

Northwest TN Workforce Board Outreach and Opportunities Committee

Tuesday, October 25, 2022 – 1:00 p.m.

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

Chair – Ben Marks

Vice Chair – Glad Castellaw

Minutes

Attending

Committee Members Attending via Zoom: David Parrish, Kelly Buffington, Ronnie Gunnels, Ben Marks, Landy Fuqua, Glad Castellaw, Jon Dougherty

Staff and Contractors Attending in-person: Jennifer Bane, Ginger Powell, Laura Speer, Erica Nance (OSO)

Staff and Contractors Attending via Zoom: Lana Burchfiel, Gina Johnson, LeAnn Lundberg, Connie Stewart (CSP), James Starnes (OSO), Kena Hamm

Guests Attending via Zoom: Kristie Bennett, Kiersten Watts, Wanda Malin

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

- **MOTION: Glad Castellaw moved to approve the July 25, 2022 minutes as presented and Ronnie Gunnels seconded the motion. All were in favor and the motion carried.**

Special Populations Updates:

- **Target Populations Report:** Erica Nance presented the attached report. Between July and September there were 520 active Title I cases including 300 youth-aged individuals, 9 Veterans, 50 individuals with a disability, and 348 individuals with barriers to employment including 38 basic skills deficient, 140 underemployed, 69 SNAP recipients, 55 offenders, 31 in a high poverty area, and 245 low-income individuals.
- **Youth Services:** Wanda Malin, worksite supervisor, and youth work experience participant, Kiersten Watts spoke about their experiences with the work experience program. Kiersten was working on earning her HiSet and sought assistance in obtaining her first job from Benton County Career Advisor Connie Wright. Kiersten was placed in a work experience at the Benton County Courthouse. Wanda spoke very highly of Kiersten, praising her for being a hard worker, quick learner, and always being on time. Kiersten did such a wonderful job that they hired her and are encouraging her to grow her career with the County Clerk's office.
- **Offenders/RAMP:** Ginger Powell provided an update on the Re-entry Advanced Manufacturing Program (RAMP) and reviewed the attached report. There have not been many new enrollments, only a few in Dyer County where there are rolling classes by module. The jails continue to see low number of individuals eligible to participate in classes. Quite a few participants have exited since the last report. Ginger stated that staff are working on a proposal for a new re-entry grant.

Promising Practices/Supplemental Grant Updates & New Opportunities

- **Apprenticeship Updates:** A new State Apprenticeship Grant has been received and projected employers and apprentices to be served had to be submitted when requesting funds. The initial request had to be reduced, and as of now it looks like all proposed contracts will come to fruition. Trenton Light and Water is now registered as an apprenticeship.
 - **Registered Electrical Apprenticeship Preparation (REAP):** Over the last few years we have seen a decrease in enrollments and are implementing new recruitment strategies for 2023 to include starting earlier, in the fall, before students have set plans for after high school. Field trips will be hosted in November for early exposure at Amteck (11/14 and 11/28). Jon Dougherty stated that there will also be a starting pay increase to \$15 for the new class instead of \$13.25. Amteck has eleven new apprentices enrolling today.
- **RESEA Grant:** Jennifer Bane went over the attached report. RESEA participants increased slightly for the quarter, but numbers are still low as unemployment numbers continue to be low. We will be receiving significantly less RESEA funding this year.
- **National Dislocated Worker Grant (DWG):** The DWG received to address the COVID-19 pandemic was scheduled to end 6/30/22 but has been extended to 6/30/23. We had spent almost all of our \$807,777 except for about

\$15,849 for disaster-relief employment to providing screening, cleaning, and other COVID-19-related services. We requested additional funds to provide more training services, but we are still waiting for the contract which should be effective 7/1/22. An additional 76 individuals were proposed to be served with the additional funding.

- Other Grants and Projects: Jennifer provided an update on several new grant initiatives.
 - SNAP E&T/AARP Grant: The attached report details the program objectives and outcomes to date for our project with the Greater Memphis area.
 - EDA Good Jobs Grant: A handout was provided with additional details about the grant. New short-term training programs and new accelerated skills training centers will be established under the grant. An industry council for each of the targeted sectors is charged with developing the course curriculum. Employer representatives are still needed to serve on the councils.
 - TANF Opportunity Act—GROWWTH: Services to the 2,500 families proposed under the grant will be offered through the AJCs in NW, SW, and GM. Participants will participate in a three-week readiness academy and then follow a track directly to employment, to training, or to starting a business. Additional funds will be available for expanded supportive services.
 - Rural Health Workforce Training Grants (Baptist Hospital & JSCC Partnerships): Jennifer reported that the NW and SW areas are partners for a Rural Health Workforce Training grant with Jackson State Community College. The grant focuses on increasing students in billing and coding programs and positions by targeted outreach to dual enrollment students, Adult Education students, and other AJC customers. Ginger Powell reported that the NW staff are partners in a similar grant with Baptist Hospitals in Union City and Huntingdon to meet the needs for EMTs / Paramedics and Respiratory Care. Board staff will receive some funding to offer outreach events at area high schools.

Eligible Training Provider List (ETPL) Program Renewals: Laura Speer presented the attached list of programs due for renewal including corresponding labor market information and performance data. There is still demand for all programs, but there are reporting issues right now affecting our ability to accurately track performance. At this time, we have been advised by TN Department of Labor & Workforce Development staff to not rely on performance information in VOS. Staff recommend continued approval of all programs due to no known performance issues and continued demand.

- **MOTION: Glad Castellaw moved to approve the ETPL programs as presented on the attached handout and Ronnie Gunnels seconded the motion. All were in favor and the motion carried.**

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. There are not any significant changes proposed but rather additional details added to align to SW policies which already included more procedural details. The Youth Eligibility policy was updated to include updated poverty data and a few additional barriers to align with SW.

- **MOTION: Ronnie Gunnels 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. Glad Castellaw seconded the motion. All were in favor and the motion carried.**
 - Grievance & Complaint Resolution
 - Training Provider Approval
 - Priority of Service
 - Veterans & Spouses Priority of Service
 - Youth Eligibility
 - Youth Program Design & Incentives

Other:

- 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

NW TN Workforce Board
Outreach and Opportunities Committee
Tuesday, October 25, 2022 – 11:00 a.m.

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

[Join Zoom Meeting](#)
Meeting ID: 872 3224 1870
Passcode: 563911

Chair – Ben Marks
Vice Chair – Glad Castellaw

Agenda

1. Welcome and Call to Order Ben Marks
2. Review and Approval of Minutes of July 25, 2022 Meeting **(Vote Required)** Ben Marks
3. Special Populations Updates
 - a. Target Populations Report Erica Nance
 - b. Youth Services Connie Stewart
 - o Youth Participant / Parent Report
 - c. Offenders / RAMP Ginger Powell
4. Promising Practices/ Supplemental Grant Updates & New Opportunities Ginger Powell
 - a. Apprenticeship Updates
 - State Apprenticeship Grant Update
 - Registered Electrical Apprenticeship Preparation (REAP)
 - b. RESEA Grant Jennifer Bane
 - c. National Dislocated Worker Grant (DWG) Jennifer Bane
 - d. Other Grants & Projects Jennifer Bane
 - SNAP E&T / AARP Grant
 - EDA Good Jobs Grant
 - TANF Opportunity Act - GROWWTH
 - Rural Health Workforce Training Grants (Baptist Hospital & JSCC Partnerships)
5. ETPL Program Renewals **(Vote Required)** Laura Speer
6. Policy Changes **(Vote Required)** Jennifer Bane
 - a. Grievance & Complaint Resolution
 - b. Training Provider Approval
 - c. Priority of Service
 - d. Veterans & Spouses Priority of Service
 - e. Youth Eligibility
 - f. Youth Program Design & Incentives
7. Other Jennifer Bane
 - a. 2023 Committee Meeting Dates / Format
 - Tuesday, 11:00 am, January 24th, April 25th, July 25th, October 24th
 - Hybrid, In-Person Only, or Zoom Only format?

Future Meeting Dates & Upcoming Events

- State Board Meeting: November 4th (Nashville / YouTube)
- Next Board Meeting: Tuesday, November 15th, 11:30 am, Northwest HRA / DD (Martin) & Zoom
- Virtually Speaking Webinar: December 1st, 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),
 - o February 28th, May 23rd, August 22nd (annual / joint meeting with SW), November 28th

**Northwest TN Workforce Board
Outreach and Opportunities Committee**

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Chair – Ben Marks

Vice Chair – Glad Castellaw

Minutes

Attending

Committee Members Attending via Zoom: Ronnie Gunnels, Ben Marks, Landy Fuqua, Lindsay Frilling, Glad Castellaw, Justin Crice, Amy McDonald, Jon Dougherty, Blake Swaggert

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

Guest Attending in-person: Valerie Blankenship

Guests Attending via Zoom: Jayden Patterson (guest participant), Kristie Bennett, Gina Abbott

Review and Approval of Minutes of April 25, 2022 Meeting: Ben Marks called the meeting to order and asked for comments regarding the prior meeting's minutes.

- **MOTION:** Glad moved to approve the April 25, 2022 minutes as presented and Justin Crice seconded the motion. All were in favor and the motion carried.

Special Populations Updates:

- **Target Populations Report:** Erica Nance presented the attached report which shows 923 active participants as of June, including 174 who are youth-aged individuals, 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.
- **Youth Services:** Alyssa Roberts introduced Jayden Patterson, Work Experience participant placed at Auston Mealer's Restaurant Equipment Service in Dyersburg. During his 5 months in this program, he has learned to service ice machines and clean the HVAC units at local fast-food restaurants. He will go on to participate in an OJT and Apprenticeship for HVAC/Refrigeration at Auston Mealer. Jayden said he has enjoyed learning this trade and has great co-workers. He also mentioned the first month in the work experience is hard for a low-income participant since he had to wait a month on the first paycheck and the incentives.
- **Offenders:** Ginger Powell provided an update on the Re-entry Advanced Manufacturing Program (RAMP).
 - **RAMP:** We've only had a few new people added to the program, all from Dyersburg. Gibson County is not ready to have another class since their jail population is still down. The Dyer County class is still done by component. There were a total of 27 male students who started in Dyersburg, and we have a pretty good pass rate of those taking the certification exams with nine out of 10 earning the full CPT. Five out of five passed in Gibson County.
 - **Justice-Involved Individual (JII) Grant:** This grant, through the office of Re-Entry, was completed in June. We served a total of 31 employers, 43 jobseekers, and enrolled six through OJT at Alliance Staffing. The attached report provides detailed information on the outcomes and expenditures.

Promising Practices/ Supplemental Grant Updates & New Opportunities:

- **Apprenticeship Grant (TDLWD):** Ginger went over the attached State Apprenticeship Funding grant handout. We achieved the goal of serving 32 apprentices from October 2021 through June 2022. The revised proposal shows the changes in the employers. Expenses came in slightly under budget due nine apprentices not needing the full \$2,000 per apprentice available.
 - **Registered Electrical Apprenticeship Preparation (REAP):** The attached report details the outreach efforts to promote the program, along with the results from prior years. This year we started with four

participants, three completed the classroom training, and two continued into work experience with Amteck. Ginger mentioned they are looking to attract and engage students earlier in the year in order to increase numbers next year.

- **RESEA Grant:** Jennifer Bane presented the attached handout, which shows 54 scheduled for their first appointments, and 443 distinct individuals receiving services (highest number of the year). RESEA appointments are still conducted virtually, so services will not be impacted by the change of AJC locations.
- **National Dislocated Worker Grant (DWG):** The attached report shows the funds expended and participants served through June 30th. We enrolled 111 of the 105 training enrollments proposed, and 19 in disaster-relief employment (DRE) exceeding the 18 proposed. We expended over 94% of the funds awarded with only a small amount of DRE funds remaining. The grant has been extended for a year so we submitted a request for additional funds to serve 76 new individuals.
- **Others:** Jennifer Bane provided an update on the below grant opportunities and partnerships:
 - **SNAP E&T/AARP Grant:** We are working with the Greater Memphis (GM) area to increase enrollment for individuals 50 and older in the SNAP Employment & Training program. The attached report shows the proposed goals and outcomes so far. We have a decent amount of money allocated to outreach and are working with UT Extension to conduct focus groups of the target population.
 - **TANF Opportunity Act:** Along with the GM and Southwest areas, we participated as partners under the University of Memphis' grant application. We have been notified that we have been selected for the grant which will begin in November. This is a three-year grant that will expand services to TANF recipients and other low-income individuals and should greatly help with our budget. We proposed to serve 2,500 families across West TN over this 3-year period. Each participant will participate in work readiness curriculum then determine if they are job ready, need training, or starting their own business. Kena Hamm will probably be lead for SW and NW. The project leads from the University of Memphis will be speaking at the upcoming board meeting.
 - **EDA Good Jobs Grant:** Greater Memphis is leading the project which will focus on increasing short-term training credentials, particularly in construction and manufacturing. We hope to hear within the next couple of months whether we have been awarded.

Other Business:

- **Future Meeting Schedule—Time Change:** The group discussed changing the meeting time from 1 pm to 11 am. That would let everyone be finished in half a day. Switching to Tuesdays was also discussed. No one had any objections to the changes.
- **Southwest 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 29th. 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.

Motion to Adjourn: Ronnie Gunnels moved to adjourn the meeting and Jon Dougherty seconded the motion. All were in favor and the motion carried.

Respectfully submitted, Lana Burchfiel
Public Information Specialist

WIOA Title I Targeted Population Summary

Target Group	Total Enrolled	New Enrolled	Received Career Services	Received Training/ Educ Svcs	Total Exited	With Credent
Total	520	27	520	382	1	4
Gender						
Female	240 46.15%	6 22.22%	240 46.15%	165 43.19%	0	0
Male	270 51.92%	21 77.78%	270 51.92%	209 54.71%	1 100.00%	4 100.00%
NA	10 1.92%	0	10 1.92%	8 2.09%	0	0
Age						
18 and Under	111 21.35%	6 22.22%	111 21.35%	48 12.57%	0	0
19 to 24	189 36.35%	9 33.33%	189 36.35%	153 40.05%	0	1 25.00%
25 to 54	196 37.69%	12 44.44%	196 37.69%	169 44.24%	1 100.00%	3 75.00%
55 and Older	24 4.62%	0	24 4.62%	12 3.14%	0	0
Race/Ethnicity						
White	397 76.35%	24 88.89%	397 76.35%	296 77.49%	0	3 75.00%
African American/Black	104 20.00%	2 7.41%	104 20.00%	72 18.85%	1 100.00%	1 25.00%
American Indian/Alaskan Native	5 0.96%	0	5 0.96%	4 1.05%	0	0
Asian	3 0.58%	1 3.70%	3 0.58%	2 0.52%	0	0
Hispanic	15 2.88%	0	15 2.88%	13 3.40%	0	0
Educational Status						
In-school; Secondary School or less	50 9.62%	2 7.41%	50 9.62%	12 3.14%	0	0
In-school; post Secondary School	106 20.38%	3 11.11%	106 20.38%	92 24.08%	0	1 25.00%
Not attending school or Secondary School Dropout	29 5.58%	0	29 5.58%	19 4.97%	0	1 25.00%
Not attending school; Secondary School Graduate or has a recognized equivalent	328 63.08%	22 81.48%	328 63.08%	255 66.75%	1 100.00%	2 50.00%
Not attending school; within age of compulsory school attendance	7 1.35%	0	7 1.35%	4 1.05%	0	0

