terms authorized after successful completion

of the previous term. The ITA is limited to \$4,000 per year, for two years, with total cost limited to \$8,000 during participation in the WIOA program. ~~(approved effective 11/27/18; previously limited to \$3,000/year, \$6,000 maximum as of 11-13-12)~~ The One-Stop Operator may file an appeal with the ~~NW/TNWB~~ LWDB Executive Director for additional time/funding for the participant for extenuating circumstances that prohibit successful completion.

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

### ***Funding Criteria for ITAs***

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

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

1. Is the program of study selected on the Eligible Training Provider List (ETPL)? Has the program been approved by the local board? Anyone seeking training Out-of-State must document that the Out-of-State provider and program is listed on the eligible training provider list of the state in which it is located **and that the state has a reciprocal agreement in place with the Tennessee Department of Labor and Workforce Development.**
2. Does the program lead to a certificate as defined in TEGl 10-16, Change 1, issued on August 23, 2017? It is the policy of our Local Board to not use local WIOA training funds for refresher courses or other training which does not lead to a certificate as defined in TEGl 10-16, Change 1. Although some of these types of training may be listed on the ETPL, **the** Local Board has elected to not use WIOA Title I training funds for these types of programs. ~~We are not to use training funds or~~ to re-train a person in a program for which they already possess the certificate.

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

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

Note: A participant may enroll in WIOA-funded training while his/her application for a Pell grant is pending. This enrollment is permitted as long as the Career Service Provider (CSP) has made arrangements with the training provider and the WIOA participant regarding allocation of the Pell grant if it is subsequently



awarded. In that case, the training provider must reimburse the CSP all WIOA funds used to underwrite the training for the amount that the Pell grant covers (WIOA Section 134(c)(3)(B(ii))). Reimbursement is not required from the portion of Pell grant assistance disbursed to the participant for education-related expenses.

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

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

#### *For New Participants Only*

1. Potential participants must be residents of, or dislocated from an employer located in, a county located within the local service area.
2. Potential participants must register in Jobs4TN or update an existing account.
3. Potential participants must complete all steps of the assessment and enrollment.
4. Potential participants must be currently enrolled, or accepted into, an institution and training program that is listed on the Eligible Training Provider List. The Career Advisor will use the eligible training provider list for the state in which the institution is located.
5. The training program must be linked to an in-demand occupation as determined by the Career Advisor through the use of the EMSI system or other documentation as appropriate.
6. For training programs leading to a career in an occupation requiring licensure, participants must meet the criteria outlined in the Licensed Occupations Eligibility section of this policy.
7. Potential participants must be able to complete the training program within two years. For those attending four-year institutions, they must have earned approximately 60 credit hours and / or reached junior status in order to be eligible for funding.

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

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

#### *For New and Current Participants*

1. Participants must meet at least half-time enrollment criteria according to the institution and program. Up to half of participants' credit hours may be for developmental / remedial classes.  
 Note: For institutions / programs that do not require coursework for the summer term, a participant may still choose to take courses during this time. Participants who choose to take classes during the summer term can take any number of credit hours as long as they are still following their plan of action to graduate, and as long as they still have ITA money available.
2. Participants must be in good academic standing and maintain satisfactory progress according to the institution's policy. If the participant falls below good standing, they must return to school without funding until they get back in good standing. Once they return to good standing status, the career advisor may apply funding again.

3. Participants may only receive funding once. If participants fail, or drop out of a class that has been paid for by an ITA, they must retake the class on their own, without funding, including travel.
4. Participants who drop a class, without approval from their Career Advisor, must successfully complete the next term on their own, including travel, before they can receive funding again.
5. Participants attending Pell-eligible training institutions must complete the FAFSA and CANNOT be in default on any federal financial aid (i.e. Pell grants).

### ***Funding Criteria for Licensed Occupations***

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

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

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

### ***Truck Driving Specific Requirements***

1. The applicant must supply a valid Medical Examiner's Certificate of a DOT Physical (currently valid for a maximum of two years) and proof of drug screen, performed no more than thirty (30) days prior to date of WIOA eligibility.
2. The applicant must supply a copy of a Motor Vehicle Report (MVR) that is no more than ten (10) days prior to the date of WIOA eligibility.
3. Driver's license must not have been suspended or revoked in the last three (3) years.
4. No reckless or careless driving violation within the last three (3) years.
5. No more than three (3) moving violations in the last three (3) years.
6. No more than one (1) "at fault" accidents in the last three (3) years.

### ***~~Certified Nurse Assistant/ Patient Care Technician~~***

~~All applicants who want to attend Certified Nurse Assistant Training or the Patient Care Technician program will have completed 8 hours of job shadowing and orientation scheduled by the training provider to make sure he/she has a clear understanding of the responsibilities of employment and will be successful in the position.~~

### ***Appeal Process***

#### **When to File an Appeal**

1. If an individual is denied funding for training because a staff person determines that an individual is not in need of training due to the individual being marketable, able to work in the field, and the expected wages per EMSI are enough for the person and his / her family to be self-sufficient, then the individual may choose to file an appeal.
2. If the customer ~~has a felony over 5 years old and intends~~ is ineligible to attend a training program for an occupation which requires a license, such as a truck driver, nurse, or teacher, **due to restrictions in the**

**Funding Criteria for Licensed Occupations and/or Truck Driver Specific Restrictions**, the customer ~~must~~ may choose to file an appeal.

### **Process to File an Appeal**

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

### **Payment of ITAs & Refund Policy**

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

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

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

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

### **Exceptions to the Use of ITAs**

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

1. The services provided are OJT, customized training, incumbent worker training, or transitional jobs;

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

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

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

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

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

**Vetted and Approved by the ~~Northwest-Tennessee Local~~ Workforce Development Board:** November 15, 2022

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Jimmy Williamson, Chair  
Northwest Tennessee Workforce Board

## Initial Assessment

**Effective Date:** November 15, 2022

**Duration:** Indefinite

**Purpose:** To establish guidance for effective initial assessment of American Job Center job seeker customer.

**Policy:** All individuals seeking American Job Center services, beyond self-service, are required to have an initial assessment. An initial assessment identifies a participant's knowledge, skills, abilities, and barriers to employment in support of an employment goal. A thorough initial assessment will provide sufficient information about the participant's current situation which staff will use to create a service plan, including making appropriate referrals to partners and service providers. The initial assessment will include, at a minimum, the determination of:

1. If the participant is job ready or not
2. Participant's job search skills: ~~and~~
  - a. Is customer comfortable using a computer?
  - b. Does customer have an updated resume?
  - c. Can customer conduct on-line job searches and fill out job applications on-line?
  - d. Does customer feel comfortable when interviewing for a job?
3. Any barriers to employment the participant may have:
  - a. Does customer have any health or physical impairments?
  - b. Are legal issues causing problems for customer?
  - c. Is adequate transportation available to customer?
  - d. Does customer need childcare?
4. Participant's skills, abilities, and interests:
  - a. Does customer have necessary education and training to compete in the job market?
  - b. What is the customer's past work history?
  - c. Does the participant have in-demand occupational skills?
  - d. Are any transferable skills listed?
5. Participant's goals – employment and/or pursuit of training or education
6. Analysis of the participant's occupational goal to determine whether it is favorable or unfavorable in the labor market (if the participant does not have a clear occupational goal, or if the participant's outlook for an occupational goal is unfavorable, then the participant is identified for career development services)
7. Next steps, which may include comprehensive assessments and development of an individual employment plan
8. Appropriate referrals to partner agencies for education, training and supportive service needs
9. The need for co-enrollment in multiple programs

The initial assessment should be conducted as a part of the welcome function on the day a participant receives their first service from staff. All AJC participants should receive an initial assessment, utilizing the ~~Evaluation of Service Need~~ form ~~provided by the One-Stop Operator~~, unless the staff member determines that it is appropriate to use a recent interview, evaluation or assessment of the participant conducted pursuant to another education or training program. Assessments should be uploaded into the participant's Jobs4TN file if possible, or case noted when a paper assessment is not utilized.

The One-Stop Operator will ensure that all partner programs and staff in the American Job Center adhere to the initial assessment policy/process. The One-Stop Operator will provide partners with an ~~Evaluation of Service~~ **Need Initial Assessment** Form and may update as needed to meet customer-centered service design.

**Reference:** WIOA Section 129(c)(1)(A); WIOA Section 124 (c)(2)(A)(iii)

**Related TDLWD Policy:** AJC Initial Assessment Guidance (pages 2-3 and 4)

**Vetted and Approved by the** ~~Northwest Tennessee Local Workforce Development~~ **Board:** November 15, 2022

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Jimmy Williamson, Chairman  
Northwest Tennessee Workforce Board

## Supportive Services

**Effective Date:** November 15, 2022

**Duration:** Indefinite

**Purpose:** To provide policy for providing supportive services for eligible participants.

**Policy:** As defined in the WIOA, Supportive Services means services such as transportation, childcare, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under the act. The ~~Northwest TN Workforce Board~~ Local Workforce Development Board (LWDB), through the regional planning process and in compliance with TDLWD policy, recognizes that Supportive Services are limited and must be leveraged with other local and state resources. **Supportive services should only be provided when the services are not available elsewhere, since WIOA is considered funding of last resort.** Funds allocated to a local area (WIOA Section 133) may be used to provide supportive services to Adults and Dislocated Workers who:

- (1) Are participating in programs with activities authorized in WIOA Section 134(c)(1)(A)(ii) or WIOA Section 134(c)(1)(A)(iii);
- (2) Have exited and need post-program support services as follow-up (for up to 12 months after exit); and
- (3) Are unable to obtain such supportive services through other programs providing such services.

Supportive services for youth, as defined in WIOA Section 3(59), are services that enable an individual to participate in WIOA activities. Participants in WIOA programs who face significant barriers to employment, such as recipients of public assistance, low-income individuals, or individuals who are basic skills deficient, should be given service according to their level of need.

**Supportive Services are not entitlements and must be supported by demonstration of financial need.** The participant's need for services will be documented in the case file ~~and~~ and participants enrolled in individualized career or training services ~~and~~ must demonstrate need in the Individual Employment Plan or Individual Service Strategy. When multiple options are available for receiving supportive services, documentation must show a reasonable effort was made to determine and choose the lowest, competitively priced service available. Support services activities and supporting case notes will be entered into VOS by AJC staff. In the event that funds are limited, the LWDB Executive Director may limit one or more of the Supportive Services to priority populations only.

### Allowable Support Services

According to 20 CFR § 680.900 and § 681.570, Supportive Services for Adults, Dislocated Workers, and Youth may include, but are not limited to, the following:

- (a) Linkages to community services;
- (b) Assistance with transportation;
- (c) Assistance with child care and dependent care;
- (d) Assistance with housing;
- (e) Needs-related payments, as described at §§ 680.930, 680.940, 680.950, 680.960, and 680.970;
- (f) Assistance with educational testing;
- (g) Reasonable accommodations for individuals with disabilities;
- (h) Legal aid services;
- (i) Referrals to health care;
- (j) Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear;
- (k) Assistance with books, fees, school supplies, and other necessary items for students enrolled in secondary or postsecondary education classes; and
- (l) Payments and fees for employment and training-related applications, tests, **seminars, workshops,** and certifications.

The allowable support services as described ~~below~~ above will be made available in the following manners:



**Referral and Coordination**

The One-Stop Operator and Service Provider(s) shall ensure procedures are in place to coordinate support services through linkages to community services and through partner referral to avoid duplication and ensure Title I funds are last-dollar and are only used to provide supportive services when the services / funds are not available elsewhere.

**Payments on Behalf of / to Participants**

The following support services will be paid on behalf of the participant, directly to the service provider, unless otherwise noted. As noted below, in certain cases (e.g. Child or Dependent Care or Housing, Legal, and Medical Services) payments must be made directly to the participant as a reimbursement. If the participant has a support service need but cannot afford to make the payment to be reimbursed, the Career Service Provider may submit a request to the One-Stop Operator who will submit it for approval by the ~~Northwest TN Workforce Board~~ LWDB Executive Director for payments to be made directly to the participant as an advance. Participants must complete a written request and sign an agreement stating that the funds will only be used for the identified purpose and that receipts of purchases / services obtained must be provided by the participant and maintained by staff. The agreement must also acknowledge that failure to provide appropriate receipts / documentation will result in all funding being suspended for the participant until such documentation is provided. The agreement must be maintained by staff and the purpose of the payment and the approval must be documented in case notes. Duration, unless otherwise noted, is limited to approved terms of participation in programs with activities authorized in WIOA Section 134(c)(1)(A)(ii) or WIOA Section 134(c)(1)(A)(iii); or have exited and need post-program support services as follow-up (i.e. support services for occupational skill training would be limited to up to two years). **Amounts are limited to actual cost, subject to a combined \$2,500 maximum, unless other limitations are set out in this policy.** Documentation of support service costs, issued by the training provider and / or vendor, must be maintained in the participant's case file.

**Supplies, Uniforms, Accommodations, and Testing**

**\*\*Payments for these supportive services should be made to the vendor, preferably, or to the participant as a reimbursement, unless otherwise approved. This category is subject to the combined maximum support service limitation of \$2,500, except all MANDATORY books, supplies, uniforms, drug screens, background checks, etc. for training with a provider on the Eligible Training Provider List (ETPL) will be covered as a part of the Individual Training Account (ITA) and subject to ITA limitations.**

- assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear needed to be successful in occupational skills training **and work-based training such as** on-the-job training, transitional jobs, pre-vocational services, or work experience activities;
- assistance with **non-mandatory** books, fees, school supplies, and other necessary items, such as drug screens and background checks, ~~for students enrolled in secondary or postsecondary education classes, subject to the maximum ITA amount for required postsecondary, and up to the \$1,500 combined maximum for~~ and other basic supplies that are not mandatory but may be necessary such as laptops, tablets, calculators, backpacks, printing / copying fees, and parking passes;
  - Laptops, tablets, or other similar items identified as a needed tool/supply for a participant to successfully take part in WIOA activities, may be purchased one time at a cost of no more than \$400.
- assistance with educational testing;
- payments and fees for employment and training-related applications, tests, **seminars, workshops,** and certifications.
- Reasonable accommodations for individuals with disabilities.

**Housing, Legal, and Medical Services**

**\*\*Payments for these supportive services must be made to the participant as a reimbursement, unless otherwise approved. Subject to the combined support service limitation of \$2,500.**



- Assistance with housing, excluding rental deposits or mortgage payments, to allow participants to maintain or obtain adequate or temporary shelter, and related costs such as utilities and / or phone / internet plans, when an emergency arises while actively participating in career or training activities which would prevent the continuation of their attendance. The purpose of the funds must be documented and payments made to the participant require a copy of the bill or receipt listing the participant as the debtor attached to the authorization. Rent payments will require a copy of a lease agreement naming the participant.
- Legal aid services;
- Medical / health care and counseling services such as required immunizations, dental services, ophthalmologist services, eyeglasses, hearing aids, drug and alcohol counseling, mental health counseling, behavioral counseling, etc.

#### *Assistance with Child and / or Dependent Care*

***\*\*Payments for these supportive services must be made to the participant as a reimbursement, unless otherwise approved. Subject to the combined support service limitation of \$2,500.***

Assistance with childcare for children under the age of 12 and dependent care for children over the age of 12 who have a disability, elderly parents, etc., may be utilized to help a participant meet their family care needs during WIOA Title I program participation. Child and dependent care services must be provided by a licensed facility ~~or a trusted caregiver and~~ selected by the participant. ~~Participants utilizing trusted caregivers will be encouraged to provide caregivers with information on available childcare training and licensure options.~~ Services will be payable at a maximum rate of ~~\$1030~~ per child / dependent per ~~day week~~, not to exceed actual cost, up to the **\$21,500** combined maximum. Since supportive services must only be provided as last-dollar funds, participants who appear to possibly meet requirements for other childcare or dependent care services, such as those available through the Department of Human Services, Headstart, school district pre-k programs, TennCare Choices, etc., must first make application to those programs and provide proof of denial prior to being approved for Title I child or dependent care services. Participants must provide documentation of child / dependent status, such as a birth certificate, guardianship documents, etc. and must complete a release stating that the parent / caregiver is the one deciding on their child / dependent care provider and that the LWDB and Career Service Provider are not liable for issues that may arise. ~~Documentation of actual costs of child and / or dependent care from the provider, to include provider contact information and signature, must be submitted prior to reimbursement to the participants.~~

#### *Transportation Assistance*

***\*\*Payments for these supportive services must be made to the participant via a gas / loadable card, unless otherwise approved. This category is paid in addition to the combined maximum support service limitation.***

The LWDA will provide transportation assistance for an eligible WIOA participant attending an LWDA approved training provider and program for occupational skills training ~~or~~ to the worksite for the first ~~360~~ days of employment. The transportation assistance will be paid through a stipend payment paid at intervals consistent with the training provider terms or ~~work schedule and upon periodic verification of attendance~~. A one-time only payment for work-based training ~~experience may be made~~. Out of School Youth who transitioned from an In-School Youth Program and choose a University Parallel program of study may receive support services, including transportation assistance, in order to complete the goals established in the individual service strategy. Subsequent ITA funding will require the participant, program and provider to meet all local/state criteria.