Veteran						
All Veterans	9 1.73%	2 7.41%	9 1.73%	7 1.83%	0	0
Eligible Veteran Status	9 1.73%	2 7.41%	9 1.73%	7 1.83%	0	0
Other Eligible Person/Veteran Spouse	0	0	0	0	0	0
Campaign Veteran	3 0.58%	0	3 0.58%	3 0.79%	0	0
Disabled Veteran	3 0.58%	1 3.70%	3 0.58%	3 0.79%	0	0
Transitioning Service Member	0	0	0	0	0	0
Recently Separated Veteran	3 0.58%	1 3.70%	3 0.58%	3 0.79%	0	0
Active Duty Military Spouse	0	0	0	0	0	0
Barriers						
Total With Significant Barriers to Employment	348 66.92%	17 62.96%	348 66.92%	232 60.73%	1 100.00%	4 100.00%
Individuals with Disability	50 9.62%	6 22.22%	50 9.62%	20 5.24%	0	0
Displaced Homemaker	0	0	0	0	0	0
Underemployed	140 26.92%	4 14.81%	140 26.92%	120 31.41%	0	0
Dislocation Event	0	0	0	0	0	0
Within 2 Years of Exhausting TANF	0	0	0	0	0	0
Hawaiian Native	0	0	0	0	0	0
Single Parent	47 9.04%	3 11.11%	47 9.04%	38 9.95%	1 100.00%	1 25.00%
Facing Substantial Cultural Barriers	0	0	0	0	0	0
Eligible Migrant and Seasonal Farmworker	0	0	0	0	0	0
Meets Governors Special Barrier	0	0	0	0	0	0
English Language Learner	1 0.19%	0	1 0.19%	1 0.26%	0	0
Basic Skills Deficient	38 7.31%	1 3.70%	38 7.31%	8 2.09%	0	0
Offender	55 10.58%	5 18.52%	55 10.58%	49 12.83%	1 100.00%	3 75.00%
Homeless	2 0.38%	0	2 0.38%	1 0.26%	0	0
Runaway Youth	0	0	0	0	0	0
Foster Care (All)	3 0.58%	0	3 0.58%	1 0.26%	0	0
In Foster Care	2 0.38%	0	2 0.38%	1 0.26%	0	0

Aged Out of Foster Care	1 0.19%	0	1 0.19%	0	0	0
Pregnant or Parenting Youth	26 5.00%	1 3.70%	26 5.00%	15 3.93%	0	0
Out of Home Placement	2 0.38%	1 3.70%	2 0.38%	1 0.26%	0	0
Eligible Under Section 477	0	0	0	0	0	0
Youth Requires Additional Assistance	29 5.58%	1 3.70%	29 5.58%	15 3.93%	0	0
Long-Term Unemployed	151 29.04%	7 25.93%	151 29.04%	95 24.87%	0	0
Public Assistance						
TANF	0	0	0	0	0	0
SNAP	69 13.27%	1 3.70%	69 13.27%	47 12.30%	0	0
Social Security Disability Insurance (SSDI)	1 0.19%	0	1 0.19%	0	0	0
Supplemental Security Income (SSI)	6 1.15%	0	6 1.15%	2 0.52%	0	0
General Assistance	0	0	0	0	0	0
Living in the High Poverty Area	31 5.96%	0	31 5.96%	7 1.83%	0	0
Free or Reduced Lunch	8 1.54%	0	8 1.54%	2 0.52%	0	0
Low Income	245 47.12%	8 29.63%	245 47.12%	166 43.46%	0	3 75.00%
Green Training						
Received Green Training	0	0	0	0	0	0

RE-ENTRY ADVANCED MANUFACTURING PROGRAM (RAMP)

GIBSON COUNTY (Orchard House Apprenticeship) - TCAT Jackson - 1 class					
Male (18 students)	Safety	Quality	Manufacturing	Maintenance	Full CPT
Assessments Passed/Taken	11/11	10/10	5/5	5/5	5/5
Percent Passed Assessment Taken	100%	100%	100%	100%	100%
Percent Passed of 18 Enrolled	61%	56%	28%	28%	28%

<i>Performance Indicator</i>	18	Exclusionary	Employed	Unemployed	Unknown
Exited Participants	14	0	3	2	9
		0%	21%	14%	64%
Active Participants	4	0	0	2	2
		0%	0%	50%	50%
Total Performance		0%	17%	22%	61%

Class began 6/26/2021 @ Orchard House with 18 male students participating

DYER COUNTY (Per Component*) - DSCC					
Male (27 students)	Safety	Quality	Manufacturing	Maintenance	Full CPT
Assessments Passed/Taken	21/24	14/15	14/14	12/13	12/13
Percent Passed Assessment Taken	88%	93%	100%	92%	92%
Percent Passed of 27 Enrolled	78%	52%	52%	44%	44%

<i>Performance Indicator</i>	27	Exclusionary	Employed	Unemployed	Unknown
Exited Participants	9	2	6	1	0
		22%	67%	11%	0%
Active Participants	18	0	2	12	4
		0%	11%	67%	22%
Total Performance		11%	30%	48%	15%

**students are added on a self-paced structure with multiple entry points*

NW Apprenticeship Grant (revised per state request)

Employer	First Year	Second Year	Cost
Amteck (Dyer Co)	10	0	\$ 24,321.00
Auston Mealer (Dyer Co)	4	0	\$ 10,000.00
Hamilton Ryker Talent Gro	8	0	\$ 20,000.00
Charter Senior Living (Paris)			
Signature Healthcare (Ridgely)			
Tencom (Dyer)	2	0	\$ 5,000.00
Thor Boats (Obion)	4	0	\$ 10,000.00
Trenton Light and Water (Gibson)	5	0	\$ 12,500.00
	33	0	\$ 81,821.00

\$2,432.10 each for budget purposes

\$2,500 each

Registered Electrical Apprenticeship Preparation Program (REAP) Report

2022 Program Updates	
Event	Date
Amteck Preparation Meeting	January 21, 2022
Milan High School Showcase	February 18, 2022
Banner Posted at Amteck	March 1, 2022
Lake County High School Showcase	March 3, 2022
Gibson County High School Showcase	March 9, 2022
Dyersburg High School Showcase	March 11, 2022
Obion County High School	March 14, 2022
Trenton Peabody High School Showcase	March 18, 2022
Crockett County High School Showcase	April 6, 2022
Union City High School	April 11, 2022
Dyer County High School Showcase	April 13, 2022
Humboldt High School Showcase	n/a
South Fulton High School Showcase	n/a
South Gibson County High School Showcase	declined
Amteck Promotional Blast	ongoing
Social Media Outreach	ongoing
Emails to Unemployment Claimants	Weekly
Shock & Awe Day	April 30, 2022
Two-Week Pre-Apprenticeship	June 13 - 24, 2022

Results from Previous Years					
	2019	2020	2021	Total	Percentage
Enrolled	11	10	7	28	100%
Completed Classroom Training	8	5	5	18	64%
Exited	11	10	5	26	93%
Active	0	0	1	1	4%
Employed	11	9	6	26	93%
Employed with Amteck	4	3	5	12	43%
Unemployed	0	1	1	2	7%

**tracking complete for 2019 & 2020*

2022 Class		
	2022	Percentage
Enrolled	4	100%
Completed Classroom Training	3	75%
Exited	0	0%
Active	4	100%
Employed	2	50%
Employed with Amteck	1	25%
Unemployed	2	50%

Services Provided Individuals - RESEA Services
July - September 2022

Activity/Description	Distinct Users	Total	% of Total
190 - First Scheduled RESEA	90	90	6.53%
191 - RESEA Reschedule	18	18	1.31%
192 - RESEA Failed to Report	55	58	4.21%
193 - RESEA Placement	22	22	1.60%
194 - RESEA Exempt	11	11	0.80%
195 - RESEA UI Eligibility	220	444	32.20%
196 - RESEA Subsequent Schedule	178	178	12.91%
197 - RESEA Subsequent Completed	178	212	15.37%
198 - RESEA Program Completed	123	123	8.92%
592 - RESEA Referred to Reemployment	168	168	12.18%
593 - RESEA Referred to Training	10	10	0.73%
19A - RESEA Compliant	21	22	1.60%
19R - RESEA Referred to Title I	21	21	1.52%
19E - RESEA Enrolled in Title I	2	2	0.15%
Activity/Description	Total Users	Total Services	% of Total
	1,117	1,379	100%

National Dislocated Worker Grant (DWG) Report

Budget Category	Budget as of 6/30/2022	Balance as of 6/30/2022	Additional Request (originally submitted 1/21/22)	½ of Tornado Request (DRE moved to Training)	New Contract Request - 7/1/22	Total NDWG Funding
Disaster-Relief Emp. (DRE)*	\$224,532.35	\$15,849.00	\$0.00	\$0.00	\$15,849.00	\$224,532.35
Training & Supportive Services	\$238,700.00	\$0.00	\$77,317.31	\$145,366.14	\$222,683.45	\$461,383.45
Career Services (Program Staff)	\$263,767.65	\$0.00	\$128,982.69	\$70,542.95	\$199,525.64	\$463,293.29
Program Total	\$727,000.00	\$15,849	\$206,300	\$215,909.09	\$438,058.09	\$1,149,209.09
Admin. Costs	\$80,777.78	\$1,761.02	\$22,922.22	\$23,989.88	\$48,673.12	\$127,689.88
Total Contract	\$807,777.78	\$17,610.02	\$229,222.22	\$239,898.97	\$486,731.21	\$1,276,898.97

*Note: once allowed, a request will be made to move the \$15,849 in DRE to Career & Training instead since all current DRE participants have completed and no new enrollments are anticipated.

The new funds will support an additional 76 enrollments, totaling 206 to be served by NW across all the DWG contracts:

Service	Proposed Number to Serve	Actual Number Served as of 6/30/2022	Proposed to Serve 7/1/22 – 6/30/23	Total Served (all NDWG contracts)
Disaster-Relief Employment	18	19	0	19
Training Services*	105	111	76	187
Total Unique Enrollments	123	130	76	206
Supportive Services (not unique enrollments)	57	38	13	51
Total Duplicated Enrollments	180	168	89	257

*Note: Two of the 19 enrolled in DRE also enrolled in training, making the total number receiving training services to date 113.

**SNAP E&T 50+ Technical Assistance Project with Greater Memphis
AARP Foundation & Seattle Jobs Initiative
December 2021 – March 2023**

Project Overview

To build on this opportunity, AARP Foundation, in collaboration with SJI, is launching the SNAP Employment & Training 50+ Technical Assistance Project, with the goal of significantly increasing the number of workers aged 50+ who are engaged in effective SNAP E&T services leading to employment and to pave the way for SNAP E&T providers to incorporate strategies to better serve 50+ workers and to continue to increase access to SNAP E&T. In this 20-month project, participating Teams consisting of SNAP E&T provider collaboratives from different States will receive training, technical assistance, funding, outreach and data collection support to design and implement scalable and sustainable SNAP E&T program strategies aimed at connecting more older workers to SNAP E&T services, including short-term training (less than one year) opportunities, that will lead to employment.

Deliverables & Outcomes

Deliverable	Goal	Jan. – Mar.	April – June	July – Sept.	Total	Remaining
New Enrollments	50	19	9	7	35	15
Referred to Short-Term Training	25	14	5	1	20	5
Enrolled in Short-Term Training	20	14	5	1	20	0
Any Component Completion	12	0	0	4	4	8
Training Completion	6	0	0	0	0	6
Enter Employment	14	0	0	0	0	14
Average Starting Hourly Wage	\$10	n/a	n/a	n/a	n/a	n/a

PROJECT OVERVIEW

Opportunity Now! (ON!) is a regional strategy, led by the Mid-South Center for Occupational Innovation (MCOI), designed to create economic mobility for adult and youth learners in the mid-south. Through ON!, MCOI will establish three one-stop Accelerated Skills Training (AST) Centers serving East Arkansas, North Mississippi, and West Tennessee.

ON! AST Centers will deliver rapid credentialing opportunities through programs of the same quality as traditional education models, but in less time – four to 24 weeks. Three sectoral partnerships, each led by a backbone organization representing the area's high-growth advanced manufacturing, logistics technology, and construction sectors have been created, formalizing alignment across regional boundaries and state lines and creating the optimal ecosystem for job seekers and employers.



Through sectoral partnerships, stakeholders are coming together to create efficient, effective, stackable, and portable credentialing programs designed to address the unique needs of participants, meet the employer's skills needs, fill anticipated vacancies for high-paying jobs, and combat the region's economic stagnation, creating greater economic mobility and growth. Sectoral partnerships allow us to unify efforts and leverage resources to attain the most impactful outcomes, which will permanently change the economic future for thousands across the mid-south.

Employers will directly partner with learning institutions to create skill based curriculum that align to individual competency modules. Modules will be universal across employers and transfer to academic credit at partner institutions so learners can continue to build skills over a career.

Through the collective ON! strategy, we will train over 1,860 students during the implementation phase, growing to serve 10,000 students over ten years, with an anticipated economic impact of \$2.51 billion. Enrolled learners, specifically high-barrier individuals, will have at least an 85% completion rate with an employment rate higher than 90% within 90 days of completion.



2360 | New Hires Committed



295 | Employer Partners



**1860 | Learners in 24 months;
10,000 over 10 years**



36 | Counties across 3 states

Project Deliverables

System Development:

- Hire Project leadership to manage all aspects of the program, particularly in coalition building and tracking of metrics as noted in the NOFO.
- Establish an official Project Team of partner organizations, employer, and stakeholders who agree to a shared responsibility for creating a formalized project structure.
- Execute MOU defining commitments during Phase 1, structure, governance and decision-making among partners.
- Produce three town hall public forums to discuss current challenges to upskilling and training opportunities available within the region.
- Hold employer meetings across the tri-state region to determine skills needed.
- Create Failure Modes Effects Analysis and Root Cause Analysis of the disconnect between the accessibility of upskilling opportunities and the current labor workforce.
- Name MCOI Board and Sector Councils.
- Create Process Map and Project Milestone Chart for use in Phase 2.
- Travel to other successful AST programs to do in-depth best practices meetings.
- Identify rented space for operations of Accelerated Training Centers.
- Obtain written commitments from each partner for Phase 2 activities.

Program Design:

- Secure leases on rented training spaces.
- Hire Sector Coordinators to lead process development under the direction of MCOI.
- Host 40 hours of curriculum calibration workgroups (employers, education, worker representation) to identify skills needed for each program track and occupational credential associated with that identified skill. Define/name each "block" and determine which blocks are needed in which stack. Produce official "stack" for each program track.
- Align programs of study "stacks" to employers and sector councils who will oversee the implementation and ownership.
- Determine educational partners responsible for "stacks" at each location.
- Execute formal employer commitments.
- Secure leases on physical training spaces.
- Validate equipment needs for implementation and order equipment.
- Secure local funding to fill any anticipated gaps for equipment purchases.
- Draft marketing plan for raising awareness of the initiative region-wide and begin outreach campaign.
- Build community engagement strategy guided by equity and access.
- Secure curriculum approvals from credentialing bodies when applicable.

Program Implementation:

- Conduct media and outreach to under-served, high opportunity communities.
- Complete final permitting checks, licenses, and approvals for each AST location.
- Begin enrollment of learners and instruction of programs. (Metric of performance specific to participants included separately.)
- Sector councils meet monthly to gauge program implementation successes and challenges, recalibrating as needed.
- Quarterly stakeholder workgroup to discuss the larger project plan and implementation. Report out on engagements, enrollments, completions, and hires to continuously refine the most effective processes.
- Incorporate data collection practices (i.e., wage growth) pre- and post-training.
- Formalize sustainability model with public / private support and commitments.



PHASE	BUDGET	DATE
Phase 1: System Design	\$368,230	3-6 Months
Phase 2: Program Design	\$5,826,085	6 Months
Phase 3: Program Implementation	\$15,624,586	24 Months

Direct Service Program Goals

BENCHMARK	IMPLEMENTATION	10 YEAR GOAL
Enrollments over 2.3 years	1,860	11,765
Enrollment meeting low-income definition	1,097	7,059
Enrollment of Opportunity Youth	600	3,530
85% ATC program completion rate	1,554	10,000
90% employment for ATC completers within 90 days	1,399	9,000
Distinct individuals receiving at least one credential (93%)	1,682	10,941
Distinct individuals completing an ASP	1,554	10,000
Placements	1,682	10,500
# of individuals completing an ASP and entering employment in field 90 days	1,399	9,000
# of individuals moving from \$0-\$14.99 to \$15+ (\$16,120 annual gain/per)	340 (\$5,480,800 wage gain)	2,000 (\$32,240,000 wage gain)
# of individuals moving to \$18+ (\$22,360 annual gain per)	850 (\$19,006,000 wage gain)	5,000 (\$111,800,000 wage gain)
# of individuals moving to \$21+ (\$28,600 annual gain per)	510 (\$14,586,000 wage gain)	3000 (\$85,800,000 wage gain)
# of employers engaged through sector councils	100	150
# of distinct employers directly hiring ASP completers	150	200

GROWTH

GROWING RELATIONAL AND OCCUPATIONAL WEALTH IN WEST TENNESSEE HOUSEHOLDS

Elevating West Tennessee families into self-sufficiency and economic mobility by respecting their voice and choice

www.memphis.edu/growth

1

WHAT IS GROWTH?

GROWTH

Grant funded by the Tennessee Department of Human Services and Families First, the state's **Temporary Assistance for Needy Families (TANF)** program, in the amount of \$25,000,000 to improve outcomes for West Tennessee's low-income families by **eliminating key barriers to self-sufficiency**.

Community partnership led by the University of Memphis in collaboration with 3 regional workforce boards and several community organizations to:

- implement a **holistic approach** to improving the personal and professional well-being of West Tennessee low-income families
- inspire families to appreciate the **value of growth and lifelong learning**
- **strengthen the existing system** through partner resources
- improve family **access to needed resources** for economic mobility



2

WHO WE WILL SERVE

GROWTH

2,500 West Tennessee low-income families

Robust ecosystem will offer access through 100+ sites throughout the region:

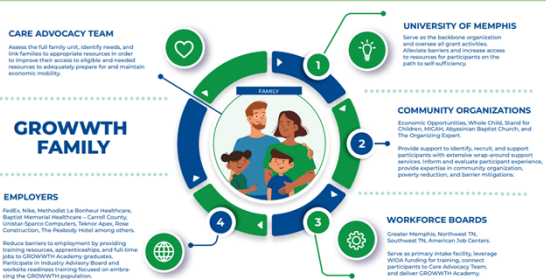
- American Job Centers
- Community Organizations
- University of Memphis campuses



3

WHAT WE WILL OFFER

GROWTH



4

PROGRAMS (launched to public in January 2023)

GROWTH

- GROWTH Academy (3-week work readiness training)
- Accelerated Skills Training
- Childcare Training
- Microbusiness Development Program
- Supportive Services
(childcare, transportation, family wellness)
- Transitional Jobs
- Employer Readiness Training



5

Eligible Training Provider List (ETPL) Program Renewals

Provider Name	ProgramTitle	Completion Level	Overall Completion Rate	Overall Employment 2nd QTR after Exit	WIOA Total Enrolled	WIOA Completion Rate*	Overall Employment 2nd QTR after Exit*	Occupation Title	2022 Jobs	2026 Jobs	2022 -2026 Change	Annual Openings	Avg. Hourly Earnings
<u>AMTECK - APPRENTICESHIP</u>	Electrical Contractor Registered Apprenticeship	A certificate of completion of an apprenticeship	Registered Apprenticeship Program - Performance Tracked by USDOL.					Electrician	327	328	1	36	\$ 24.35
<u>BETHEL UNIVERSITY</u>	Pharmacy Technician	An industry-recognized certificate or certification	100%	0%	2	0%	0%	Pharmacy Technician	329	329	0	25	\$ 16.50
<u>DSCC</u>	CERTIFIED CLINICAL MEDICAL TECHNICIAN (CCMA)	An industry-recognized certificate or certification	0%	0%	0	0%	0%	Clinical Laboratory Technologist and Technician	103	100	-2	7	\$ 23.52
<u>DSCC</u>	Healthcare Technician	An industry-recognized certificate or certification, A community college certificate of completion, Employment	0%	0%	0	0%	0%	Medical Assistant	267	259	-8	32	\$ 15.24
<u>Roadrunner Driving School, LLC</u>	Truck Driving	An industry-recognized certificate or certification	98%	48%	100	90%	67%	Heavy and Tractor Truck Drivers	2,290	2,384	95	283	\$ 22.75
<u>TCAT AT MCKENZIE</u>	ADMINISTRATION OFFICE TECHNOLOGY	An industry-recognized certificate or certification	75%	65%	16	53%	87%	Executive Secretary and Executive Administrative Assistant	99	92	-7	11	\$ 26.87
<u>TCAT AT MCKENZIE</u>	AUTOMOTIVE TECHNOLOGY	An industry-recognized certificate or certification	33%	67%	7	33%	100%	Automotive Service Technician and Mechanic	609	635	26	68	\$ 19.13
<u>TCAT AT MCKENZIE</u>	HVAC/REFRIGERATION	An industry-recognized certificate or certification	75%	50%	23	61%	67%	HVAC Mechanics and Installers	231	245	14	27	\$ 21.13
<u>TCAT AT MCKENZIE</u>	INDUSTRIAL MAINTENANCE INTERGRATED INFORMATION	An industry-recognized certificate or certification	95%	32%	8	86%	86%	Industrial Machinery Mechanics	245	285	41	32	\$ 24.48
<u>TCAT AT MCKENZIE</u>	TECHNOLOGY SYSTEMS MANAGEMENT	An industry-recognized certificate or certification	53%	60%	19	40%	60%	Computer and Information Systems Manager	76	84	8	8	\$ 52.12
<u>TCAT AT MCKENZIE</u>	MACHINE TOOL TECHNOLOGY	An industry-recognized certificate or certification	70%	20%	6	40%	40%	Machinist	376	415	39	49	\$ 20.54
<u>TCAT AT MCKENZIE</u>	Major Appliance Repair	An industry-recognized certificate or certification	0%	0%	0	0%	0%	Home Appliance Repairer	12	12	0	1	\$ 17.78
<u>TCAT AT MCKENZIE</u>	WELDING TECHNOLOGY	An industry-recognized certificate or certification	84%	27%	14	55%	91%	Welders, Cutters, Solders, and Brazers	459	505	46	62	\$ 20.99
<u>TCAT AT PARIS</u>	ADMINISTRATIVE OFFICE TECHNOLOGY	An industry-recognized certificate or certification, Employment, A measurable skills gain leading to a credential, A measurable skills gain leading to employment	79%	21%	8	57%	43%	Executive Secretary and Executive Administrative Assistant	99	92	-7	11	\$ 26.87

<u>TCAT AT PARIS</u>	COLLISION REPAIR TECHNOLOGY	An industry-recognized certificate or certification, A certificate of completion of an apprenticeship, Employment	38%	0%	4	50%	0%	Automotive Body and Related Repairers	116	118	2	12	\$ 20.58
<u>TCAT AT PARIS</u>	HEALTH INFORMATION MANAGEMENT TECHNOLOGY	An industry-recognized certificate or certification, A secondary school diploma or its equivalent, Employment, A measurable skills gain leading to a credential, A measurable skills gain leading to employment	75%	50%	9	63%	75%	Medical Records Specialist	78	74	-4	6	\$ 17.87
<u>TCAT AT PARIS</u>	INDUSTRIAL MAINTENANCE	An industry-recognized certificate or certification, A secondary school diploma or its equivalent, Employment, A measurable skills gain leading to a credential, A measurable skills gain leading to employment	31%	0%	5	0%	0%	Maintenance Workers, Machinery	251	262	11	26	\$ 27.43
<u>TCAT AT PARIS</u>	INFORMATION TECHNOLOGY SYSTEMS MANAGEMENT	An industry-recognized certificate or certification, A secondary school diploma or its equivalent, Employment, A measurable skills gain leading to a credential, A measurable skills gain leading to employment	71%	12%	4	0%	67%	Computer and Information Systems Manager	76	84	8	8	\$ 52.12
<u>TCAT AT PARIS</u>	MACHINE TOOL TECHNOLOGY	An industry-recognized certificate or certification, Employment, A measurable skills gain leading to employment	71%	0%	4	25%	0%	Machinist	376	415	39	49	\$ 20.54
<u>TCAT AT PARIS</u>	MOTORCYCLE AND A.T.V. REPAIR	An industry-recognized certificate or certification, Employment, A measurable skills gain leading to employment	50%	0%	1	0%	0%	Motorcycle Mechanic	14	15	2	2	\$ 17.27
<u>TCAT AT PARIS</u>	Outdoor Power Equipment	An industry-recognized certificate or certification, A secondary school diploma or its equivalent, Employment, A measurable skills gain leading to a credential	0%	0%	0	0%	0%	Electric Power-Line Installers and Repairers	156	166	10	16	\$ 28.91
<u>TCAT AT PARIS</u>	PRACTICAL NURSING (FULL TIME)	An industry-recognized certificate or certification, A license recognized by the State involved or the Federal Government, Employment, A measurable skills gain leading to a credential, A measurable skills gain leading to employment	71%	67%	98	58%	79%	Licensed Practical Nurse	947	923	-24	72	\$ 19.44

<u>TCAT AT PARIS</u>	PRACTICAL NURSING (PARTTIME)	An industry-recognized certificate or certification, A license recognized by the State involved or the Federal Government, Employment, A measurable skills gain leading to employment	29%	100%	15	29%	100%	Licensed Practical Nurse	947	923	-24	72	\$	19.44
<u>TCAT AT PARIS</u>	RESIDENTIAL BUILDING MAINTENANCE	An industry-recognized certificate or certification, Employment, A measurable skills gain leading to a credential, A measurable skills gain leading to employment	79%	7%	1	100%	100%	Carpenter	572	586	13	57	\$	21.84
<u>TCAT AT PARIS</u>	Welding	An industry-recognized certificate or certification	55%	0%	1	0%	0%	Welders, Cutters, Solders, and Brazers	459	505	46	62	\$	20.99
<u>TCAT Northwest</u>	AUTOMOTIVE TECHNOLOGY	An industry-recognized certificate or certification	75%	38%	9	29%	86%	Automotive Service Technician and Mechanic	609	635	26	68	\$	19.13
<u>TCAT Northwest</u>	Computer Information Technology	An industry-recognized certificate or certification	100%	0%	0	0%	0%	Computer User Support Specialist	124	133	9	12	\$	21.92
<u>TCAT Northwest</u>	Diesel Powered Equipment Technology	An industry-recognized certificate or certification	93%	75%	27	54%	88%	Bus and Truck Mechanic and Diesel Engine Specialist	219	238	18	25	\$	20.38
<u>TCAT Northwest</u>	DRAFTING CAD TECHNOLOGY	An industry-recognized certificate or certification	0%	67%	2	0%	100%	Mechanical Drafters	33	34	1	4	\$	26.75
<u>TCAT Northwest</u>	HEATING, VENTILATION, AIR CONDITIONING/REFRIGERATION	An industry-recognized certificate or certification	65%	35%	14	36%	50%	HVAC Mechanics and Installers	231	245	14	27	\$	21.13
<u>TCAT Northwest</u>	INDUSTRIAL MAINTENANCE	An industry-recognized certificate or certification	70%	38%	20	61%	78%	Maintenance Workers, Machinery	245	285	41	32	\$	24.48
<u>TCAT Northwest</u>	Industrial Maintenance/Molding	An industry-recognized certificate or certification	100%	33%	4	50%	100%	Industrial Engineering Technologists	48	52	4	6	\$	23.28
<u>TCAT Northwest</u>	Industrial Maintenance-Evening	An industry-recognized certificate or certification, Employment, A measurable skills gain leading to a credential, A measurable skills gain leading to employment	17%	0%	0	0%	0%	Maintenance Workers, Machinery	251	262	11	26	\$	27.43
<u>TCAT Northwest</u>	MACHINE TOOL TECHNOLOGY	An industry-recognized certificate or certification	100%	67%	9	78%	89%	Machinist	376	415	39	49	\$	20.54
<u>TCAT Northwest</u>	PRACTICAL NURSING	An industry-recognized certificate or certification, A license recognized by the State involved or the Federal Government	74%	85%	102	58%	86%	Licensed Practical Nurse	947	923	-24	72	\$	19.44
<u>TCAT Northwest</u>	PRACTICAL NURSING (EVENING/WEEKENDS)	An industry-recognized certificate or certification, A license recognized by the State involved or the Federal Government	53%	95%	42	48%	95%	Licensed Practical Nurse	947	923	-24	72	\$	19.44

<u>TCAT Northwest</u>	TRUCK DRIVING	An industry-recognized certificate or certification, A license recognized by the State involved or the Federal Government	94%	0%	2	100%	100%	Heavy and Tractor Truck Drivers	2,290	2,384	95	283	\$ 22.75
<u>TCAT Northwest</u>	WELDING	An industry-recognized certificate or certification	82%	33%	20	56%	94%	Welders, Cutters, Solders, and Brazers	459	505	46	62	\$ 20.99
<u>UT Martin</u>	CELL & MOLECULAR BIOLOGY	A baccalaureate degree	0%	0%	0	0%	0%	Biological Technician	13	13	0	2	\$ 20.50
<u>UT Martin</u>	MECHANICAL ENGINEERING	A baccalaureate degree	0%	0%	0	0%	0%	Mechanical Engineer	79	96	17	9	\$ 39.94
<u>UT Martin</u>	VETERINARY SCIENCE & TECHNOLOGY	An associate degree	0%	0%	0	0%	0%	Veterinary Assistant	58	63	5	11	\$ 13.07
<u>UT Martin</u>	VIDEO GAME DESIGN	A measurable skills gain leading to a credential, A measurable skills gain leading to employment	0%	0%	0	0%	0%	Web and Digital Interface Designers	12	14	2	1	\$ 28.05

*2020 - 2021 performance data has not been added and discrepancies are noted in available data. TDLWD guidance received:
 We have received some information on why the discrepancies are appearing in the example below. There are a lot of complexities here and I am happy to jump on a call to discuss at any time. One thing I will point out is that the system uses SSNs submitted by the ETP to match to WIOA cases in the system. When a SSN match is made between a training participant and a WIOA case file the information in the WIOA case file trumps information submitted by the ETP. A quick example:

An ETP submits an annual performance report that a student (with a legitimate SSN) completed their training and exited 5/6/2022 BUT the student's WIOA case file is ongoing (they are co-enrolled or perhaps received additional support related to job search, etc.) the case is not yet closed. The system will default to the WIOA case status which remains open, therefore the performance report generated by VOS will not reflect that the student has exited (thus skewing the numbers). While they, in fact, exited the ETPL training they have not completely exited the system.

There are several nuances like this that are impacting the performance data. As a result, we suggest using other means outside of VOS to evaluate provider performance at this time. Suggestions include but are not limited to Division of Postsecondary State Authorization (DPSA) sites, state authorizing agencies, and other information gathered locally about ETP successes/challenges.

Proposed Policy Revisions – Northwest Outreach & Opportunities 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
Grievance and Complaint Resolution	<ol style="list-style-type: none"> 1. Adds language for whom information must be provided and how it is provided; 2. adds detail to complaint information required. 	11/15/22	<ol style="list-style-type: none"> 1. Changes entire Grievance and Complaint process to NW Board policy (as revised to add SW sections as noted). 	8/23/22	SW current policy allowed complaints to be filed with TDLWD, Service Provider and OSO, versus Board only.
Training Provider Approval	<ol style="list-style-type: none"> 1. Adds detail versus referring to State policy for provider eligibility; 2. Adds criteria for being a program of training; 3. Adds section on ETPL exceptions; 4. Adds section on registered apprenticeships; 5. Adds section on Reciprocal Agreement; 6. Adds section on third-party providers; 7. Adds section on making changes to program info; 8. Adds review periods to subsequent eligibility section; 9. Adds section on failure to meet subsequent eligibility; 10. Adds request for removal section; 11. Adds reasons for denial under appeal process; 12. Adds dissemination & access section; 13. Adds participant selection section; 14. Adds data validation section. 	11/15/22	<ol style="list-style-type: none"> 1. Removes details of State ETPL Approval process, instead refers to website. 2. Changes <u>entire</u> approval and appeal process to NW Board policy (as revised to add SW sections noted); 3. Adds section on Monitoring. 	8/23/22	Only added provisions related to LWDB action or necessary knowledge. Did not add details of State actions that can be found on website. Updated to reflect current state policy.
Priority of Service	<ol style="list-style-type: none"> 1. Changes re-entry services to “justice involved individuals”. 2. Adds information on target percentages for priority populations. 	11/15/22	<ol style="list-style-type: none"> 1. Removes “background” section which reads incorrectly 2. Adds section for “Point of Entry” priority for veterans and eligible spouses 	8/23/22	Corrects language and definitions that are in conflict with WIOA regulations and adds