The payment will be based on exact costs calculated at a rate of ~~\$165~~ per mile one-way unit per day, converted to roundtrip (not subject to the **\$21,500** maximum). Participants receiving transportation assistance from another organization (i.e. Workforce Essentials, TAA) are not eligible to receive a full transportation stipend from WIOA. As last dollar funds, all other programs must pay first before WIOA funds can be authorized. In the event that a participant is receiving travel funding from another program, the total amount anticipated to be received in transportation assistance from the other agency must be deducted from the transportation assistance amount WIOA expects to pay.

To be eligible for this stipend, one must be in good standing and making satisfactory progress, must not drop or be removed from a course without notifying and providing needed information to the WIOA staff member regarding this action, etc.

Participants may receive a travel stipend for the first 360 days of a **work-based training, such as a** transitional job or work experience activity to offset their gas expenses until they have received ~~one~~ **two months'** of pay, at which time, they should have been able to budget money out of their paychecks to pay for their own gas expenses. In the event a transitional job or work experience position requires the participant to travel, the travel stipend may be extended through the duration of the work experience or transitional job **subject to LWDB Executive Director or his/her designee approval.**

#### **Other Transportation-Related Assistance**

**\*\*Payments for these supportive services should be made to the vendor, preferably, or to the participant as a reimbursement, unless otherwise approved. This category is subject to the combined maximum support service limitation of \$2,500.**

Additionally, required auto repair, insurance, and / or driver license fee payments may be made, subject to the combined **\$21,500** maximum, in response to an immediate need, in order to allow a participant to continue to participate in employment and training activities. Normal vehicle maintenance costs are not allowed. If a participant is personally repairing his / her personal vehicle, funds may be used to purchase the parts. Auto repair may not exceed the value of the vehicle **and any repair/parts/support exceeding \$500 must have a minimum of three (3) estimates.** Staff should take into consideration if public transportation would be a more feasible option for the participant.

#### **Needs-Related Payments (currently suspended due to funding limitations)**

**\*\*This category is paid in addition to the combined maximum support service limitation.**

Needs-related payments provide financial assistance to participants for the purpose of enabling them to participate in training and are a supportive service authorized by WIOA sec. 134(d)(3). Unlike other supportive services, in order to qualify for needs-related payments a participant must be enrolled in training. Needs-related payments may be paid while a participant is waiting to start training classes if the participant has been accepted in a training program that will begin within 30 calendar days. The Governor may authorize local areas to extend the 30-day period to address appropriate circumstances.

Eligibility Criteria in order to be eligible for needs-related payments:

Adults must:

- (a) Be unemployed;
- (b) Not qualify for, or have ceased qualifying for, unemployment compensation; and
- (c) Be enrolled in a program of training services under WIOA sec. 134(c)(3).

Dislocated Workers must:

- (a) Be unemployed, and:
  - (1) Have ceased to qualify for unemployment compensation or trade readjustment allowance under TAA; and
  - (2) Be enrolled in a program of training services under WIOA sec. 134(c)(3) by the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated worker, or, if later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months; or
- (b) Be unemployed and did not qualify for unemployment compensation or trade readjustment assistance under TAA and be enrolled in a program of training services under WIOA sec. 134(c)(3).

Youth must:

- (a) be co-enrolled into either the Adult or Dislocated Worker programs to qualify for Needs-Related Payments.

Documentation of all eligibility criteria is required and must be maintained in the participant's case file.

**Level of Needs-Related Payments**

Per § 680.970, the level of needs-related payments is determined as follows:

- (a) The payment level for Adults must be established by the Local WDB.
- (b) For Dislocated Workers, payments must not exceed the greater of either of the following levels:
  - (1) The applicable weekly level of the unemployment compensation benefit, for participants who were eligible for unemployment compensation as a result of the qualifying dislocation; or
  - (2) The poverty level for an equivalent period, for participants who did not qualify for unemployment compensation as a result of the qualifying layoff. The weekly payment level must be adjusted to reflect changes in total family income, as determined by Local WDB policies.

Methodology - The ~~Northwest TN Workforce Board~~ LWDB has authorized weekly needs-based payments for Adults and Dislocated Workers based on the amount needed for the participant and his / her family to reach the poverty level for the family size, to be adjusted as family income changes, and not to exceed:

- (a) The maximum weekly unemployment compensation benefit amount of \$275 for individuals who have not been determined eligible to receive unemployment benefits.
- (b) The applicable weekly level of the unemployment compensation benefit, for participants who were eligible for unemployment compensation as a result of the qualifying dislocation.

Example: An applicant is made eligible as an Adult participant as part of a family of four in accordance with the guidelines set forth in the WIOA and relate federal, state, and local guidance. The participant's total family income is \$15,575 per year. The family income is deducted from the poverty level for the family size and converted to weekly rate for needs-related payments as shown below.

\$24,300 per year (Poverty Level for a Family of 4) - \$15,575 per year (Total Annual Family Income)

\$8,725 per year (Amount Needed per Year)

\$8,725 per year / 52 Weeks per Year = \$167.79 Needed per Week

The participant is eligible to receive the full \$167.79 per week since it is less than the maximum weekly unemployment benefit of \$275, and the individual has not drawn unemployment.

**Exceptions to Support Services Limits**

The One-Stop Operator may grant exceptions to the limits established for supportive services by submitting a written request for individual need, including supporting documentation, to the Executive Director of the ~~Northwest TN Workforce Board~~ LWDB. For example, an individual who has childcare needs expected to exceed the \$21,500 limit may request to use other available funding (i.e. unused ITA funds) to cover the expected costs. A decision will be rendered within 5 working days.

**Unallowable Support Services**

Support services may not be used to pay for expenses incurred prior to the participant's enrollment into the WIOA program. Program Management approval is required and should be documented. Advances against future payments are not allowed. Examples of unallowable services include, but are not limited to:

- Fines and penalties such as traffic violations, late finance charges, and interest payments
- Entertainment, including tips
- Contributions and donations
- Vehicle or mortgage payments
- Refund deposits
- Alcohol or tobacco products
- Pet food
- Items to be purchased for family or friends
- Out-of-state job search and relocation expenses that will be paid by the prospective employer

**Reference:** 20 CFR 680.900; 20 CFR 680.970; 20 CFR 681.570; WIOA Section 106(c)(1)(F)

**Related TDLWD Policy:** LWDA Supportive Services Guidance 5-8-17 (pages 2 and 4)

**Vetted and Approved by the Northwest Tennessee Workforce Board:** November 15, 2022

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Jimmy Williamson, Chair~~man~~  
Northwest Tennessee Workforce Board

## Verifying Identity and Employment Eligibility

**Effective Date:** November 15, 2022

**Duration:** Indefinite

**Purpose:** To establish the requirement for verification of employment eligibility for citizens and non-citizens employed with Workforce Innovation and Opportunity Act funds (WIOA) and to provide guidance on the acceptable documentation to support participant eligibility for programs funded by the WIOA. The documentation sources listed have been established based on Data Validation requirements and concerns for the accuracy, effectiveness, and reliability of the eligibility determination process.

**Policy:** Citizenship is not required for WIOA eligibility. Applicants may present documentation of either citizen status or legal right to work in the United States. WIOA Section 188(a)(5) specifies that participation in WIOA is available to citizens and nationals of the U.S., lawfully admitted permanent resident aliens, refugees, asylees and parolees, and other immigrants authorized to work in the United States. Individuals with employment authorization qualify as “immigrants authorized by the Attorney General to work in the United States.” Therefore, workforce participants with employment authorization may access any WIOA services for which they otherwise would qualify. Individuals meeting the requirements set forth in TEGL 02-14 (Eligibility of Deferred Action for Childhood Arrivals {DACA}), along with participants for Title I and Wagner-Peyser Act programs, are granted relief under the DACA Initiative with employment authorization documents.

It is important to note that verification is far different than hard copy documentation. Verification means to confirm eligibility requirements through examination of official documents, e.g. birth certificate, social security card, public assistance records, etc. Documentation means to maintain physical evidence, which is obtained during the verification process, in participant files. (EXAMPLE: Copies of documents such as driver’s license, birth certificate, etc.). It is the policy of the LWDB that all individuals must be registered in Jobs4TN. **If staff register Registered Adults, Dislocated Workers, and Youth, the staff must verify the General and Specific Eligibility criteria that pertain to each specific program, which consists of citizenship or eligible to work in the United States, selective service (if applicable) and age. If an individual self-registers, they are considered to self-attest to the General and Specific eligibility criteria. Upon a decision to enroll an applicant into WIOA, the staff will document all General and Specific Eligibility criteria.**

Prior to enrollment in WIOA individualized career services, training or employment services, such as work experience, a citizen or non-citizen must provide documentation to the employer of record that he/she is allowed to work in the United States. The Employment Eligibility Verification form, commonly referred to as the I-9 Form, must be completed prior to beginning employment. The I-9 form is a United States Citizenship and Immigration Services document used by employers to **verify document** an employee’s identity and establish that the worker is eligible to accept employment in the United States. The I-9 form may be accessed at <https://www.uscis.gov/I-9>. Instructions for completion of the form and required documentation can be found at <http://www.justice.gov/crt/file/798276/download> - “Guidance for Employers Conducting Internal Employment Eligibility Verification Form I-9”. Required documentation to verify employment eligibility must be uploaded to the participant’s Virtual One-Stop (VOS) file for monitoring and audit purposes.

In alignment with WIOA Section 188, the individual may identify as any of the following:

- Citizen of the United States
- Lawfully admitted permanent resident alien
- Refugee, asylee, or parolee
- Other immigrants authorized by the Attorney General to work in the United States
- None of the above

If any individual responds that he/she is a DACA recipient, AJC staff will ask if they are authorized to work in the United States. DACA recipient with authorization to work are eligible for all WIOA Title I services, including the following training services:

- o On-the-Job Training (OJT)
- o Short-term Skills Upgrade
- o Transitional Training Services
- o Work-based Training

- o Entrepreneur Training
- o Apprenticeship
- o Incumbent Worker Training (IWT)

DACA recipients who are not authorized to work in the United States are eligible for basic career services only:

- o Eligibility Determination
- o Outreach and Intake
- o Assessment
- o Labor Market Information (LMI) Services
- o Local Performance Information
- o Information on Support Services
- o Information Regarding Unemployment Benefits
- o Assistance in Establishing Eligibility for Education and Financial Assistance

The LWDB utilizes copies of social security card and driver's license as documentation to verify identity and employment eligibility in most cases. Should one of these items not be accessible from the individual, a copy is made of one of the other items listed on the I-9 form as documentation of either identity or employment authorization, as necessary. The LWDA also checks the Selective Service website at <https://www.sss.gov/> for all age-appropriate individuals and prints out the information as documentation that the individual is compliant with registration of selective service. All copies of documentation are uploaded into the participant's Virtual One-Stop (VOS) file on the jobs4tn website.

**Reference:** 20 CFR 681.210(a); WIOA Section 188(a)(5). These Federal References demonstrate any individual is eligible to receive American Job Center services if they: are at least 16 years of age and are able to legally work in the United States.

**Attachment:** I-9

**Related TDLWD Policy:** Verifying Identity & Employment Eligibility Guidance (pages 2 and 3)

**Vetted and Approved by the ~~Northwest Tennessee Local Workforce Development~~ Board:** November 15, 2022

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Jimmy Williamson, Chairman  
Northwest Tennessee Workforce Board



**Employment Eligibility Verification**  
**Department of Homeland Security**  
**U.S. Citizenship and Immigration Services**

**USCIS**  
**Form I-9**  
 OMB No. 1615-0047  
 Expires 10/31/2022

► **START HERE:** Read instructions carefully before completing this form. The instructions must be available, either in paper or electronically, during completion of this form. Employers are liable for errors in the completion of this form.

**ANTI-DISCRIMINATION NOTICE:** It is illegal to discriminate against work-authorized individuals. Employers CANNOT specify which document(s) an employee may present to establish employment authorization and identity. The refusal to hire or continue to employ an individual because the documentation presented has a future expiration date may also constitute illegal discrimination.

**Section 1. Employee Information and Attestation** (Employees must complete and sign Section 1 of Form I-9 no later than the first day of employment, but not before accepting a job offer.)

Last Name (Family Name)		First Name (Given Name)		Middle Initial	Other Last Names Used (if any)	
Address (Street Number and Name)			Apt. Number	City or Town		State ZIP Code
Date of Birth (mm/dd/yyyy)	U.S. Social Security Number [ ][ ] - [ ][ ] - [ ][ ][ ]		Employee's E-mail Address		Employee's Telephone Number	

I am aware that federal law provides for imprisonment and/or fines for false statements or use of false documents in connection with the completion of this form.

I attest, under penalty of perjury, that I am (check one of the following boxes):

<input type="checkbox"/> 1. A citizen of the United States	
<input type="checkbox"/> 2. A noncitizen national of the United States (See instructions)	
<input type="checkbox"/> 3. A lawful permanent resident (Alien Registration Number/USCIS Number): _____	
<input type="checkbox"/> 4. An alien authorized to work until (expiration date, if applicable, mm/dd/yyyy): _____ Some aliens may write "N/A" in the expiration date field. (See instructions)	
Aliens authorized to work must provide only one of the following document numbers to complete Form I-9: An Alien Registration Number/USCIS Number OR Form I-94 Admission Number OR Foreign Passport Number.	
1. Alien Registration Number/USCIS Number: _____ OR 2. Form I-94 Admission Number: _____ OR 3. Foreign Passport Number: _____ Country of Issuance: _____	QR Code - Section 1 Do Not Write in This Space

Signature of Employee	Today's Date (mm/dd/yyyy)
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**Preparer and/or Translator Certification (check one):**

☐ I did not use a preparer or translator. ☐ A preparer(s) and/or translator(s) assisted the employee in completing Section 1.  
 (Fields below must be completed and signed when preparers and/or translators assist an employee in completing Section 1.)

I attest, under penalty of perjury, that I have assisted in the completion of Section 1 of this form and that to the best of my knowledge the information is true and correct.

Signature of Preparer or Translator		Today's Date (mm/dd/yyyy)	
Last Name (Family Name)		First Name (Given Name)	
Address (Street Number and Name)		City or Town	State ZIP Code



*Employer Completes Next Page*







**Employment Eligibility Verification**  
**Department of Homeland Security**  
**U.S. Citizenship and Immigration Services**

**USCIS**  
**Form I-9**  
 OMB No. 1615-0047  
 Expires 10/31/2022

**Section 2. Employer or Authorized Representative Review and Verification**

*(Employers or their authorized representative must complete and sign Section 2 within 3 business days of the employee's first day of employment. You must physically examine one document from List A OR a combination of one document from List B and one document from List C as listed on the "Lists of Acceptable Documents.")*

<b>Employee Info from Section 1</b>	Last Name (Family Name)	First Name (Given Name)	M.I.	Citizenship/Immigration Status
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List A Identify and Employment Authorization	OR	List B Identity	AND	List C Employment Authorization
Document Title		Document Title		Document Title
Issuing Authority		Issuing Authority		Issuing Authority
Document Number		Document Number		Document Number
Expiration Date (if any) (mm/dd/yyyy)		Expiration Date (if any) (mm/dd/yyyy)		Expiration Date (if any) (mm/dd/yyyy)
Document Title		<div style="border: 1px solid black; padding: 5px;"> <b>Additional Information</b>   </div>		<div style="border: 1px solid black; padding: 5px;">           OIT Code - Sections 2 &amp; 3            Do Not Write In This Space         </div>
Issuing Authority				
Document Number				
Expiration Date (if any) (mm/dd/yyyy)				
Document Title				
Issuing Authority				
Document Number				
Expiration Date (if any) (mm/dd/yyyy)				

**Certification:** I attest, under penalty of perjury, that (1) I have examined the document(s) presented by the above-named employee, (2) the above-listed document(s) appear to be genuine and to relate to the employee named, and (3) to the best of my knowledge the employee is authorized to work in the United States.

The employee's first day of employment (mm/dd/yyyy): \_\_\_\_\_ (See instructions for exemptions)

Signature of Employer or Authorized Representative		Today's Date (mm/dd/yyyy)	Title of Employer or Authorized Representative	
Last Name of Employer or Authorized Representative		First Name of Employer or Authorized Representative	Employer's Business or Organization Name	
Employer's Business or Organization Address (Street Number and Name)		City or Town	State	ZIP Code

**Section 3. Reverification and Rehires (To be completed and signed by employer or authorized representative.)**

A. New Name (if applicable)			B. Date of Rehire (if applicable)
Last Name (Family Name)	First Name (Given Name)	Middle Initial	Date (mm/dd/yyyy)

C. If the employee's previous grant of employment authorization has expired, provide the information for the document or receipt that establishes continuing employment authorization in the space provided below.