			<ol style="list-style-type: none"> 3. Clarified 3rd Priority must meet Title I Adult eligibility. 4. Adds Self-Sufficiency eligible adults under Priority Group #4 versus considered low income. 5. Adds table of barriers and required documentation 6. Adds Percentage requirement (75%) who must meet priority group #1 & #2 7. Changes low income definition to correspond to the law (removes self-sufficiency eligibility) 8. Changes low income definition to correspond to law (adds eligible for free or reduced price lunch...) 9. Adds provision for enrolling 18 or older youth as an adult without additional eligibility if completed in last 6 months. 10. Clarifies Basic Skill Deficient eligibility must be documented by reliable assessment and must be included in participant file. 		additional language for clarity.
Veterans and Eligible Spouse Priority of Services	1. Added clarification of when to verify veteran status using LB-1118	11/15/22		10/27/22	No material changes.
Youth Eligibility	<ol style="list-style-type: none"> 1. Updates poverty data. 2. Adds additional barrier to “requires additional assistance” criteria for attending or has been enrolled in alternative school. 3. Adds additional barrier to “requires additional assistance” criteria for involved in gang activity 4. Adds additional barrier to “requires additional assistance” criteria for lacks work experience or credential required for in demand occupation for 	11/15/22	<ol style="list-style-type: none"> 1. Expands language for eligibility criteria for out-of-school youth to include “exact” wording of WIOA. 2. Expands language for eligibility criteria to in-school youth to include “exact” wording of WIOA. 3. Expands wording on citizenship/authorized to work and selective service 4. Adds section on documentation of participant eligibility 5. Adds section on determining school status 	10/27/22	<p>General policy is very “basic” with no specifics or definitions.</p> <p>Low income language has 2 errors – LLSIL should be 70%, not 65/75% (in language) or 165/175% (in referenced chart). Appears to be referencing self-sufficiency guidelines versus LLSIL.</p>

	which training is necessary and will be provided.		<ol style="list-style-type: none"> 6. Expands language on determining and documenting basic skills deficiency 7. Replaces inaccurate language regarding LLSIL family income to determine low income eligibility. 8. Replaces inaccurate language regarding free/reduced lunch to determine low income eligibility 9. Adds section on determining low income based on youth living in high-poverty area. 10. Adds section on documentation to calculate family income which provides expanded language to the Chart included. 11. Expands “requires additional assistance” definition by adding 20 additional barriers. 		<p>Low income language includes error in free/reduced lunch using term <u>received</u> versus <u>receives</u>.</p> <p>NW policy includes AREA SPECIFIC LMI, statistical evidence and other data to support the Needs Additional Assistance Definition. (see highlighted areas in policy) SW policy does not. Similar data will need to be included in SW Policy before adopted.</p>
Youth Program Design & Incentives	Changes reference from NW TN Workforce Board to Local Workforce Development Board.	11-15-22	<ol style="list-style-type: none"> 1. Adds a Youth Program Design Policy in its entirety in absence of SW policy. 2. Expands additional categories of incentives with same or greater amounts originally covered in the Support Services policy 	10/27/22	<p>SW does not have a Youth Program Design policy on their website. Incentives are covered in their support policy, but will be moved to this one.</p> <p>The policy was approved 2-22-22. The only change is changing NW to LWDB</p>

Grievance and Complaint Resolution

Effective Date: November 15, 2022

Duration: Indefinite

Purpose: To establish a complaint and grievance policy for participants and other interested parties to address alleged violations of the requirements of Title I of the WIOA.

Policy: The ~~Northwest Tennessee~~ Local Workforce Development Board (LWDB) Grievance and Complaint resolution is as follows:

Information will be provided regarding the content of the grievance and complaint procedures required by this guidance to participants and other interested parties affected by the local workforce development system (20 CFR 683.600). Each sub-recipient of funds under Title I of WIOA will provide information about the content of the grievance and complaint procedures required by this guidance to participants and other interested parties affected by the local workforce development system, including One-Stop partners and service providers (20 CFR 683.600). Reasonable efforts will be made to assure that the information provided will be understood by the affected participants including youth and those with limited English-speaking ability (29 CFR 37.35). One-on-one assistance is available for individuals with disabilities when necessary. All processes regarding grievance and complaint procedures will be made available in hard copy and posted on the LWDB website. Procedures will be posted and accessible in all American Job Center offices. All contracts, plans, and agreements will contain equal opportunity policies including, but not limited to a) Provision of equitable services across all substantial population segments; and b) Programmatic and physical access will be provided to those with physical, mental, or sensory disabilities.

Non-Discriminatory Complaints

This complaint procedure is limited to complaints and/or grievances that are non-discriminatory in nature, such as unjust denial of WIOA services that are not discriminatory in nature, hostile work environment experienced during participation in a WIOA-funded program, other complaints against employers that relate to a WIOA-funded program, and complaints made by staff within the Local Workforce Development Area (LWDA) against either other staff or against a sub-recipient entity. This procedure applies to staff, program participants, applicants, service/training providers, and other interested parties. In cases where discrimination is alleged, a different process is used, and the LWDA's Equal Opportunity Officer handles the complaint. Complaints made by LWDA staff against other LWDA staff or a sub-recipient entity may also follow the procedures prescribed by the Employer of Record for Staff to the Board, Partners and Providers.

Informal procedures and a hearing will be initiated to resolve the applicant/participant's complaint within 60 days. If these procedures do not resolve the issue to the applicant/partisan's satisfaction, the Executive Director will advise the individual of the formal complaint procedure as follows:

- 1) All complaints must be submitted in writing to the Executive Director at the ~~Northwest Tennessee Workforce Board~~ Workforce Innovations, Inc. in the form of a letter via certified U.S. Mail to:
Executive Director, 208 N. Mill Ave. Dyersburg, TN 38024.
- 2) All complaints must include:
 - Name and address of complainant.
 - The identity of the individual or entity that the complainant alleges is responsible;
 - A description of the allegations in enough detail to allow an initial determination, establish jurisdiction, encourage timeliness, and determine the apparent merit of the complaint, including any supporting documentation;
 - Settlement or corrective action desired by complainant;
 - If there are any witnesses, their names and contact information are included; and
 - Date of the incident (or time frame, if there is an occurrence over a period of time), and date of filing;

- Describe attempts to resolve the issue of complaint;
 - **The complainant's signature or the signature of the complainant's authorized representative.**
 - Complaints must be submitted within 180 days of the date of the incident.
- 3) The Executive Director will provide written acknowledgement of receipt of complaint to complainant.
 - 4) The Executive Director will launch an investigation.
 - 5) The Executive Director will hold a formal verbal discussion with complainant within fifteen (15) working days of receipt of complaint.
 - 6) The Executive Director will communicate a written decision to the complainant within ten (10) working days of the verbal discussion.
 - 7) Should the complainant not be satisfied, the complainant may file a written appeal, prepared consistent with item #2 above, with the Board Chairman.
 - 8) Upon receipt of an appeal, the Chairman will convene an ad hoc committee to review the appeal. The hearing will be limited to the original complaint and the complainant can choose to be represented by another individual, including legal counsel.
 - 9) The committee will render a written decision to the complainant within five (5) working days of the hearing. If more time is required to reach a decision, the complainant will be notified in writing of the time by which a decision will be made.
 - 10) For issues covered under this procedure, the decision of this committee may be appealed to the Tennessee Department of Labor and Workforce Development (TDLWD). If a decision has not been made within sixty (60) days, an appeal may also be made to the TDLWD.
 - 11) Copies of all appeals will be forwarded to the Tennessee Department of Labor and Workforce Development.
 - 12) All files pertaining to complaints will be maintained not less than five (5) years and will be available to all federal and state monitors.
 - 13) An individual party to a collective bargaining agreement, alleging a labor standards violation, may also submit the grievance to a binding-arbitration procedure.

The Executive Director must maintain documentation throughout the complaint process which must include, at a minimum, the Employment and Training Administration (ETA) Complaint/Apparent Violation Form, correspondence related to the complaint, and meeting minutes regarding any in-person adjudication between LWDA staff and the complainant, if applicable.

Hostile Work Environment Complaints, Unrelated to American Job Center Staff

The One-Stop Operator (OSO) must ensure complaints alleging a hostile work environment or other unfair treatment by an employer are appropriately forwarded to either the Labor Standards Unit or the Tennessee Occupational Safety and Health Administration (TOSHA).

- A. Complaints to the Labor Standards Unit: inspections of child-labor and non-smoker protection, claims for unpaid wages, and investigations of allegations of unlawful hiring practices related to illegal aliens and whether workers are lawfully authorized to work.

More information can be accessed through the following link:

<https://www.tn.gov/workforce/employers/safety---health/regulationscompliance/regulations---compliance-redirect/labor-standards-unit.html>

- B. Complaints to TOSHA: inspections of possible existence of safety and health hazards.

More information can be accessed through the following link:

<https://www.tn.gov/workforce/employees/safety-health/tosha-redirect/file-a-safetycomplaint.html>

The OSO must assist the complainant to file a complaint with the organizations listed above, to include follow up with the customer to confirm that transfer between organizations. This process must be reflected in AJC Complaint Log and documentation must be maintained at the AJC.

Discriminatory Complaints

The Workforce Innovation and Opportunity Act must comply with Title VI and VII of Civil Rights Act of 1964, Title IX of the Education Amendment of 1972, section 504 of the Rehabilitation Act of 1973, Executive Order 11, 246 and the related regulations to each. The ~~Northwest Tennessee Workforce Board (NWTNWB)~~ Local Workforce Development Board (LWDB) assures that it will not discriminate against any individual because of race, religion, creed, color, sex, age, disability, national origin, political affiliation, or belief. Additionally:

- It is against the law for the ~~NWTNWB~~, LWDB, a recipient of Federal financial assistance, to discriminate on the following basis;
- Against any individual in the United States, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief; and
- Against any beneficiary of programs financially assisted under Title I of the Workforce Innovation and Opportunity Act (WIOA) on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his/her participation in any WIOA Title I - financially assisted program or activity.

The ~~NWTNWB~~ LWDB must not discriminate in any of the following areas:

- Deciding who will be admitted, or have access, to any WIOA Title I financially assisted program or activity;
- Providing opportunities in, or treating any person with regard to, such a program or activity; or
- Making employment decisions in the administration of, or in connection with such a program or activity.

Further, the ~~NWTNWB~~ LWDB agrees to take affirmative action to ensure that applicants are employed and the employees are treated equally during their employment without regard to race, religion, creed, color, sex, disability, or national origin and that such action shall include, but not be limited to the following: employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection available to employees and applicants for employment.

Applicants/participants, or other interested parties, who feel that they have received unequal treatment should contact the ~~Northwest Tennessee Workforce Board~~ LWDB Fiscal Agent/Staff to the Board, Workforce Innovations, Equal Opportunity Officer, 731-286-3585, TDD 7-1-1. Informal procedures and a hearing will be initiated to resolve the applicant/participant's complaint within 60 days. One-on-one assistance is available for individuals with disabilities when necessary. If these procedures do not resolve the issue to the applicant/partisan's satisfaction, the Equal Opportunity Officer will advise the applicant/participant of the formal complaint procedure as follows:

If an individual thinks he / she has been subjected to discrimination under WIOA Title I – financially assisted program or activity, the individual may file a complaint within 180 days from the date of the alleged violation with either:

~~Northwest TN Workforce Board~~

U.S. Department of Labor
Director, Civil Rights Center
U.S. Department of Labor
200 Constitution Avenue NW,
Room N-4123
Washington, D.C. 20210
202-693-6500
(TTY) 202-693-6516

TN Dept. of Labor & Workforce Development
Equal Opportunity Officer
220 French Landing Drive
Nashville, TN 37243
615-253-1331
(TDD) 615-532-2879

Workforce Innovations, Inc.
Equal Opportunity Officer
208 N. Mill Ave.
Dyersburg, TN 38024
731-286-3585
(TDD) 7-1-1

To file a complaint with the ~~NWTNWB~~ Workforce Innovations, Inc. Equal Opportunity Officer (EOO), all complaints must be submitted in writing to the EOO ~~at the Northwest Tennessee Workforce Board~~ in the form of a letter via certified U.S. Mail to: EOO, 208 N. Mill Ave., Dyersburg, TN 38024.

- 1) All complaints must include:
 - Name and address of complainant.
 - The identity of the individual or entity that the complainant alleges is responsible;
 - A description of the allegations in enough detail to allow an initial determination, establish jurisdiction, encourage timeliness, and determine the apparent merit of the complaint, including any supporting documentation;
 - A description of the allegations, including any supporting documentation;
 - Settlement or corrective action desired by complainant;
 - If there are any witnesses, their names and contact information are included; and
 - Date of the incident (or time frame, if there is an occurrence over a period of time), and date of filing;
 - Describe attempts to resolve the issue of complaint;
 - The complainant's signature or the signature of the complainant's authorized representative.
 - Complaints must be submitted within 180 days of the date of the incident.
- 2) The EOO will provide written acknowledgement of receipt of complaint to complainant.
- 3) The EOO will launch an investigation.
- 4) The EOO will hold a formal verbal discussion with complainant within fifteen (15) working days of receipt of complaint.
- 5) The EOO will communicate a written decision to the complainant within ten (10) working days of the verbal discussion.
- 6) For issues covered under this procedure, the decision may be appealed to the Tennessee Department of Labor and Workforce Development (TDLWD). If a decision has not been made within sixty (60) days, an appeal may also be made to the TDLWD.

The EOO must maintain documentation throughout the complaint process which must include, at a minimum, the Employment and Training Administration (ETA) Complaint/Apparent Violation Form, correspondence related to the complaint, and meeting minutes regarding any in-person adjudication between LWDA staff and the complainant, if applicable.

If a complaint is filed with the ~~Northwest Tennessee Workforce Board~~ LWDB Fiscal Agent/Staff to the Board, Workforce Innovations, Inc. EOO, the individual must wait either until the ~~Workforce Board~~ EEO issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center (see address above).

If the ~~NWTNWB~~ EEO does not give a written Notice of Final Actions within 90 days of the day on which the individual filed a complaint, the individual does not have to wait for the ~~Workforce Board~~ EEO to issue that Notice before filing a complaint with the CRC. However, the individual must file CRC complaint within 30 days of the 90-day deadline.

If the ~~NWTNWB~~ EEO does give written Notice of Final Action for the complaint, but the individual is dissatisfied with the decision or resolution, a complaint may be filed with CRC. An individual must file a CRC complaint within 30 days of the date on which he / she received the Notice of Final Action.

The ~~NWTNWB~~ Workforce Innovations, Inc. is an Equal Opportunity Employer/Program; Auxiliary Aides for services are available upon request to individuals with disabilities. An individual party to a collective bargaining agreement, alleging a labor standards violation, may also submit the grievance to a binding-arbitration procedure.

Complaint Logs

A complaint log will be maintained for each American Job Center and submitted to the TDLWD in accordance with their policy. The log must contain sufficient detail to identify who filed the complaint, who received the complaint, what the complaint alleges, where the complaint was filed, and when the complaint was filed.

Reporting Fraud, Waste, and Abuse

Information and complaints involving criminal fraud, abuse, or other criminal activity must be reported immediately in one of the following three ways:

Atlanta Regional Office, Office of
Investigations, U.S. Dept. of Labor
61 Forsyth Street Southwest,
Room 6T1
Atlanta, GA 30303

Tennessee Comptroller of
Treasury
Fraud, Waste, and Abuse
Hotline:
1-800-232-5454

Inspector General Office of
Investigations, Room S5514
U.S. Department of Labor
200 Constitution Ave.
Washington, DC 20210

Reference: 20 CFR 683.600(b)(1); 20 CFR 683.600(c); 29 CFR 38.1

Related TDLWD Policy: Grievance and Complaint Resolution Policy

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

Jimmy Williamson, Chair
Northwest Tennessee Workforce Board

Training Provider Approval

Effective Date: November 15, 2022

Duration: Indefinite

Purpose: In order to receive funds under Title I of WIOA, a training provider must make application to the local Workforce Board for approval. Therefore, customers approved for ITA funds can only select from programs on the Eligible Training Provider List (ETPL). If a program is not on the list, WIOA cannot pay the cost of attendance.

Policy: In the State of Tennessee, the Tennessee Department of Labor and Workforce Development (TDLWD) is charged by the State Workforce Development Board with the responsibility to develop and maintain the Eligible Training Provider List.