Document Title	Document Number	Expiration Date (if any) (mm/dd/yyyy)
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I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented document(s), the document(s) I have examined appear to be genuine and to relate to the individual.

Signature of Employer or Authorized Representative	Today's Date (mm/dd/yyyy)	Name of Employer or Authorized Representative
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**LISTS OF ACCEPTABLE DOCUMENTS****All documents must be UNEXPIRED**

Employees may present one selection from List A  
or a combination of one selection from List B and one selection from List C.

<b>LIST A</b> Documents that Establish Both Identity and Employment Authorization	<b>OR</b>	<b>LIST B</b> Documents that Establish Identity	<b>AND</b>	<b>LIST C</b> Documents that Establish Employment Authorization
1. U.S. Passport or U.S. Passport Card		1. Driver's license or ID card issued by a State or outlying possession of the United States provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address		1. A Social Security Account Number card, unless the card includes one of the following restrictions: (1) NOT VALID FOR EMPLOYMENT (2) VALID FOR WORK ONLY WITH INS AUTHORIZATION (3) VALID FOR WORK ONLY WITH DHS AUTHORIZATION
2. Permanent Resident Card or Alien Registration Receipt Card (Form I-551)		2. ID card issued by federal, state or local government agencies or entities, provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address		2. Certification of report of birth issued by the Department of State (Forms DS-1350, FS-545, FS-240)
3. Foreign passport that contains a temporary I-551 stamp or temporary I-551 printed notation on a machine-readable immigrant visa		3. School ID card with a photograph		3. Original or certified copy of birth certificate issued by a State, county, municipal authority, or territory of the United States bearing an official seal
4. Employment Authorization Document that contains a photograph (Form I-766)		4. Voter's registration card		4. Native American tribal document
5. For a nonimmigrant alien authorized to work for a specific employer because of his or her status: a. Foreign passport; and b. Form I-94 or Form I-94A that has the following: (1) The same name as the passport; and (2) An endorsement of the alien's nonimmigrant status as long as that period of endorsement has not yet expired and the proposed employment is not in conflict with any restrictions or limitations identified on the form.		5. U.S. Military card or draft record		5. U.S. Citizen ID Card (Form I-197)
		6. Military dependent's ID card		6. Identification Card for Use of Resident Citizen in the United States (Form I-179)
		7. U.S. Coast Guard Merchant Mariner Card		7. Employment authorization document issued by the Department of Homeland Security
		8. Native American tribal document		
		9. Driver's license issued by a Canadian government authority		
		<b>For persons under age 18 who are unable to present a document listed above:</b>		
		10. School record or report card		
		11. Clinic, doctor, or hospital record		
		12. Day-care or nursery school record		
6. Passport from the Federated States of Micronesia (FSM) or the Republic of the Marshall Islands (RMI) with Form I-94 or Form I-94A indicating nonimmigrant admission under the Compact of Free Association Between the United States and the FSM or RMI				

Examples of many of these documents appear in the Handbook for Employers (M-274).

Refer to the instructions for more information about acceptable receipts.

## Work-Based Training

**Effective Date:** November 15, 2022

**Duration:** Indefinite

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

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

The ~~NWTNWB~~ LWDB strives to utilize a significant amount of funding ~~approximately 10% of funding~~ allocated to local area through formula program funds and / or specialized funding such as Consolidated Business Grants (CBGs) to provide work-based learning opportunities. Appropriate support services, as described in the Supportive Services policy in this document, may be used in combination with work-based training as prescribed below and in accordance with the needs of participants.

~~At an estimated cost of \$2,500 per individual, approximately 100 participants would be expected to be served through work-based learning opportunities, contingent upon funding availability and employer hiring needs, with a focus on serving individuals with barriers to employment.~~

### Outreach to Employer Community

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

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

### General Employer Business Eligibility Criteria

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

- Be registered with Internal Revenue Service (IRS), have an account with Unemployment Insurance, and carry workers' compensation insurance (Federal Register Vol. 81, No. 161, Page 56117) and be current on all local, state and federal tax obligations.
- Be financially solvent and have an adequate payroll recordkeeping system that tracks hours worked, gross pay, deductions, and net pay.
- Must not appear on any federal suspension or debarment list.
- **Be able to enter into** agreements **that** will not displace any currently employed worker (WIOA Section 181[b][2][A]).
- **Be able to enter into** agreements **that** will not **result in be made with an employer who has** termination of any regular employee, or otherwise reduced the workforce, in order to hire **an OJT a work-based training** employee.
- **No contract may be written with a company that has** Verify relocation (for the first 120 days after beginning operations) **if the move** has **not** resulted in any employee job losses at the original location (WIOA Section 181[d][2]). To verify that the relocation has not resulted in a loss of employment, WIOA program staff and the **OJT work-based training** employer must complete a Standardized Pre-Award Review.
- **The employer must** Not currently be involved in a labor dispute (20 CFR 680.840) or have workers currently in a layoff status for the **OJT work-based training** position.
- **Assure** employees **may** do not work on construction, maintenance, or operation of any facility that is used for sectarian activities (WIOA Section 188[a][3]).
- **The prospective employers** Must not meet the existing "pattern of failing to provide OJT **specific work-based training** participants with continued long-term employment as regular employees with wages and employment benefits" (20 CFR 680.700[b]).
- **The Employer** Must not illegally discriminate in training or hiring practices because of race, color, sex, national origin, religion, disability, political beliefs or affiliation, or age.
- **Assure** training for employees must be in an in-demand industry as determined by the **Northwest Tennessee Local Workforce Development Board (LWDB)** and/or its' Service Provider.
- **Assure** training will benefit employees by increasing opportunity for learning new skills, gaining experience, retention, advancement, credentials or wages.
- **Assure** training will benefit the employer by providing assistance with training employees, which may result in saving jobs or preventing layoffs, enhance process improvement, or improve the overall competitiveness of the employer.
- Per WIOA regulations (10 CFR 638.200(g), **assure** "no individual may be placed in an employment activity if a member of that person's immediate family is directly supervised by or directly supervises that individual." For the purpose of this policy, the term "immediate family" includes a spouse, child, son-in-law, daughter-in-law, parent, mother-in-law, father-in-law, sibling, bother-in-law, sister-in-law, aunt, uncle, niece, nephew, step-parent, step-child, grandparent or grandchild
- **Comply with all contract/agreement provisions in accordance with the local workforce development board, Tennessee Department of Labor and Workforce Development and the Workforce Innovation Opportunity Act guidance and regulations.**

### General Participant Eligibility

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

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

sites. Social media accounts are also used to connect with customers and other agencies and inform them of the services available through the AJC.

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

In addition, the participant must be:

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

### *Work-Base Training Components*

#### **Incumbent Worker Training**

~~According to the WIOA, “the local board may reserve and use not more than 20 percent of the funds allocated to the local area involved under section 133(b) to pay for the Federal share of the cost of providing training through a training program for incumbent workers.”~~

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

- **ITW Funding:** The LWDB may provide incumbent worker training using statewide discretionary funds provided by the Governor and/or under WIOA Section 134(d)(4)(A)(i) of WIOA, LWDBs can use up to twenty percent (20%) of their adult and dislocated worker formula funds to provide for the Federal share of the cost of providing incumbent worker training.
- **Eligibility Requirements for Employers for IWT Grant:** An employer must meet all the following criteria in order to qualify for an Incumbent Worker Training Grant:
  - Grantee must be classified as a Tennessee for-profit business (or a not-for-profit business in health care)
    - Be in an in-demand industry as determined by Jobs4TN labor market information; OR
    - Be in an in-balance industry as determined by Jobs4TN labor market information
    - Be in a declining industry, but with compelling reasons (e.g., evidence of long-term viability of the employer) justifying investment in incumbent worker training
  - Must be in operation for at least one year
  - Must employ at least five full-time employees
  - Must be current on all local, state, and federal tax obligations
  - Must be a financially viable business not currently or recently experiencing, nor expecting to experience, a bankruptcy
  - Must not appear on any federal suspensions or debarment list
  - The Employer must be able to match requested training costs. Percentage of match is based on the size of the company, in accordance with Tennessee Department of Labor and Workforce Development policy (see Employer Share and Qualifying Costs below).
  - Must agree to submit reimbursement requests in the timely manner agreed upon with the LWDA, with required support documentation.
  - Must agree to complete an online monthly status report if required by the TDLWD.

- Additional factors considered when determining employer eligibility include
  - The characteristics of the incumbent workers to be trained and how they would benefit from retention or advancement – consideration should be given to employers who propose to train individuals with barriers to employment as defined in WIOA Section 3(24).
  - The quality of training – whenever possible the training should allow the participant to gain industry-recognized training experience and/or lead to industry-recognized credentials and/or an increase in wages.
  - The number of participants the employer plans to train or retrain
  - The wage and benefit levels of participants both before and after training
  - The occupation(s) for which incumbent worker training is being provided must be in demand for that industry

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

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

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

Reimbursable Training Expenses are as follows:

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

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

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



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

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

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

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

### **On-the-Job Training**

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

### **Registered Apprenticeships**

A Registered Apprenticeship (RA) is an "earn and learn" training model that combines structured learning with on-the-job training from an assigned mentor. The goal is to provide workers with advanced sets of skills that meet the specific needs of employers. Upon completion of a RA program, participants receive an industry

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

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

### **Transitional Jobs**

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

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

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

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

- **Set - OJT Position** Up to 320 hours of employment through an OJT grant, based on the job seeker's needs as documented on the ISS and the training needs of the position as demonstrated by the Specific Vocational Preparation (SVP) level of the position. Employers may be reimbursed up to 50% of an eligible OJT participant's wages for the completion of the specified training period in accordance with the guidelines set forth in the Business Services Manual, OJT Assurances, and OJT Needs Assessment.
- **Hire!** Employers are encouraged to consider hiring participants who successfully complete a Transitional Job, with or without an OJT contract. Participants on an OJT contract are employees of the business and are expected to be retained upon the successful completion of the training period. Employers may qualify for a Work Opportunity Tax Credit ranging from \$1,200 to \$9,600 for hiring individuals with barriers who are considered a member of a qualified targeted group.
- ***Eligibility Criteria:*** In order to be eligible for a transitional job, applicants must:

- Be determined eligible as an Adult or Dislocated Worker in accordance with the guidelines set forth in the Adult and Dislocated Worker Eligibility section of this Manual; and
- Have a barrier(s) to employment as documented by being a member of 1 or more of the following populations in accordance with the guidelines set forth in this Manual:
  - Displaced homemakers.
  - Low-income individuals.
  - Indians, Alaska Natives, and Native Hawaiians, as such terms are defined in section 166.
  - Individuals with disabilities, including youth who are individuals with disabilities.
  - Older individuals.
  - Ex-offenders.
  - Homeless individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))), or homeless children and youths (as H. R. 803—10 defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))).
  - Youth who are in or have aged out of the foster care system.
  - Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers.
  - Eligible migrant and seasonal farmworkers, as defined in section 167(i).
  - Individuals within 2 years of exhausting lifetime eligibility under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.).
  - Single parents (including single pregnant women).
  - Long-term unemployed individuals (i.e. individuals who have been unemployed 27 weeks or longer).
  - Such other groups as the Governor involved determines to have barriers to employment; and
- Be chronically unemployed or have an inconsistent work history, as defined by the LWDB in accordance with § 680.190, and documented in the work history section of the Application. Taking into consideration an individual's labor market history, unemployment status, durations of unemployment, and long-term unemployment status, the ~~Northwest TN Workforce Board~~ LWDB has determined individuals to be chronically unemployed or to have an inconsistent work history if they meet one or more of the following items:
  - Currently unemployed and have been unemployed for 27 weeks or longer (long-term unemployed).
  - Currently unemployed for less than 27 weeks but have had at least one period of unemployment for 27 weeks or longer within the last 5 years.
  - Two or more significant (10 weeks or longer) gaps in employment within the last five years.
  - Three or more position changes within the last three years.
  - Three or more gaps in employment within the last three years.
  - Have been incarcerated within the last 10 years; and
- Receive appropriate Basic and / or Individualized Career Services to prepare for a successful entry into and retention in a transitional job and ultimately unsubsidized employment as documented on the ISS; and
- Receive support services, as described in the Supportive Services section of this Manual, in order to be able to participate in a transitional job and ultimately unsubsidized employment.

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

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

According to 20 CFR § 680.180, for the purposes of WIOA sec. 134(c)(2)(A)(xii)(VII), an internship or work experience is a planned, structured learning experience that takes place in a workplace for a limited period of time. Internships and other work experience may be paid or unpaid, as appropriate and consistent with other laws, such as the Fair Labor Standards Act. An internship or other work experience may be arranged within the



private for profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience setting where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists. This experience provides participants with opportunities for career exploration and skill development. Work experience must include academic and occupational education (20 CFR 681.600[a-b]). ~~Work experience is defined as paid (subsidized) or unpaid work experience that is a planned, structured learning experience in a workplace for a limited period of time.~~

WIOA identifies four categories of work experience: (1) summer employment opportunities and other employment opportunities available throughout the school year; (2) pre-apprenticeship programs; (3) internships and job shadowing; and (4) on-the-job training (OJT) opportunities as defined in WIOA Section 3(44) and in 20 CFR § 680.700. Eligible WIOA youth program participants may participate in more than one work experience program (i.e. summer employment, job shadowing, pre-apprenticeship) over the duration of their program participation (20 CFR 681.600[c]). **Work experience will enhance employability of youth through the development of work readiness and basic work skills including, but not limited to communication, punctuality, attendance, dependability, teamwork, completing a task, time management, decision making, motivation and conflict resolution.**

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

Paid Work Experiences will be paid through the program at the higher of 100% of the starting rate of the position being performed or a minimum of \$8.00 per hour wage. **Participants may work up to 40 hours per week for up to six (6) months, not to exceed 975 total hours as designated by the contract/agreement and individual employment plan.**

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

### **Work Experience - Adult and Dislocated Worker**

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

**Eligible Adults and Dislocated Workers over the age of 24 may be served through the Transitional Job component.** Transitional jobs are a type of work experience, as described in §§ 680.190 and 680.195 **and addressed separately in this policy.**

### *Contracts and Agreements for Work-Based Training*

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

- Basic Program description
- Cost Per Participant (varies by activity; subject to ~~Northwest TN Workforce Board~~ LWDB policy)
- Appropriate goals for the participant and/or employer.
- The contract awarded will be cost reimbursement. No expenses are reimbursable until a contract has been fully executed (signed by all parties) and, all participant data has been submitted and deemed eligible.

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

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

### *Monitoring for Work-Based Training*

Work-based training expenditures are tracked accordingly in the accounting system of record and reported monthly on internal documents as well required State reports. Expenditures and obligations are monitored monthly to ensure compliance with appropriate expenditure and obligation requirements, ~~such as 80% of CBG funds being allocated within the first 180 days of the grant.~~ Monitoring will be based on the contract agreement and may be performed by the contract manager or another position. If the Work-based training is for reimbursement of wages, the employer must submit the following for review:

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

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

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

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

~~Work experience expenditures are recorded in the NWTNWB LWDB accounting system of record and tracked monthly, both on internal documents and required State reports.~~

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

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

**Vetted and Approved by the ~~Northwest Tennessee Local~~ Workforce Development Board:** November 15, 2022

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Jimmy Williamson, Chair  
Northwest Tennessee Workforce Board

## Adult and Dislocated Worker Eligibility

**Effective Date:** November 15, 2022

**Duration:** Indefinite

**Purpose:** To establish a policy to provide guidance to staff and contractors in determining and documenting eligibility for the Title I Adult and Dislocated Worker programs.

**Policy:** The Workforce Innovation and Opportunity Act (WIOA) allows for services to be provided to eligible Adults and Dislocated Workers. The determination of eligibility encompasses all activities beginning with an application to the final disposition of the application. The applicant has the right and the responsibility to participate in the eligibility determination and is relied on as the first source of information. The applicant is informed of the information needed to establish each condition of eligibility and of the assistance that can be given in establishing eligibility. If the applicant is unable to participate in the eligibility determination because of physical or mental disability, inability to speak English (LEP), or other difficulties, AJC staff is responsible for making arrangements for providing the applicant with the needed assistance to establish eligibility.