Training Provider Eligibility (TEGL 41-14)

To be eligible to receive funds, the training provider must meet at least one of the following requirements:

1. A postsecondary educational institution that is eligible to receive Federal funds under Title IV of the Higher Education Act of 1965 (20 U.S.C. 1070 et. Seq.) and provides a program that leads to an associate degree, baccalaureate degree, **diploma**, or certificate.
2. An entity that carries out programs under the National Apprenticeship Act of August 16, 1937; 50 Stat. 664, Chapter 663; 29 U.S.C. 50 et. seq.
3. Another public or private provider of a program of training services for the general public or specialized training for participant populations that face multiple barriers to employment such as providers directly associated with the Division of Rehabilitation Services, TN Department of Human Services. These populations include the following categories: low-income individuals with barriers to employment and people with disabilities.
4. LWDBs if they meet the conditions of WIOA Section 107(g)(1).
5. Another public or private provider with demonstrated effectiveness providing training to a population that faces multiple barriers to employment. These populations include:
 - a. Displaced homemakers
 - b. Low-income individuals
 - c. Indians, Alaskan natives, and native Hawaiians, as such terms are defined in WIOA Section 166(b)
 - d. Individuals with disabilities, including youth who are individuals with disabilities
 - e. Older individuals
 - f. Ex-offenders
 - g. Homeless individuals (as defined in Section 41403(6) of the Violence Against Women Act of 1994 [42 U.S.C. 1404e-2(6) as amended in 2013]; 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. 1143a[2] and Section 721). Youth who are in or who have aged out of the foster care system
 - h. Individuals who are English language learners, including individuals who have low levels of literacy and individuals facing substantial cultural barriers
 - i. Eligible migrant farmworkers, as defined in WIOA Section 167(i), and services to other low-income individuals
 - j. Individuals within two (2) years of exhausting lifetime eligibility under Part A of Title IV of the Social Security Act (42 U.S.C. 601 et. Seq.)
 - k. Single parents (including single pregnant women)
 - l. Long-term unemployed individuals
 - m. Other groups the Governor determines to have barriers to employment (WIOA Section 134[c][3][E])
6. Other groups as determined by the Governor.

In-state and out-of-state post-secondary institutions must be authorized by a state governing body—such as the Tennessee Higher Education Commission (THEC), the Tennessee Board of Regents (TBRs), the Tennessee

Independent Colleges and Universities Association (TICUA), and the Southern Association of Colleges and Schools (SACs)—to operate in the State of Tennessee. This does not apply to RAs.

Program of Training

Training services program may be delivered in person, online, hybrid, or blended format and must lead to at least one (1) of the following:

1. An industry-recognized certificate or certification, a certificate of completion of a Registered Apprenticeship, a license recognized by the State involved or the Federal government, an associate or baccalaureate degree;
2. A secondary school diploma or its equivalent;
3. Employment; or
4. Measurable skill gains toward a credential or secondary school diploma.

ETPL Exceptions

The following activities are exempt from utilizing the ETPL process:

1. On-the-Job Training and Customized Training (as defined by WIOA)
2. Skill enhancement and workplace literacy are considered to be short-term prevocational and, therefore, are not defined as training services for the purposes of this policy.
3. Short-term prevocational services are not tied to a specific occupation and include course-like services such as Literacy and Adult Basic Education, Workplace Literacy, introductory computer classes, as well as development of learning skills, communication skills, interviewing skills, punctuality training, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment or training.
4. Community-based organizations and other private organizations providing training.

Registered Apprenticeship Programs (TEGL 41-14)

All approved Registered Apprenticeships (RA) are automatically eligible to be included on the statewide ETPL. RAs are not subject to the same application, performance information requirements, or period of initial eligibility procedures since they have already gone through a detailed application and vetting process through the USDOL Office of Apprenticeship. The information required for an RA program to be added to the ETPL is:

- Occupation(s) included within the registered apprenticeship program;
- Name and address of the Registered Apprenticeship Program Sponsor;
- Name and address of the related technical instruction provider, including the location of the facility if different from the program sponsor's address;
- Method and length of instruction, and
- The number of active apprentices.

Reciprocal Agreement

While the ETPL is the primary list of ETPs and programs to be used when referring an eligible WIOA Title I-B candidate to training, the LWDB can send a participant to training located in a different state if the training provider has a Reciprocal Agreement with Tennessee. These agreements allow Tennessee participants to use ETPs if that training provider appears on the other State's ETPL. Similarly, WIOA participants in the reciprocal states can utilize programs that are on Tennessee's ETPL.

ETP Approval Process

The ~~Northwest~~ Local Workforce Development ~~Area~~ Board (LWDB) agrees to adopt the procedures and formats provided by TDLWD for accepting and processing applications for the Eligible Provider List. Said procedures include processes and formats for Renewal Applications for “grandfathered” eligible providers and for others which have completed their period of initial eligibility, as well as processes for making initial application. Interested applicants shall visit the Eligible Training Provider (ETP) website at www.Jobs4TN.gov in order to

register and complete the appropriate application forms as provided by TDLWD within the system. Application forms are available online at the website listed above.

Upon receipt of completed applications, a Sub-Committee of the ~~Northwest Tennessee Workforce Board (NWTNWB)~~ LWDB will review and make recommendation to the ~~Northwest Tennessee Workforce Board~~ LWDB for approval, denial or other additional/subsequent consideration. The Sub-Committee Committee, other committees of the ~~NWTNWB-LWDB~~, or ~~NWTNWB-LWDB~~ members may request any additional information from the applicant institution deemed necessary. Applicants must provide all requested performance, cost, credentialing, articulation documentation, or other information requested by the Committee and/or the ~~NWTNWB~~ LWDB. The LWDB will review and approve applicants which are deemed to have met the criteria outlined in WIOA Subtitle B, Chapter 1, Section 122.

Third-Party Training Services

ETPL approved training providers who wish to partner with third-party training services must ensure the training service provider has a physical presence in the United States. The third-party provider must be authorized for postsecondary training by the appropriate state authorization agency and comply with all WIOA and ETPL procedures. Each program must be evaluated individually to determine if successful completion of the program results in a recognized credential. The ETPL training provider is responsible for collecting initial and continued applications for performance data requirements of the ETPL annual reporting. Further, the certificate received by participants upon successful completion must be issued by the ETPL training provider. It must include the name of the training provider listed on the ETPL, not the name of the third party training provider.

Making Changes to ETP and Program Information

Training providers must submit additional documents and information as needed to the LWDB and the TDLWD as required, such as periodic updates on WIOA training participants, including copies of credentials and transcripts received by WIOA Title I participants, information about all students attending a training program as required for reporting of performance measures, submitting the Annual Training Performance Report (Annual Report) to the TDLWD and LWDB (excluding Registered Apprenticeships), notifying the LWDB of any changes or updates to a training program, changes in the point of contact, a transition of the school's location, or impending sale or closure.

Revision(s) to already approved and existing program curriculums must first be approved by the appropriate State authorizing agency (Tennessee Higher Education Commission, Tennessee Board of Regents, etc.) if required. The ETP must submit the proper forms using the online web application to make changes on the ETPL. Changes submitted by the ETP are subject to review by the LWDB and the State. Changes in program cost or length that are beyond twenty-five percent (25%) must be resubmitted to the LWDB for approval as a new program. It is the responsibility of the ETP to ensure that information displayed on the ETPL is accurate. ETPs with inaccurate information on the ETPL as discovered in conjunction with a Data Validation review or a Data Accuracy Report are subject to removal from the ETPL for a set suspension period or until all information is corrected (whichever occurs later).

Subsequent Eligibility Determination

Approved training providers receive initial eligibility for one fiscal year for a particular program. After the initial eligibility expires, training providers are subject to application procedures for continued program eligibility every two years. ~~Finally,~~ Renewal applications must be reviewed by the LWDB and provide required performance data, meeting or exceeding performance standards as outlined in TDLWD policy, in order to remain on the Eligible Training Provider List. If approved, the ~~NWTNWB~~ LWDB will submit appropriate information and recommendation for addition to the Statewide Eligible Training Provider List in the Jobs4TN system.

All approved training providers on the ETPL will be required to provide performance data on all training participants as required WIOA section 116(d)(4). The reporting information should contain the nine elements on "All Individuals" in the ETA-9171 report. These elements are as follow:

- Total number of individuals served;
- Total number of individuals exited (includes students who completed, withdrew or transferred out of the program);
- Total number who completed the program;
- Total number of exiters employed in the 2nd quarter after exit;
- Total number of exiters employed in the 4th quarter after exit;
- Median earnings of exiters in the 2nd quarter after exit;
- Total number of exiters who attained a credential during participation or within one year after exit;
- Average earnings in the 2nd quarter after exit; and
- Average earnings in the 4th quarter after exit.

Besides the requirements above, the State has established four (4) performance standard measures to evaluate the Subsequent Eligibility determination for programs with a minimum of ten (10) WIOA students at the end of each program year (July 1- June 30), and they are as follow:

- WIOA student completion rate for each Program must be greater than or equal to 40%.
- All student completion rates for each Program must be greater than or equal to 70%.
- WIOA student placement rate for each Program must be greater than or equal to 40%.
- All student placement rates for each Program must be greater than or equal to 70%.

Failure to Meet Subsequent Eligibility

To maintain eligibility as a training provider, an entity must provide accurate information and adhere to federal and State performance metrics as provided in additional State guidance. Failure to meet performance requirements can result in punitive action to include written warnings, suspension, or removal of a provider or program from the ETPL. Supplemental data, explained within WIOA Section 122(b)(1)-(b)(4)(D) and 20 CFR 680.490, such as the specific economic, geographic, and demographic factors in the local areas in which training providers seeking eligibility are located; and the characteristics of those served by the eligible training providers seeking eligibility, including the demonstrated difficulties in serving such populations, where applicable, may be considered prior to removal. The LWDB will inform the ETP in writing and include the reason(s) for the removal. Any program removed from the ETPL for subsequent eligibility reasons must remain off of the ETPL for a minimum of one (1) complete program year. In order for the program to be added back to the ETPL, the ETP must re-apply through the LWDB. Performance data is required as part of the application process for the time period when the program was removed from the ETPL. While a program is removed from the ETPL for subsequent eligibility reasons, the ETP cannot receive new WIOA Title I training participants or utilize WIOA ITA funds for the removed programs. Additionally, an ETP may be suspended from the ETPL for actions provided in State policy. An ETP whose eligibility is terminated as a result of the reasons specified in Subsequent Eligibility of the current policy for a program shall be liable for repayment of all funds received during any period of noncompliance (WIOA Section 122[f][1][C]).

Request by ETP to be Removed from ETPL

Any time after the initial program approval by the LWDB, the ETP (including Registered Apprenticeship Programs) can request to have a program removed from the ETPL. If a program is removed from the ETPL, with the exception of Registered Apprenticeship programs, the ETP is still required to submit quarterly performance reports until the last WIOA training participant completes or withdraws from the program. Failure to submit the remaining quarterly performance reports will subject the ETP to the penalties according to State policy. If at any point after initial approved training is temporarily not offered or is permanently deleted from the ETP's selection of the programs, it must be removed from the ETPL within thirty (30) days of the institutional decision.

Training Providers Appeal Process

If a Local Workforce Development Board (LWDB) rejects an application for initial eligibility determination for a

program of training service, the LWDB must provide notice with the letter of rejection containing the reasons for rejections as well as the availability of an appeals process.

Reasons for Denial of Application for Initial Eligibility:

1. LWDB or the State may deny eligibility if the application from an ETP is not complete or not submitted within the required time frame.
2. LWDB or the State may deny eligibility if an applicant fails to meet the minimum criteria for initial listing specified in this policy (WIOA Section 122[c][1]).
3. LWDB may deny eligibility if the training programs offered by the ETP do not lead to gainful employment in in-demand occupations as determined by a labor market analysis.
4. LWDB may deny eligibility if the training program demographics (i.e. cost and length) are substantially higher (beyond fifty percent [50%] than previously approved programs offering the same credential (within the past two [2] program years).
5. LWDB or the State may deny eligibility if it is determined that the applicant intentionally supplied inaccurate information (WIOA Section 122[f][1][B]).
6. LWDB or the State may deny eligibility to a training provider who has been found to have substantially violated any WIOA requirements (WIOA Section 122[f][1][B]).

Local Appeals - Each LWDB maintains a written appeal process. The procedure includes an opportunity for a hearing, with a final written decision on the appeal to be provided within sixty (60) days of the date of the LWDB's receipt of the request for appeal. If the provider is not satisfied with the outcome of the local appeal, a provider may submit a formal appeal to the State appeals committee.

Should an application for addition to the ETPL be denied by the ~~NWTDNB~~-LWDB, the ~~NWTDNB~~-LWDB will notify the applicant of the denial, the reason(s) for the denial, and information on the appeal process within ten (10) working days. Notification shall be written and may be transmitted by U. S. Postal Service, Return Receipt Requested, Fed Ex or other package delivery service, by facsimile transmission, and/or electronically through e-mail. The applicant institution may access the approved ~~NWTDNB~~ LWDB appeal process, as follows:

1. The institution must request, in writing, additional consideration by the ~~NWTDNB~~ LWDB and its Sub-Committee of at least 1 – 3 impartial appeal officers (i.e. any staff or board members uninvolved in the initial decision). The written request must be submitted within 10 working days of receipt of written notification of denial or need for additional information/review by the ~~NWTDNB~~-LWDB.
2. Address local appeals to the Workforce Innovations, Inc., Attn: Executive Director and Board Chairman at 208 N. Mill Ave. in Dyersburg, TN 38024, (731) 286-3585, TDD # 711.
3. The LWDB Sub-Committee shall consider the appeal request within 30 calendar days of receipt of the written request for appeal and shall make a recommendation to the LWDB for approval, denial, or request for additional/subsequent information.
4. The LWDB must consider the appeal and the recommendation of the Sub-Committee and render a decision at its next regularly scheduled LWDB meeting, or within 60 calendar days from the date the LWDB received the written request for appeal from the provider institution, whichever is greater.
5. The applicant institution must be notified, in writing, of the decision of the LWDB within 10 working days of the LWDB final action, and the process for filing a State appeal in the event the provider is not satisfied with the outcome of the local appeal. As referenced above, written notification may be in the form of USPS Return Receipt Requested, Fed Ex or other package delivery service, facsimile transmission, and / or electronically using e-mail.
6. If the applicant disagrees with the action taken by the LWDB through its local appeal process, the applicant may access the appeal process through the THEC, according to established THEC appeal procedures, as outlined in the approved Strategic Five Year State Workforce Investment Plan for the State of Tennessee.

7. In the event an approved provider is removed or suspended from the ETPL, students enrolled through the Workforce Innovation and Opportunity Act (WIOA) prior to the suspension/removal will be allowed to continue their training using WIOA funds until completion. No new students may be enrolled into a suspended/removed institution until official notification of reinstatement has been received.

State Level Appeals

This procedure applies only to training providers who have exhausted the appeal process of a Local Workforce Development Board and are dissatisfied with the Local Workforce Development Board's final decision.

8. A training provider wanting to appeal to the State must submit an appeal request to the State within 30 days from the LWDB's notification to the training provider of its final decision on an appeal. The request for an appeal to the State must be in writing and include a statement of the desire to appeal, specification of the program(s) in question, the reason(s) for the appeal (i.e. grounds), and the signature of the appropriate provider official.
9. The State will promptly notify the LWDB when it receives a request for appeal. The State will also notify the LWDB when it makes the final decision on an appeal.
10. The State appeal process includes the opportunity for the appealing training provider to have a hearing. The hearing officer must be impartial. The hearing officer must provide written notice to the concerned parties of the date, time, and place of the hearing at least 10 calendar days before the scheduled hearing. Both parties must have the opportunity: to present oral and written testimony under oath; to call and question witnesses; to present oral and written arguments; to request documents relevant to the issues(s), and to be represented.
11. The five-member State appeals committee, chaired by the hearing officer, will administratively review the appeal, make a preliminary decision, and notify the training provider and the LWDB. The committee may either uphold or reverse the LWDB decision.
12. The State appeals committee must render a decision within 60 days from receiving the training provider's initial State appeal request.

Dissemination of the ETPL for Customer Access

The State will ensure that the ETPL is accurate and current. The State must ensure that the updated list is available to all LWDBs (WIOA Section 122[d][1]) and to the general public through the State website wherever internet service is available. The LWDB is responsible for ensuring that all American Job Center (AJC) staff members have access to the ETPL and are knowledgeable about utilizing the ETPL; the LWDB will also ensure local access to the ETPL is made available for customers within the AJCs (WIOA Section 122[d][1]). The LWDB is also responsible for ensuring that all American Job Center staff do not allow WIOA participants to enroll in programs that do not appear on the ETPL.