### Title I Adult Eligibility Requirements

According to the WIOA, individuals must meet the following requirements in order to be eligible for the Title I Adult program:

1. Age 18 or older
2. Citizens or nationals of the United States, or other lawfully admitted persons<sup>2</sup>
3. In compliance with the Military Service Act (for males born on January 1, 1960, and later)

### Title I Dislocated Worker Eligibility Requirements

According to the WIOA, a Dislocated Worker is an individual who meets the above requirements and —

- (A)** (i) has been terminated or laid off, or who has received a notice of termination or layoff, from employment; (ii)(I) is eligible for or has exhausted entitlement to unemployment compensation; **or** (II) has been employed for a duration sufficient to demonstrate, to the appropriate entity at a one-stop center referred to in section 121(e), attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a State unemployment compensation law; **and** (iii) is unlikely to return to a previous industry or occupation;
- (B)** (i) has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility, or enterprise; (ii) is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; **or** (iii) for purposes of eligibility to receive services other than training services described in section 134(c)(3), career services described in section 134(c)(2)(A)(xii), or supportive services, is employed at a facility at which the employer has made a general announcement that such facility will close;
- (C)** was self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters;
- (D)** is a displaced homemaker - an individual who has been providing unpaid services to family members in the home **and** who—
- (A)(i) has been dependent on the income of another family member but is no longer supported by that income; **or** (ii) is the dependent spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of title 10, United States Code) and whose family income is significantly reduced because of a deployment (as defined in section 991(b) of title 10, United States Code, or pursuant to paragraph (4) of such section), a call or order to active duty pursuant to a provision of law referred to in section 101(a)(13)(B) of title

10, United States Code, a permanent change of station, or the service-connected (as defined in section 101(16) of title 38, United States Code) death or disability of the member; **and**

(B) is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

**(E)** (i) is the spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of title 10, United States Code), and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member; **or**

(ii) is the spouse of a member of the Armed Forces on active duty and who meets the criteria described in paragraph (16)(B).

#### Requirement for Documentation for Verifying Eligibility

Although the applicant is the first source of information, the applicant is not the only source, and all information relating to eligibility must be verified by documents furnished by the applicant or from information supplied by collateral sources in accordance with federal, state, and local regulations. Documentation obtained for verifying eligibility must meet the guidelines listed below as well as those listed in the Workforce Services Guidance – Title I Adult and Dislocated Worker Eligibility for each eligibility criteria.

#### Requirement for Area Residency

All customers receiving Basic Career Services (registering in Jobs4TN.gov, workshops, job search, resume development, basic skills assessment, filing or certifying for UI, etc.) are not required to live in the service area to receive services. All participants being enrolled in Occupational Skills Training are required to live in the service area to receive training funds. On-the-Job Training (OJT) and Incumbent Worker Training (IWT) participants are not required to live in the service area since this is an employer service and the employer may hire employees outside of our service area.

Examples of acceptable documents to establish residency include a Driver's License with an address that matches the WIOA application address, a lease, utility bill, bank account information, or documentation of address from another state agency (SNAP, TANF, car registration, voter registration card, etc.)

#### Requirement for Social Security Number (SSN)

A SSN or application for a SSN is required from every participant. Staff must verify the SSN by obtaining a copy of the card for the case file, such as DHS, TDLWD, or school records. The documentation must be uploaded in VOS and linked to eligibility documentation. Any discrepancies in name (marriage, divorce, etc.) must have supporting documentation (such as a marriage or divorce certificate) and be documented in a case note. Persons for whom a SSN is required but not available must be referred to the appropriate Social Security Administration (SSA) office for SSN enumeration. Applicants must provide verification from SSA indicating they have made application. The application will not be processed until such a time the number has been received by the participant and a copy provided to the AJC staff.

#### Requirement for Citizenship

In order to establish eligibility for a WIOA participant, citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, and other immigrants authorized to work by the Attorney General in the United States or who have been issued a work permit by the U.S. Immigration and Naturalization service (INS) must be established.

#### Selective Service

All males born on or after January 1, 1960, must be registered timely (between the ages of 18 and 25) for Selective Service. Men cannot register after reaching age 26. All males required to register must provide proof of registration prior to enrollment into WIOA. If they are between the ages of 18 and 26 and have not registered they will be given the opportunity to register immediately, or the Staff may register the applicant with his permission. If a male, who was required to register did not register prior to their 26<sup>th</sup> birthday they must obtain a waiver as allowed by the MSSA (Military Selective Services Act).

#### *Who must Register?*

With only a few exceptions, the registration requirement applies to all male U.S. citizens and male aliens residing

# LOCAL WORKFORCE DEVELOPMENT BOARD PARTICIPANT PROGRAM POLICY

in the United States who are 18 through 25 years of age. This includes all male non-citizens within these age limits who permanently reside in the U.S., as well as men with "green cards" and men living in the U.S. without INS documentation (undocumented aliens) must also register. Non-immigrant men who are in the U.S. temporarily (diplomatic corps, trade mission personnel, men holding valid visitor or student visas, etc.) do not register. A male non-citizen who first enters the U.S. as a permanent resident after he has already passed his 26<sup>th</sup> birthday is not required to register because he is over the age limit. Women do not register because the law does not apply to them.

Category	Yes	No
All male U.S. Citizens born after December 31, 1959, who are 18 but not yet 26 years old, except as noted below.	X	
Military – Related		
Members of the Armed Forces on active duty (active duty for training does not constitute “active duty” for registration purposes)		X*
Cadets and Midshipmen at Service Academies or Coast Guard Academy		X*
Cadets at the Merchant Marine Academy	X	
Students in Officer Procurement Programs at The Citadel, North Georgia College and State University, Norwich University, Virginia Military Institute, Texas A&M University, Virginia Polytechnic Institute and State University		X*
National Guardsmen and Reservists not on active Duty	X	
Delayed Entry Program enlistees	X	
ROTC Student	X	
Separates from Active Military Service, separated for any reason before age 26	X*	
Men rejected for enlistment for any reason before age 26	X	
Civil Air Patrol members	X	
Aliens **		
Lawful non-immigrants on visas (e.g., diplomatic and consular personnel and families, foreign students, tourists with unexpired Forms I-94, I-95A, or Border Crossing Documents I-94 or Boarder Crossing Document DSP-150)		X
Permanent resident aliens	X	
Special (seasonal) agricultural workers (I-688)	X	
Special agricultural worker (I-688A)		X
Refugee, parolee, and asylee aliens	X	
Undocumented (illegal) aliens	X	
Dual National U.S. citizens	X	
Confined		
Incarcerated, or hospitalized or institutionalized for medical reasons		X*
Handicapped physically or mentally		
Able to function in public with or without assistance	X	
Continually confined to a residence, hospital, or institution		X

\* Must register within 30 days of release unless already age 26, or already registered when released, or unless exempt during entire period age 18 through 25.

\*\* Residents of Puerto Rico, Guam, Virgin Islands, and Northern Mariana Islands are U.S. Citizens. Citizens of American Samoa are nationals and must register when they are habitual residents in the United States. Habitual residence is presumed whenever a national or a citizen of the Republic of the Marshall Islands or the Federated States of Micronesia resides in the United States for more than one year in any status, except as a student or employee of the government of his homeland.

NOTE: Immigrants who did not enter the United States or maintain their lawful non-immigrant status by continually remaining on a valid visa until after they were 26 years old were never required to register. Also, immigrants born before 1960 who did not enter the United States or maintain their lawful non-immigrant status by continually remaining on a valid visa until after March 29, 1975, were never required to register.



*Waivers*

The MSSA provides for men who did not register and have subsequently turned 26 and are now being denied eligibility for Federal student financial aid, Federal job training, or Federal employment, or are having difficulty obtaining U.S. citizenship because they failed to register, the ability to request a waiver. The MSSA also allows the benefit agency handling the case, not the Selective Service, to determine whether the individual has shown that failure to register was not knowingly and willingly. The final decision regarding eligibility for the benefit will be made by the agency granting the benefit (for example, for student financial aid, this would be the Department of Education). For Title I eligibility, the person would need to obtain an official response from Selective Service stating whether or not he is or is not required to register in the form of a "status information" letter. Once an applicant provides a staff member with a copy of his Status Information Letter, he can receive services from WIOA provided that all additional requirements have been met.

*Veteran's Status*

A Veteran is defined as an individual who served in the U.S. Military, naval, or air service for a period of not less than or equal to 180 days, or who was discharged under conditions other than dishonorable; or an individual who met the above conditions for more than 180 days. This definition includes the following individuals, Disabled Veterans (Disabled because of a service connected disability or is rated at 30% or more by the DBA, or at 10 or 20 % for a serious employment disability), Campaign Veteran (An individual who served on active duty in the U/S. military during a war), and Recently Separated Veteran's (an individual who applied for WIOA within 48 months after discharge or release from active duty). Veteran's status must be confirmed by obtaining a copy of their DD214 or other identification confirming the individual as a veteran, and allowing him / her to receive priority for services.