Participant Selection of ETP

Participants utilizing an Individual Training Account (ITA) will have the opportunity to select any of the approved ETPs and programs on the ETPL (WIOA Section 122[d]). While participants can select from the complete ETPL, State and LWDB policies determine the funding amounts for each program. Thus, the LWDB may choose not to fund certain categories of training programs based on, but not limited to, the following reasons: lack of occupational demand for LWDB; high tuition cost in comparison to comparable programs; and lack of a livable wage upon program completion

Monitoring

The TDLWD will monitor the LWDBs for ETPL compliance at a minimum of every two (2) years. The LWDBs must monitor a minimum of fifteen percent (15%) of a training providers' program each year between July 1 and June 30. The LWDB staff will randomly select WIOA participant files and validate that the data has been uploaded into the system correctly, ensuring that the yearly Federal ETP report is accurate. Additionally, the LWDBs must

establish monitoring procedures and will provide a copy of this process to the ETPL Coordinator upon request. The ~~NW TNWB's~~ LWDB's monitoring procedures shall include:

1. Running reports in Jobs4TN quarterly to identify programs due for renewal.
2. Selecting a sample of the ETP's programs due for renewal that representative of at least 15% of the ETP's programs on the ETPL.
 - a. If the programs due for renewal do not constitute a large enough sample, additional programs will be selected at a later time in the program year when they are due for renewal, or
 - b. If additional programs are not due for renewal within the program year, additional programs will be selected at the time of the review.
3. Completing a review of the selected programs by:
 - a. Verifying the information in Jobs4TN is complete and accurate.
 - b. Ensuring a copy of the accrediting body's receipt letter or exemption certificate is on file.
 - c. Ensuring the program is still in-demand.
 - d. Evaluating the process in place for tracking student and WIOA participant progress, completion, placement, and earnings for required performance measures.
 - e. Verifying that the annual ETPL performance report for the program has been submitted timely and with accurate information.
 - f. Ensuring all applicable performance standards were met in accordance with TDLWD policy.
 - g. Verifying the number of WIOA participants served.
 - h. Selecting a 10% sample of WIOA participants, including at least one student per program being monitored, for review.
 - i. Validating that the data has been uploaded into the system correctly, ensuring that the yearly Federal ETP report is accurate.
4. Monitoring results will be documented and kept on file by the LWDB staff.

Data Validation

To ensure the accuracy and validity of the information supplied by Eligible Training Providers, the State conducts data validation visits at least once every year for all ETPs or as warranted by WIOA enrollment numbers. The State will notify the LWDB of the audit findings within ten (10) days of auditing of an ETP within LWDB area.

References:

Workforce Services Policy - Eligible Training Provider List, TN-WIOA (16-9); Title I of the Workforce Innovation and Opportunity Act of 2014 (29 U.S.C. 3101 et seq.); Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.); WIOA Section 188 Nondiscrimination; WIOA Section 122

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

Jimmy Williamson, Chair
Northwest Tennessee Workforce Board

Priority of Service

Effective Date: November 15, 2022

Duration: Indefinite

Purpose: To provide guidance to the One-Stop Operator and American Job Center Service Providers on the requirements for providing priority of service to all covered persons and identified populations. This guidance will differentiate the requirements based on a participant's "point of entry" and their enrollment into a program to receive employment and/or training services.

Policy: Priority of service means the right to take precedence over a person with lower priority in obtaining employment and training services. 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 "point of entry" priority of service for all DOL-funded job training programs, which include WIOA programs.

"Point of Entry" Priority of Service

Any covered person who is seeking WIOA services must be provided priority of service at their "point of entry" into the workforce system. Covered persons include:

1. **Veterans:** persons who have served at least one (1) day of active duty in the military, naval, or air service, and were discharged or released from such service with other than a dishonorable discharge.
2. **Eligible Spouses:**
 - A spouse of any veteran who died of a service-connected disability; or
 - A spouse of any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than ninety (90) days:
 - o Missing in action
 - o Captured in the line of duty by a hostile force, or
 - o Forcibly detained or interned in the line of duty by a foreign government or power; or
 - A spouse of a veteran who has a total disability resulting from a service-connected disability, as evaluated by the department of Veteran Affairs; or
 - A spouse of any veteran who died while a disability was in existence. A spouse will lose eligibility if it is derived from a living veteran, or a service member, who loses their status which made them eligible. For instance, if a veteran, with a total service-connected disability, were to receive a revised-disability rating at a lower level. Similarly, a spouse, whose eligibility is derived from a living veteran or service member, would lose that eligibility upon a divorce from that veteran or service member. The spouse of a veteran who died as the result of a service-connected disability, or died while a disability was in existence, would not lose covered status through subsequent remarriage.

The "point of entry" includes physical locations, such as AJCs, as well as websites, and other virtual service delivery resources. The One-Stop Operator will be responsible for assuring that the AJC staff are aware of, promote, and comply with the Priority of Service policy. A Priority of Service notice will be posted at each AJC detailing:

- How priority of service allows a covered person to take precedence over a non-covered person,
- That individuals may self-attest to being a member of a priority population, and
- The services available to priority populations.

AJC staff will also evaluate priority status during the initial assessment, eligibility process, and / or enrollment. Each AJC customer is greeted and provided with an evaluation of service need by the AJC staff person serving in the Welcome Function which includes questions for identifying both Veteran and high school diploma /

equivalent status. Additionally, the Priority Policy will be posted on the area's website, which will also include a designated section for an electronic version of the priority notice displayed in the AJCs to be posted.

Employment and Training Priority of Service

The priority of service for veterans and eligible spouses always applies across all qualified employment and training programs. The priority of service for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient is a statutory priority that applies only to the recipient of individualized career and training services in the WIOA Title I Adult program.

As described in TEGL 10-09, when programs are statutorily required to provide priority for a particular group of individuals, such as the Point of Entry priority described above, priority must be provided in the below manner:

1. **Priority Group # 1** - Veterans and eligible spouses who are also recipients of public assistance, low income, or basic skill deficient.
2. **Priority Group # 2** - Non-Veterans who are recipients of public assistance, low income, or basic skill deficient.
3. **Priority Group # 3** - Veterans and eligible spouses who are **not** also recipients of public assistance, low income, or basic skill deficient and meet Title I Adult eligibility.
4. **Priority Group # 4** - Other individuals (not veterans or eligible spouses) who do not meet the statutory priority (such as public assistance recipients, other low-income individuals including underemployed, or those who are basic skills deficient), but do meet discretionary criteria established by the Local Workforce Development Board (LWDB), and Title I Adult program eligibility.

In accordance with WIOA Section 2, the purpose of the WIOA is to increase, particularly for individuals with barriers to employment, access to and opportunities for the employment education, training, and supportive services they need to success in the labor market. Furthermore, per TN Department of Labor and Workforce Development (TDLWD) Workforce Services Guidance – WIOA Memorandum of Understanding (MOU) / One-Stop Service Delivery and Infrastructure Funding Agreement (IFA), the following demographics experiencing barriers to employment are specifically targeted for services and must be provided priority for training activities as Priority Group # 4:

- | | |
|---|--|
| <ul style="list-style-type: none"> • Individuals with significant barriers to employment • Displaced homemakers • Eligible migrant and seasonal farmworkers • Re-entry services Justice-Involved Individuals • Homeless individuals • Individuals facing substantial cultural barriers • Individuals with disabilities, including youth with disabilities • Individuals within two years of exhausting lifetime eligibility under Part A of the Social Security Act 13 | <ul style="list-style-type: none"> • Individuals who are English language learners • Individuals who are unemployed, including the long-term unemployed • Individuals who have low levels of literacy • Individuals without a high school diploma • Native Americans, Alaskan Natives, and Native Hawaiians • Older individuals • Single parents (including single pregnant women and non-custodial parents) • Veterans • Youth who are in, or have aged out of, the foster care system |
|---|--|

Additionally, the ~~NW~~ LWDB area includes individuals who are employed with an income below the ~~NW~~ LWDB Self-Sufficiency Standard, as identified in the Adult and Dislocated Worker Eligibility policy, that are identified to need training as part of Priority Group # 4. Per the [U.S. Bureau of Labor Statistics](#), achieving higher levels of education reduces the incidence of living in poverty, and people who complete more years of education usually have greater access to higher paying jobs than those with fewer years of education. By contrast, individuals employed in occupations that typically do not require high levels of education and that are characterized by relatively low earnings were more likely to be among the working poor.

LOCAL WORKFORCE DEVELOPMENT BOARD PARTICIPANT PROGRAM POLICY

To be served under priority group #4, individuals must supply the following documentation as appropriate:

Barrier	Required Documentation
Displaced Homemakers.	Documentation of living in the same household as a spouse or parent / guardian who had income supporting the applicant and providing unpaid services; Documentation of loss of income; and Documentation of being unemployed or underemployed and experiencing difficulty in obtaining or upgrading employment.
Non Self-Sufficient Individuals	Documentation requirements as listed in within the Adult and Dislocated Worker Eligibility Policy.
Indians, Alaska Natives, and Native Hawaiians, as such terms are defined in section 166.	Self-Attestation on Application.
Individuals with disabilities, including youth who are individuals with disabilities.	Documentation of the disability such as a written statement from Vocational Rehabilitation reflecting current services, verification showing current receipt of SSI or SSD for the individual from the Social Security Administration, or a letter from a local education entity stating the individual is M-Teamed based on a disability.
Older individuals (an individual age 55 or older).	Usual documentation requirements for Date of Birth (i.e. Driver's License, Birth Certificate, etc.)
Ex-Offenders Justice-Involved Individuals.	Self-Attestation on Application.
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 defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))).	Self-Attestation on Application.
Youth who are in or have aged out of the foster care system.	Documentation of foster care status from the appropriate foster care agency.
Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers.	Scoring below a 9.0 on the TABE or CASAS.
Eligible migrant and seasonal farmworkers, as defined in section 167(i).	Documentation of eligibility from TOPS.
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.).	Agency (i.e. DHS or WFE) documentation.
Single parents (including single pregnant women).	Documentation of parenting (i.e. birth certificate) and indication of single status on the Application, including only one parent being listed in the household.
Long-term unemployed individuals (Individuals who are unemployed for 27 or more weeks per WIOA Application found in the Virtual One Stop system as provided by TNDOL).	Self-Attestation on the Application <u>AND</u> documentation of means of support.
Individuals facing substantial cultural barriers	Self-Attestation on Application and / or documented in case notes.

LOCAL WORKFORCE DEVELOPMENT BOARD PARTICIPANT PROGRAM POLICY

Individuals who have low levels of literacy	Objective, valid, and reliable assessment such as the Comprehensive Adult Student Assessment Systems (CASAS) or Tests of Adult Basic Education (TABE).
Individuals without a high school diploma	Self-Attestation on Application and / or documented in case notes.

5. **Priority Group # 5** - Non-covered persons outside the groups given priority under WIOA or TDLWD policy but who meet Title I Adult eligibility.

Percentage of Priority Populations Served

Per TEGL 7-20, ETA envisions that giving priority of service to these individuals means ensuring that at least 75% of a state's participants receiving individualized career and training services in the Adult program are from at least one of the priority groups mentioned above, and expects this rate will be no lower than 50.1% in any state. Though not relevant for the 50.1% minimum which should be met by all states, when reviewing state progress against the 75% percent benchmark, ETA will consider state progress against additional priority populations established by the Governor and/or Local WDB. The Tennessee Department of Labor and Workforce Development (TDLWD) has set a goal ~~It is expected~~ that 75% of individuals enrolled in the Title I Adult program must be a recipient of public assistance, low-income, or basic skills deficient as identified in the above section as priority of service level one (1) and two (2). A priority group that is identified by the Governor of Tennessee or a LWDB will not count towards the 75%. Any LWDB who does not meet this metric will be placed under sanctions per the State Workforce Development Boards (SWDB) policy. Documentation of the participant's eligibility as a priority participant, such as public assistance records, income information, or academic assessments, must be maintained in the participant's file. **The LWDB will strive for this goal; however, at the direction of the TDLWD, will not deny services to other eligible priority groups.**

Procedures for Applying Priority of Service

AJC staff will evaluate priority status during the initial assessment, eligibility process, and / or enrollment. Each AJC customer is greeted and provided with an evaluation of service need by the AJC staff person serving in the Welcome Function which includes questions for identifying potential priority status. Title I staff will also request information during orientation and / or eligibility and enrollment to determine priority status. Documentation of priority status will be maintained in participant's electronic case file. The Priority Policy will be posted on the area's website, which will also include a designated section for an electronic version of the priority notice displayed in the AJCs to be posted.

In order to appropriately serve priority populations as described above, AJC Staff will provide appointments accordingly within the timeframes described below:

- Priority Group # 1 - the first available appointment, but no longer than three (3) working days.
- Priority Group # 2 - the first available appointment, but no longer than four (4) working days.
- Priority Group # 3 - the first available appointment, but no longer than five (5) working days.
- Priority Group # 4 - the first available appointment, but no longer than six (6) working days.
- Non-covered persons outside the groups given priority under WIOA or TDLWD policy will be scheduled at the first available appointment, subject to currently scheduled PRIORITY appointments.

Basic Career Services will continue to be available to all Adults.

Process for Determining Low Income Eligibility

Unless otherwise indicated (i.e. specific groups 1 and 2), applicants must meet the criteria in the WIOA definition of a low-income individual, including public assistance recipients, as listed in below order to be determined eligible as Priority Adults:

LOW-INCOME INDIVIDUAL is an individual who—

- (i) receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the supplemental nutrition assistance program established under the

Food and Nutrition Act of 2008 (7U.S.C. 2011 et seq.), the program of block grants to States for temporary assistance for needy families program under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), or the supplemental security income program established under title XVI of the Social Security Act (42 U.S.C. 1381 et seq.), or State or local income-based public assistance;

(ii) is in a family with total family income that does not exceed the higher of—

(I) the poverty line; or

(II) 70 percent of the lower living standard income level;

(iii) is a homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 H. R. 803—12 (42 U.S.C. 14043e–2(6))), or a homeless child or youth (as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)));

(iv) receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.);

(v) is a foster child on behalf of whom State or local government payments are made; or

(vi) is an individual with a disability whose own income meets the income requirement of clause (ii), but who is a member of a family whose income does not meet this requirement.

A youth eighteen (18) or older, who was determined to be a low-income individual eligible for the WIOA Title I Youth program, may be co-enrolled in the WIOA Title I Adult program without an additional determination of eligibility. They may be counted as an individual who meets adult priority of service if the original determination was made no more than six (6) months prior to the date of co-enrollment.

Process for Determining Basic Skills Deficient Status

According to the WIOA, “basic skills deficient means, with respect to an individual, (A) who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or (B) who is a youth or adult, that the individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society.

In accordance with Workforce Services Policy –Priority of Services for Adults, Veterans, and Eligible Spouses, the area will utilize the basic skills definition contained in WIOA Section 3(5)(B) (above), documented by using an objective, valid, and reliable assessment, such as the Comprehensive Adult Student Assessment Systems (CASAS) or Test for Adult Basic Education (TABE). An individual who has an English, reading, writing or computing skills at an 8.9 or below on a standardized test (CASAS or TABE) will be considered basic skills deficient. If an applicant is qualified as priority based on the basic skills deficient criteria, then the participant's file must contain academic tests (including the participant's name, date of test, and results).

Reference: WIOA Section 134(c)(3)(E); 20 CFR 680.640; TEGL 19-16; WIOA Section 134(d)(4)(E); WIOA Section 3(24); WIOA Section 3(5)(B); WIOA Section 3(36); WIOA Section 134(c)(3)(E); **TEGL 7-20**

Related TDLWD Policy: Workforce Services Policy – Priority of Service for Adults, Veterans, and Eligible Spouses.

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

Jimmy Williamson, Chair
Northwest Tennessee Workforce Board

Veterans and Eligible Spouse Priority of Services

Effective Date: November 15, 2022

Duration: Indefinite

Purpose: To establish policy and guidelines to ensure that veterans and eligible spouses are identified at the “point of entry” and informed of their entitlement to priority of AJC services.

Policy: American Job Centers, under the direction of the One-Stop Operator, must ensure that veterans and eligible spouses are identified at the “point of entry” (reception area, resource area, web-sites, Self-Services and Informational bulletin boards, etc.), and informed of their entitlement to priority of services.

Procedure to ensuring the priority of service

- Displaying signs that clearly describe the priority of services and the registration process. This information must also be conveyed when veteran and eligible spouse access services electronically or by telephone.
- If a person self identifies as a veteran, or other eligible person, immediate priority of service is required.
- Identifying veterans and other covered persons using Military Service Form LB-1118 (April 2016) when they visit service delivery points.
 - It is neither necessary nor appropriate to require verification of the status of a veteran or other eligibility at the point of entry. **Verification as a veteran must be done ONLY when determining eligibility for enrollment (e.g. in WIOA Program). Military Service Form LB-1118 will be used as an initial screening tool to establish eligibility.**
- Coordinating employer outreach development activities with related responsibilities of the Local Veterans Employment Representative (LVER) staff.
- Identifying employers who are interested in hiring veterans.
- Promoting job fairs for veterans and eligible spouses.
- Monitoring the priority of services will be done at the point of entry and during training and employment services.

The LWDA ~~12~~ Priority of Services Policy identifies veterans and eligible spouses as category #1 and #3 for priority of services in accordance with the following definitions (TDLWD 17-5):

- A Veteran is a person who has served at least one day of active duty in the military, naval or air service, and who was discharged or released under conditions other than a dishonorable discharge.
- An Eligible Spouse (must meet one qualification):
 - A spouse of any veteran who died of a service-connected disability
 - A spouse of any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - Missing in action
 - Captured in the line of duty by a hostile force, or
 - Forcibly detained or interned in the line of duty by a foreign government or power
 - A spouse of a veteran who has a total disability resulting from a service-connected disability, as evaluated by the department of Veterans Affairs
 - A spouse of any veteran who died while a disability was in existence.

NOTE: A spouse will lose eligibility if it is derived from a living veteran, or a service member, who loses their status which made them eligible. Such a situation would be: if a veteran, with a total service-connected disability, were to receive a revised-disability rating at a lower level. Similarly, a spouse whose eligibility is derived from a living veteran or service member, would lose that eligibility upon a divorce from that veteran or service member. To further clarify, the spouse of a veteran who died of a service-connected disability, or died while a disability was in existence, would not lose covered status through subsequent remarriage.

Attachment: Military Service Form

Reference: 20 CRF 680.650

Related TDLWD Policy: Veterans and Eligible Spouse Priority of Service Policy 17-5 (pages 3 and 4)

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

Jimmy Williamson, Chairman
~~Northwest Tennessee Workforce Board~~



MILITARY SERVICES FORM

Priority of service is the right of every qualifying individual who served in the military or eligible military spouses to receive employment, training, and placement services before non-eligible persons, as long as other provisions of the law are met. Please complete this questionnaire so we can determine your eligibility for services.

SERVED IN THE MILITARY (Section A)	
Date: _____	
Full Name: _____ SSN: _____	
Branch of Service: _____ Discharge Type: _____ Dates of Service: _____ Rank/Rate: _____	
Contact Information: (_____) Home <input type="checkbox"/> Cell Phone <input type="checkbox"/> E-Mail: _____	
How can we help you today? _____	
Have you ever served on active duty in any branch of the Armed Forces, or are you a Transitioning Service Member, Wounded Warrior, Spouse or Family Caregiver of a service member or veteran? If so you may be entitled to additional services if you can attest to at least one of the criteria below;	
<div style="display: flex; justify-content: space-between;"> <div> <p>1. Are you a special disabled or disabled veteran whereas you are; Entitled to compensation (or who but for the receipt of military retired pay would be entitled to Compensation)? or _____</p> <p>Have a claim pending with the VA; or _____</p> <p>Were discharged or released from active duty because of a service-connected disability? _____</p> <p>2. Are you homeless or without a permanent residence? _____</p> <p>3. A recently-separated service member, (Within 3 years of End of Active Service) who at any point in the previous 12 months has been unemployed for 27 or more weeks? _____</p> <p>4. An offender, who is currently incarcerated or has been released from custody? _____</p> <p>5. Are you in need of a high school diploma or equivalent certificate? _____</p> <p>6. Low-income (as defined by the State. (See attached chart)? _____</p> <p>7. Are you between the ages of 18 and 24? _____</p> </div> <div style="display: flex; flex-direction: column; justify-content: space-between;"> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> </div> </div>	
OTHER ELIGIBLE (Section B)	
<div style="display: flex; justify-content: space-between;"> <div> <p>1. Are you a Transitioning Service Member with any of the criteria as defined in section A? _____</p> <p>2. Do you have a letter from the VA stating you are an eligible spouse? _____</p> <p>3. Does your spouse have a total disability from a service-connected disability? _____</p> <p>4. Has your spouse been listed as forcibly detained or interned by a foreign government or power, missing in action, or captured in line of duty for a total or more than 90 days? _____</p> <p>5. Are you the surviving spouse of a veteran who died of a service-connected disability as evaluated by the VA or while having a total permanent service-connected disability? _____</p> <p>6. Are you a "Wounded Warrior" currently in a treatment facility or a Caregiver of one? _____</p> </div> <div style="display: flex; flex-direction: column; justify-content: space-between;"> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> </div> </div>	
MILITARY DOCUMENTS	
<div style="display: flex; justify-content: space-between;"> <div> <p>1. Do you need to obtain a DD214? _____</p> <p>2. Did you receive a DD2958 Service Member Career Readiness Standard/Individual Transition Plan? _____</p> </div> <div style="display: flex; flex-direction: column; justify-content: space-between;"> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> <div><input type="checkbox"/> Yes <input type="checkbox"/> No</div> </div> </div>	



MILITARY SERVICES FORM

Priority of service is the right of every qualifying individual who served in the military or eligible military spouses to receive employment, training, and placement services before non-eligible persons, as long as other provisions of the law are met. Please complete this questionnaire so we can determine your eligibility for services.

SERVED IN THE MILITARY (Section A)	
Date: _____	
Full Name: _____ SSN: _____	
Branch of Service: _____ Discharge Type: _____ Dates of Service: _____ Rank/Rate: _____	
Contact Information: () _____ E-Mail: _____	
Home <input type="checkbox"/> Cell Phone <input type="checkbox"/>	
How can we help you today? _____	
Have you ever served on active duty in any branch of the Armed Forces, or are you a Transitioning Service Member, Wounded Warrior, Spouse or Family Caregiver of a service member or veteran? If so you may be entitled to additional services if you can attest to at least one of the criteria below;	
1. Are you a special disabled or disabled veteran whereas you are: Entitled to compensation (or who but for the receipt of military retired pay would be entitled to Compensation)? or _____ <input type="checkbox"/> Yes <input type="checkbox"/> No Have a claim pending with the VA; or _____ <input type="checkbox"/> Yes <input type="checkbox"/> No Were discharged or released from active duty because of a service-connected disability? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No 2. Are you homeless or without a permanent residence? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No 3. A recently-separated service member, (Within 3 years of End of Active Service) who at any point in the previous 12 months has been unemployed for 27 or more weeks? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No 4. An offender, who is currently incarcerated or has been released from custody? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No 5. Are you in need of a high school diploma or equivalent certificate? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No 6. Low-income (as defined by the State.(See attached chart)? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No 7. Are you between the ages of 18 and 24? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No	
OTHER ELIGIBLE (Section B)	
1. Are you a Transitioning Service Member with any of the criteria as defined in section A? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No 2. Do you have a letter from the VA stating you are an eligible spouse? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No 3. Does your spouse have a total disability from a service-connected disability? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No 4. Has your spouse been listed as forcibly detained or interned by a foreign government or power, missing in action, or captured in line of duty for a total or more than 90 days? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No 5. Are you the surviving spouse of a veteran who died of a service-connected disability as evaluated by the VA or while having a total permanent service-connected disability? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No 6. Are you a "Wounded Warrior" currently in a treatment Facility or a Caregiver of one? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No	
MILITARY DOCUMENTS	
1. Do you need to obtain a DD214? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No 2. Did you receive a DD2958 Service Member Career Readiness Standard/Individual Transition Plan? _____ <input type="checkbox"/> Yes <input type="checkbox"/> No	

Youth Eligibility

Effective Date: November 15, 2022

Duration: Indefinite

Purpose: To establish policy to provide guidance on WIOA Title I youth program eligibility requirements, policies, and procedures consistent with state and federal requirements and to define “requires additional assistance to enter or complete an educational program, or to secure or hold employment.”

Policy: Youth must meet eligibility requirements to participate in the WIOA Title I youth program. WIOA section 129(a)(1) establishes separate criteria for out-of-school youth (OSY) and in-school youth (ISY).

WIOA Section 129(a)(1)(B) defines OSY as an individual who is:

1. not attending any school (as defined under State law);
2. not younger than age 16 or older than age 24; **and**
3. one or more of the following:
 - a. a school dropout.
 - b. a youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter.
 - c. a recipient of a secondary school diploma or its recognized equivalent who is a **low-income individual** **and** is (a) basic skills deficient; **or** (b) an English language learner.
 - d. an individual who is subject to the juvenile or adult justice system.
 - e. a homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))), a homeless child or youth (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))), a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement.
 - i. Or, per [20 CFR 681.210](#), an individual who has attained 16 years of age and left foster care for kinship guardianship or adoption.
 - f. an individual who is pregnant or parenting.
 - g. a youth who is an individual with a disability.
 - h. a **low-income** individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

WIOA Section 129(a)(1)(C) defines ISY as an individual who is:

1. attending school (as defined by State law);
2. not younger than age 14 or (unless an individual with a disability who is attending school under State law) older than age 21;
 1. a low-income individual; **and**
 2. one or more of the following:
 - a. Basic skills deficient.
 - b. An English language learner.
 - c. An offender.
 - d. A homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))), a homeless child or youth (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))), a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement.
 - i. Or, per [20 CFR 681.220](#), an individual who has attained 16 years of age and left foster care for kinship guardianship or adoption.
 - e. Pregnant or parenting
 - f. A youth who is an individual with a disability.

- g. An individual who requires additional assistance to complete an educational program or to secure or hold employment.

Additionally, eligible youth must also be a citizen or national of the United States, lawfully admitted permanent resident alien, refugee, asylum, and parolee, and other immigrant authorized by the Attorney General to work in the United States. Before enrollment in WIOA Title I funded services, all males who are at least 18 years old and have not reached their 26th birthday must be registered with Selective Services. If a male turns 18 while participating in any applicable services, registration with Selective Service must be completed no later than 30 days after he becomes 18 in order to continue to receive WIOA Title I funded services. If a man under the age of 26 refuses to register with Selective Service, WIOA Title I funded programs must be suspended until he registers. For transgender customers, compliance with selective service is predicated on the individual's gender as assigned at birth/as recorded on a birth certificate.

Documentation of Participant Eligibility

Documentation is necessary to support WIOA Title I youth eligibility. Staff must verify and confirm that youth are eligible to participate in WIOA youth services through an examination of documents which must be stored electronically by uploading the documents into the participant's file in Jobs4TN. Documentation must be available to program staff, fiscal monitors, and auditors for monitoring purposes. A case note may be added with the documentation indicating the eligibility requirement that the document is supporting. Records must be maintained for a period of at least five (5) years after the submittal of the final closeout expenditure report for that funding period by the Board's Fiscal Agent.

Determining School Status

To determine school status for youth participants, service provider staff must follow the below definitions provided in the Workforce Services Policy – Youth Eligibility:

School: Any secondary or postsecondary school as defined by the applicable State law or secondary and postsecondary institutions. For purposes of WIOA, the Department does not consider providers of adult education under WIOA Title II, YouthBuild programs, Job Corps program, high school equivalency programs, or dropout re-engagement programs to be schools. Youth attending high school equivalency programs funded by the public K-12 school system who are classified by the school system as still enrolled in school are an exception; they are considered in-school youth.

Attending School: An individual is considered to be attending school if the individual is enrolled in a secondary school or registered for credit-bearing courses at a postsecondary institution. Such schools and/or institutions include, but are not limited to: Tennessee Colleges of Applied Technology, community colleges, four (4) year college/university, traditional K-12 public and private, and alternative schools (e.g. continuation, magnet, charter, and home schools). AJC staff must evaluate the following at the time of enrollment:

- If the youth is enrolled in the WIOA youth program during the summer and is in between school years, the youth is considered in-school youth if they are enrolled to continue school in the fall.
- If a youth is enrolled in the youth program between high school graduation and postsecondary education, the youth is considered an in-school youth if they are registered for postsecondary credit-bearing courses, even if they have not yet begun postsecondary classes at the time of enrollment.
 - If the youth does not follow through with attending postsecondary education, then such a youth would be considered an out-of-school youth if the eligibility determination is made after the point that the youth decided not to attend postsecondary education.
- Postsecondary courses must be credit-bearing classes. An individual attending non-credit bearing, post-secondary classes (e.g. remedial courses) are to be considered out-of-school youth.

Not Attending School: An individual who is not attending a secondary or postsecondary institution.

Alternative School: A non-traditional academic program or school designed to meet the student's educational, behavioral, and social needs for students in grades seven (7) through twelve (12).

Determining Basic Skills Deficiency

A youth that has English reading, writing, or computing skills at or below the 8th grade level on a generally

accepted standardized test or a youth or adult who is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society, is considered basic skills deficient. If an individual is found to be basic skills deficient, this must be recorded in Jobs4TN. Testing for basic skills deficiency based on grade level is recommended to be done through the Tennessee Department of Adult Education when applicable. When testing through the TN Department of Adult Education is not applicable, local providers are permitted to administer testing. Formalized testing instruments that are valid, reliable, appropriate, fair, cost effective, well-matched to the test administrator's qualifications, and easy to administer and interpret results must be used with approval of the Board. Assessment instruments must also be appropriate for the target population, and reasonable accommodations must be provided in the assessment process, if necessary, for individuals with disabilities.

Assessing whether a youth or adult is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society may be accomplished using formalized testing as described above, or it may be determined through:

- Staff observation, such as witnessing an individual experience difficulty in reading or writing on enrollment forms or computing or solving mathematical programs. Specific staff observation(s) of the basic skills deficiency must be documented in case notes.
- Workplace assessments, such as the National Career Readiness certificate
- Applicable records from an education institution, such as transcripts, academic assessments, or other school documentation such as records [ACT scores below minimum benchmarks](#) or remedial classes may also be utilized to document skills below those necessary to function on the job or in society.

Determining Low Income Status

WIOA Section 3(36)(A) defines a low income individual as someone who:

1. (i) receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the supplemental nutrition assistance program established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), the program of block grants to States for temporary assistance for needy families program under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), or the supplemental security income program established under title XVI of the Social Security Act (42 U.S.C. 1381 et seq.), or State or local income-based public assistance;
2. is in a family with total family income that does not exceed the higher of (I) the poverty line; or (II) 70 percent of the lower living standard income level;
3. is a homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), or a homeless child or youth (as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)));
4. receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.);
5. is a foster child on behalf of whom State or local government payments are made; or
6. is an individual with a disability whose own income meets the income requirement of clause (ii), but who is a member of a family whose income does not meet this requirement.

Low Income Youth Living in a High-Poverty Area: Per WIOA section 129(a)(2), for the purpose of WIOA section 129(a)(1), the term "low-income", used with respect to an individual, also includes a youth living in a high-poverty area. As stated in TEGL 21-16, the WIOA regulations at 20 CFR § 681.260 define high-poverty areas as a Census tract, a set of contiguous Census tracts, an American Indian Reservation, Oklahoma Tribal Statistical Area (as defined by the U.S. Census Bureau), Alaska Native Village Statistical Area or Alaska Native Regional Corporation Area, Native Hawaiian Homeland Area, or other tribal land as defined by the Secretary in guidance or county that has a poverty rate of at least 25 percent as set every 5 years using American Community Survey 5-Year data.

If the entire county does not have at least a 25% poverty rate, individual and / or contiguous Census tracts with at least a 25% poverty rate may also be considered a high poverty area. All of the individual Census tracts within the contiguous target area do not have to have a 25% poverty rate as long as the overall set of Census tracts

within the contiguous area have an overall poverty rate of 25%. More than one high-poverty area may be identified as long as the Census tracts within each high-poverty area are contiguous. For example, a high poverty area can be established in the West side of town and a high poverty area in the South side of town, as long as the Census tracts within the West side poverty area are contiguous with each other and the Census tracts within the South side poverty area are contiguous with each other. Poverty rates of Census tracts may be found at <https://www.census.gov/data.html>.

Once Census tracts have been identified as high-poverty, as an individual tract or part of contiguous tracts with an overall rate of 25% or more, it is necessary to document that a youth applicant lives in a high-poverty area and therefore meets the low-income criteria. AJC staff must determine the Census tract in which the applicant's street address is located at: <https://geocoding.geo.census.gov/geocoder/geographies/address?form>. Once the Census tract of the applicant's residence is identified, it can be compared to high-poverty Census tracts as identified above. Documentation that the Census tract qualifies as part of a high-poverty area and that the applicant's residence is within such as tract must be maintained in the participant's electronic case file.