*Self-Sufficiency*

In accordance with the WIOA, all local areas may establish a policy defining self-sufficiency for the local area. Additionally, the Tennessee Department of Labor and Workforce Development is integrating skill shortage training to assist individuals not meeting self-sufficiency by increasing their skill-sets for in-demand occupations. Hence, skill shortage training will be made available to customers who fall at or below the self-sufficiency level and are determined to benefit from the services.

The term "below self-sufficiency", is used with respect to –

- (A) An Adult, Youth or Dislocated Worker (age 18 or older) whose own income is less than 200% of the poverty level or lower living standard income level; or,
- (B) An Adult, Youth or Dislocated Worker (age 18 or older) whose own income is more than 200% of the poverty level; however, in relationship to family size, his/her family income is less than 175% of poverty level or lower living standard income level.
- (C) An Adult, Youth or Dislocated Worker (age 18 or older) who meets the definition of unemployed.
- (D) An Adult, Youth or Dislocated Worker (age 18 or older) who meets the definition of low income.

The ~~Northwest TN Workforce Board~~ Local Workforce Development Board will provide an updated Self-Sufficiency Chart upon receipt of TDLWD issuance of Poverty Guidelines. The chart utilized for determination of eligibility must be uploaded into VOS for criteria (A) and (B).

*Determining Self-Sufficiency*

If applicants who meet all other eligibility criteria for the Adult or Dislocated Worker programs are unemployed, then they automatically meet general eligibility requirements to be determined as non-self-sufficient. Applicants who are employed but meet the definition of low income are also considered non-self-sufficient and meet general eligibility requirements.

As described in the Priority of Service Policy, per TEGL 19-16, Section 134(c)(3)(E) of WIOA, with respect to funds allocated to a local area for Adult employment and training activities, priority must be given to Veterans and eligible spouses, recipients of public assistance, other low income individuals, and individuals who are basic skills deficient for receipt of Individualized Career Services and Training Services.

Employed applicants who do not meet the definition of low income must be determined to be non-self-sufficient in order to meet general eligibility requirements and be eligible for Individualized Career Services and Training services. In order to determine that applicants are not self-sufficient, income must be computed for the individual and / or the applicant's family to establish that the applicant and / or the applicant's family's annual income falls within the income guidelines as shown below. When applicants whose own income exceeds the income guidelines for a family of one, the family members living in the household with the applicant, and their income, may be factored into income computation, thereby raising the family size and income guidelines. Income from other persons who are also members of the household is not included in determining eligibility or self-sufficiency. If the individual is providing support to the information should be documented in the participant's case file.

PROPOSED SELF-SUFFICIENCY CHART				Effective as of 05/01/2022	
				Received from the State 05/04/2022	
	Non-Metro				
Family	Higher of Poverty				
Size	or LLSIL	Percent	Annualized Income	Weekly Earnings	Hourly Wage
1	\$ 13,590.00	200%	\$ 27,180.00	\$ 522.69	\$ 13.07
2	\$ 18,310.00	175%	\$ 32,042.50	\$ 616.20	\$ 15.41
3	\$ 23,030.00	175%	\$ 40,302.50	\$ 775.05	\$ 19.38
4	\$ 27,997.00	175%	\$ 48,994.75	\$ 942.21	\$ 23.56
5	\$ 33,039.00	175%	\$ 57,818.25	\$ 1,111.89	\$ 27.80
6	\$ 38,638.00	175%	\$ 67,616.50	\$ 1,300.32	\$ 32.51
7	\$ 44,237.00	175%	\$ 77,414.75	\$ 1,488.75	\$ 37.22
8	\$ 49,836.00	175%	\$ 87,213.00	\$ 1,677.17	\$ 41.93
9	\$ 55,435.00	175%	\$ 97,011.25	\$ 1,865.60	\$ 46.64
10	\$ 61,034.00	175%	\$ 106,809.50	\$ 2,054.03	\$ 51.35
11	\$ 66,633.00	175%	\$ 116,607.75	\$ 2,242.46	\$ 56.06
12	\$ 72,232.00	175%	\$ 126,406.00	\$ 2,430.88	\$ 60.77
	Metro - Crockett County Only				
Family	Higher of Poverty				
Size	or LLSIL	Percent	Annualized Income	Weekly Earnings	Hourly Wage
1	\$ 13,590.00	200%	\$ 27,180.00	\$ 522.69	\$ 13.07
2	\$ 18,310.00	175%	\$ 32,042.50	\$ 616.20	\$ 15.41
3	\$ 23,349.00	175%	\$ 40,860.75	\$ 785.78	\$ 19.64
4	\$ 28,826.00	175%	\$ 50,445.50	\$ 970.11	\$ 24.25
5	\$ 34,021.00	175%	\$ 59,536.75	\$ 1,144.94	\$ 28.62
6	\$ 39,790.00	175%	\$ 69,632.50	\$ 1,339.09	\$ 33.48
7	\$ 45,559.00	175%	\$ 79,728.25	\$ 1,533.24	\$ 38.33
8	\$ 51,328.00	175%	\$ 89,824.00	\$ 1,727.38	\$ 43.18
9	\$ 57,097.00	175%	\$ 99,919.75	\$ 1,921.53	\$ 48.04
10	\$ 62,866.00	175%	\$ 110,015.50	\$ 2,115.68	\$ 52.89
11	\$ 68,635.00	175%	\$ 120,111.25	\$ 2,309.83	\$ 57.75
12	\$ 74,404.00	175%	\$ 130,207.00	\$ 2,503.98	\$ 62.60

#### Income Computation

Documentation of income for employed applicants who do not meet the definition of low income must be obtained to determine their estimated annual income. Documentation of income should have the person's name, date(s) of the pay period, and the amount of income before deductions. Calculated income must be compared to the appropriate family size of the Self-Sufficiency Income Table. Case notes must always reflect actual computation used to establish eligibility. All income, unless specifically excluded, is considered in determining gross income. Income may be received periodically or at irregular intervals, but only income which is representative of the potential participant's usual earnings should be included in income computation. When paychecks are not reflective of usual earnings, staff will disregard them in computing the income. Income not reflective of usual earnings includes:



- Pay for hours that have not usually been worked and are not scheduled to be worked in the future. This includes overtime if it is not something they receive regularly and vacation pay in addition to regular hours. Staff cannot exclude holiday pay if they routinely receive this.
- A one-time bonus.
- Pay for shift differentials that will not exist in the future.
- Wages less than usual due to unpaid sick or annual days off, a temporary loss of wage differential, or due to reduction in hours that are usually worked and are scheduled to be worked in the future.
- Pay that doesn't reflect recent increase in wages.

When a federal statute specifically states that income or payments received under such statute shall be excluded in determining eligibility for the level of benefits received under any other federal statute, such income or payments are excluded when determining eligibility for WIOA programs. Income excluded from WIOA income computation includes:

- Public Assistance cash payments (including Temporary Assistance to Needy Families (TANF), SSI, Refugee Case Assistance (RCA), and General Assistance (GA));
- Foster care child payments;
- Title IV of the Higher Education Act (i.e., Pell Grants, Federal Supplemental Educational Opportunity Grants (FSEOG), and Federal Work-Study (FWS));
- Needs-Based scholarship assistance;
- Income earned while [the veteran was] on active military duty and certain veteran's benefits (i.e., compensation for service-connected disability, compensation for service-connected death, vocational rehabilitation, and education assistance);
- Capital gains; or any assets drawn down as withdrawals from a bank, the sale of property, a house or a car;
- Tax refunds, gifts, loans, lump-sum inheritances, one-time insurance payments, or compensation for injury;
- Non-cash benefits such as employer paid fringe benefits, food or housing received in lieu of wages, Medicare, Medicaid, school meals, and housing assistance;
- Tribal Government Payments (i.e., Per Capita Payments, Lease Payments, Individual Indian Money (IIM))
- One-Stop Partner programs where income is subsidized (e.g. work experiences, support services);
- Any amounts received as military pay or allowance by any person who served on active duty and certain other specified benefits must be disregarded as income.

**Reference:** WIOA Sections 3(2); 3(16)(ii); 107(d)(5)W; 188 (A)(5); 189(h); 121 (e); USC Section 101 (d)(1) of the title 10, United States Code; USC Section 101 (a)(13)(B) of the title 10, United States Code; Section 101 (16) of the title 38, United States Code

**Related TDLWD Policy:** Workforce Services Guidance – Title I Adult and Dislocated Worker Eligibility

**Vetted and Approved by the ~~Northwest Tennessee~~ Local Workforce Development Board:** November 15, 2022

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Jimmy Williamson, Chair  
Northwest Tennessee Workforce Board