WIOA Section 3(36)(B) defines lower living standard income level as that income level (adjusted for regional, metropolitan, urban, and rural differences and family size) determined annually by the Secretary of Labor based on the most recent lower living family budget issued by the Secretary.

Five-Percent Low-Income Eligibility Exception: As described in 20 CFR 681.250(c), WIOA allows a low-income exception where five (5) percent of WIOA youth may be participants who ordinarily would be required to be low-income for eligibility purposes and meet all other eligibility criteria for WIOA youth except the low-income criteria. A program must calculate the five (5) percent based on the percent of newly-enrolled youth in the Local Workforce Development Area's WIOA youth program in a given program year who would ordinarily be required to meet the low-income criteria. It is not based on all youth since many of the OSY categories do not require low-income status. Because not all OSY are required to be low-income, the five (5) percent low-income exception under WIOA is calculated based on the five (5) percent of youth enrolled in a given program year who would ordinarily be required to meet the low-income criteria.

Income Calculations: In order to determine if a youth applicant is in a family with total family income that does not exceed the higher of (I) the poverty line or (II) 70 percent of the lower living standard income level, actual total family income received by the applicant and all members of his / her family living in the household during the six-month period prior to the application date must be collected. All income earned and unearned income, unless specifically excluded per TEGL 19-16 or TEGL 21-16, is considered in determining monthly gross income. Income may be received periodically or at irregular intervals.

WIOA staff members must always obtain ample information to account for all income received during the six-month period prior to the application date, or information on how the family has been supported in the absence of income and / or public assistance (i.e. Food Stamps, Unemployment Insurance, etc.). When completing income computation, WIOA staff should use the following order for obtaining income documentation:

- (1) Actual Six Months of Income (e.g. six months of paystubs or employer statement)
- (2) Best Available Documentation (e.g. any available paystubs or Employment Security Wage Report)
- (3) Third Party Support

Method #1, actual six months of income, is always the best method and there should be very few cases in which six months of actual income is not used for income computation. If six months of actual income is not used for income computation, then staff must enter a very detailed case note justifying why method # 2 (Best Available Documentation such as any available paystubs or Employment Security Wage Report) is used and not method # 1. If method # 3 (Third Party Support) is used instead, staff must enter a very detailed case note justifying why method # 3 was used and not method # 1 or # 2.

Actual Income Verification: The Employment Verification Form for Eligibility, a statement from the employer of income between the application date and six months prior to the application date, or paystubs or other wage reports for the entire six-month period may be used to document actual income earned during the six-month period prior to the application date. The total gross income for the six-month period must be included in

income computation, including any overtime, allowances, tips, or bonuses. All documents should have the person's name, the date(s) of the pay period, and the amount of income before deductions.

Best Available Documentation: If the income documentation provided does not reflect an accurate account of the income over the past six months (i.e. worked different jobs, had no income for a period of time, etc.), WIOA staff members should (a) call the applicant or parent/guardian to gather more income information to help determine eligibility (i.e. additional paystubs); (b) prorate year to date (YTD) amount from paystubs that include the entire six month pay period (see below for instructions on using YTD wages); (c) request wage information from Employment Security staff if available; or (d) obtain a Third Party Support Form. Ultimately, the responsibility is on the applicant/parent to supply adequate information to determine eligibility.

In the event that actual income verification for the past six months cannot be supplied by the applicant or employer, income documentation that includes at a minimum the most recent 30-days income (earned and unearned) for all family members in the household ~~can be used~~ may be used as an exception to compute income for the six-month period prior to the application date using prorated year-to-date (YTD) wages. The more income data available for the six-month time period, the better the documentation (multiple paystubs, although not consecutive for the entire period, may give a better picture). In order to use YTD information WIOA staff must determine the hire date and determine how many weeks of pay is represented by the YTD figure. The YTD amount should then be divided by the number of weeks represented, or the number between the first of the year or the hire date, whichever is more recent, and the end date of the most recent pay period as seen on the participant's paystub to identify an average weekly pay amount. The average weekly pay amount must then be multiplied by 26 weeks to determine the income amount for the six-month period prior to the application date. Any other income received during the six-month period by family members living in the household must also be included in the income computation.

Self-Employment: For self-employed individuals who have filed their taxes, the most recent tax return (not to be over 13 months old) of the self-employed individual is to be used to determine wages for the previous year. The amount in line will then be divided by 2 to determine the amount for the six-month period. The individual who is self-employed must also provide a signed attestation that nothing has occurred since the last income tax return period being supplied with the application that has or will significantly change the applicant's financial situation. Income of other family members of the household (if applicable) will also need to be documented and included in the income computation. For self-employed individuals who are not required to file taxes, a Personal Services Employment Verification Form may be used to document cash income (e.g. housecleaning, babysitting, dog-walking, etc.).

Other Means of Support: For families without includable income or public assistance, or those with gaps in income during the six months, information must be gathered to determine how the family supported themselves. A Third Party Support Form may be used to show how the applicant was supported. When using a Third Party Support Form, the person who is providing support to the applicant, who cannot be a family member as defined above, must list all the types of support provided to the applicant in a month on the form. Support received is not counted as income. Any income of family members living in the household must be included in income computation. If during gaps in employment a family member was relying on the income of other members of the family, staff must document this in the eligibility case note. The income of the family members must be included in income computation. If the family is being supported by exclusionary income, documentation must be obtained and a copy uploaded to the participant's file.

Determining Family Size: Income from individuals living in the household who do not meet the definition of "family" will not be included in income computation. Per [20 CFR § 675.300](#), family means two or more persons related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories:

- (A) A married couple and dependent children.
- (B) A parent or guardian and dependent children.
- (C) A married couple.

Since parents are included in the definition of family, when an applicant lives in the same household as his/her parents, the income of the parents shall be included in determining low-income status and eligibility, unless:

- a) The applicant is a parent/guardian, living with his / her child within his / her parents' household, and is not claimed as a dependent on the most recent tax return of his / her parents (a copy must be maintained in the participant's file), whereby the applicant and his/her children comprise a separate family unit within the household; or
- b) The applicant is married but lives with parents, and is not claimed as a dependent on the most recent tax return of his / her parents, parents (a copy must be maintained in the participant's file) whereby the applicant and his/her spouse are considered a separate family unit within the household.
- c) The applicant lives with his / her parent or guardian is not claimed as a dependent on the most recent tax return of his / her parents (a copy must be maintained in the participant's file).

When an individual has a disability for which documentation can be obtained, the income for such individual shall exclude the income of any and all other members of the family. Acceptable documentation shall include a written statement from Vocational Rehabilitation reflecting current services, verification showing current receipt of SSI or SSD for the individual from the Social Security Administration, or a letter from a local education entity stating the individual has an IEP along with a signed attestation from the youth applicant and his/her parents/guardians, when applicable due to the applicant's age, that the IEP is based on a disability.

Needs Additional Assistance Definition

Each LWDB must define in its local plan and local policies the criterion of "requires additional assistance to complete an educational program, or to secure and hold employment" for OSY and ISY. LWDBs must include evidence supporting the established criteria ensure regional alignment to the best of their abilities, which may include most current labor market information, statistical evidence, and other data deemed supportive. Documentation required from participants to support established criteria must also be identified.

According to the Office of Disease Prevention and Health Promotion (ODPHP)'s website, "Many factors can contribute to inequitable access to resources and opportunities, which may result in poverty. Marital status, education, social class, social status, income level, and geographic location (e.g., urban vs. rural) can influence a household's risk of living in poverty. For example, in 2012, 17.7% of people in rural areas were living in poverty, compared to 14.5% of people in urban areas. Racial and ethnic minorities are more likely than non-minority groups to experience poverty at some point in their lives. In addition, children from families that receive welfare assistance are 3 times more likely to use welfare benefits when they become adults than children from families who do not receive welfare. Studies also report that migrant status is a risk factor for poverty."

As ~~shown mentioned above, as of 2018~~, the U.S. Census Bureau's American Community Survey 5-Year data showed poverty rates for the NW area between ~~11.9% and 27.5%~~ ~~17.1% and 26.9%~~. A rate of at least 20% is categorized by the U.S. Census Bureau as a poverty area, while 20 CFR § 681.260 defines a high poverty area as an area that has a poverty rate of at least 25%. ~~If the entire county does not have at least a 25% poverty rate, individual and / or contiguous Census tracts with at least a 25% poverty rate may also be considered a high poverty area. Benton, Obion, and Weakley counties are considered poverty areas while~~ Lake County is considered a high poverty area. The NW area also has median household incomes below the national average and significant percentages of children in poverty, ~~ranging from 15.6% to 37.3%. and female householders with no husband present, and non family households. Although small, each county also has a presence of foreign-born individuals.~~

County Name	% Poverty Level	% Children Under 18 Poverty Level	Median Household Income
Benton	12.3%	15.6%	\$39,019
Carroll	11.9%	21.1%	\$42,877
Crockett	12.0%	25.7%	\$47,581
Dyer	12.1%	19.6%	\$45,042

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Gibson	12.7%	19.1%	\$45,557
Henry	15.6%	33.1%	\$41,037
Lake	27.5%	37.3%	\$34,230
Obion	13.8%	26.1%	\$39,985
Weakley	13.7%	28.6%	\$41,488

Source: Community Indicators Map, Economic Modeling Systems, Inc. (from the Census's American Community Survey 5-year estimates)

County Name	Median Household Income	% Children Under 18 Poverty Level	% Foreign-Born Population	% Male Householder, No Wife Present, Family Households	% Female Householder, No Husband Present, Family Households	% Non-Family Households
Benton	\$33,125	25.3%	1.1%	4.2%	11.4%	40.7%
Carroll	\$40,810	25.2%	0.9%	4.5%	12.7%	32.8%
Crockett	\$42,047	28.7%	4.2%	3.7%	12.7%	33.6%
Dyer	\$43,762	24.3%	1.9%	6.0%	15.3%	29.1%
Gibson	\$41,886	24.8%	1.2%	3.5%	15.9%	32.4%
Henry	\$40,837	30.9%	1.3%	3.4%	12.9%	31.8%
Lake	\$34,966	40.1%	0.7%	5.9%	20.9%	33.3%
Obion	\$39,866	33.2%	1.8%	5.2%	12.5%	32.9%
Weakley	\$38,566	25.6%	1.7%	5.3%	9.8%	36.2%

Furthermore, according to the Tennessee State Plan for 2020-2023, unemployment rates among youth (ages 16 to 24 years old) are higher in the West region at 18.45%, more than five times the overall state rate.

Based on the above labor market information, statistical evidence, Training and Employment Notice 22-19 - Technical Assistance Resources for the Workforce Innovation and Opportunity Act (WIOA) Youth Program, and other relevant experience in serving the youth population, the ~~Northwest TN~~ Local Workforce Development Board, in consultation with the Chief Local Elected Officials, has adopted the below criterion for Youth- “requires additional assistance to enter or complete an educational program, or to secure or hold employment” in an effort to increase the likelihood of participants’ educational and occupational success, and reduce the likelihood of participants entering or remaining in poverty:

REQUIRES ADDITIONAL ASSISTANCE FOR BOTH OSY AND ISY:

1. Educational Barriers – as documented by school or testing agency records
 - a. Has been placed on probation, suspended, or expelled from school at least within the last 12 calendar months
 - b. Has repeated at least one secondary grade level
 - c. Has or has previously had below average grades or an ACT/SAT score below the college readiness range
 - d. ~~Is attending an alternative school (in-school youth)/education program~~ or has been enrolled in an alternative school within the past 12 months (out-of-school)
2. Employment Barriers – as documented on the participant’s application
 - a. Little or no successful work experience or has never held a job
 - b. Has been fired from a job in the last 12 calendar months
 - c. Has a family history of chronic unemployment and / or long-term use of public assistance
 - d. Has experienced an unsuccessful work search or little to no exposure to successfully employed adults
 - e. Has, or is a member of a family who has, a poor work history, to include no work history, long-term unemployment, significant gaps in employment, or sporadic work history
3. Living Arrangements – as documented on the participant’s application, assessment, and / or case notes
 - a. Has been previously placed in out-of-home care (foster care, group home, or kinship care)
 - b. Lives in a home with parents who have limited English proficiency or the primary language spoken in the home is not English
 - c. Lives with only one or neither of his/her natural parents
 - d. Lives in public housing

- e. Lives in a poverty area (poverty rate \geq 20%), federally-designated high poverty area (poverty rate \geq 25%), or an at-risk or distressed county per the Appalachian Regional Commission (ARC)
- 4. Medical/Social/Family Barriers – as documented on the participant’s application, assessment, and / or case notes
 - a. Lacks parental support
 - b. Has emotional, medical, physical, cognitive, or psychological impairment which creates a significant impediment to employment
 - c. Has been referred to, is being treated by, or has previously been treated by an agency for substance abuse
 - d. Has experienced recent traumatic events, is a victim of a crime or abuse, or resides in an abusive environment as documented by a school official or other professional
 - e. Faces significant personal challenges including dysfunctional domestic situations, lack of supportive services or transportation, documented behavioral problems, and substance abuse by the youth or a family member
 - f. Is, or is a member of household, receiving assistance to meet basic needs such as food and shelter
 - g. Has currently or formerly incarcerated parent(s) or guardians
 - h. Has parents who lack a high school diploma or equivalent
 - i. Potential first-generation postsecondary student
 - j. Emancipated youth
 - k. Immigrant, refugee, or migrant youth
 - l. **Involved in gang activity**

REQUIRES ADDITIONAL ASSISTANCE for Out-of-School Youth only – as documented by school records or the participant’s application:

- a. Has dropped out of postsecondary educational program as documented by school records
- b. Has not enrolled in postsecondary school or entered a career path within one year of completion of secondary school to include lack of full-time employment or history of employment with earnings below self-sufficiency guidelines
- c. Has never held a full-time job (aged 18+ only)
- d. Has received court agency/referrals mandating school attendance
- e. Has been unemployed six months out of the last two years (aged 18+ only)
- f. **Has neither the work experience nor the credential required for an occupation in demand for which training is necessary and will be provided.**

REQUIRES ADDITIONAL ASSISTANCE for In-School Youth only – as documented by school or court records:

- a. Has poor attendance patterns in an educational program during the last 12 months
- b. Has documented behavioral problems at school
- c. Is deemed at risk of dropping out of school by a school official
- d. Is required to enroll in remedial or development coursework in postsecondary
- e. Grade Point Average of less than 2.0 In school (secondary or postsecondary)
- f. One or more years behind modal grade for one’s age group

Five-Percent Additional Assistance Barrier Limitation for ISY: WIOA section 129(a)(3)(B)(1) states that in each LWDA, **not more than five (5) percent of the ISY assisted may be eligible due to the barrier of requiring additional assistance to complete an educational program or to secure or hold employment.** States and local areas must ensure that in a given program year, no more than five (5) percent of ISY enrolled in the program year are eligible only based on the “additional assistance” criterion. The five (5) percent limitation criterion for additional assistance applies to ISY only.

In order to ensure compliance with the five (5) percent ISY limitation and that ISY who are most in need are served in the WIOA youth program, the **Northwest areas LWDA**s focuses on serving ISY who are eligible based on criteria other than the “requires additional assistance” criterion, such as homeless youth, foster youth, youth with a disability, and youth offenders. In addition, the service provider must request approval for any ISY

enrollments using the needs additional assistance criterion so that the Board staff can track the number of newly-enrolled ISY in this category in a given program year.

Reference: WIOA section 129(a)(1)(B) and (C), WIOA Section 3(36)(A) and (B), WIOA section 129(a)(2), 20 CFR § 681.260, 20 CFR 681.250(c), WIOA Section 129(a)(3)(B)(1), WIOA Section 188(a)(5), TEGL 19-16, TEGL 21-16, ODPHP: <https://www.healthypeople.gov/2020/topics-objectives/topic/social-determinants-health/interventions-resources/poverty>

Related TDLWD Policy: Youth Eligibility Policy

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

Jimmy Williamson, Chair
Northwest Tennessee Workforce Board

Youth Program Design and Incentives

Effective Date: November 15, 2022

Duration: Indefinite

Purpose: To outline the required program framework for youth programs funded in whole or in part under Title I of WIOA and provide guidance for providing incentives for eligible Youth participants.

Policy: Funds allocated to a local area for eligible youth must include programs that provide assessments and develop service strategies linked to indicators of performance. The Youth program and service provision, under Title I of the Workforce Innovation and Opportunity Act (WIOA), is designed to:

- Assist eligible out-of-school youth (OSY) and eligible in-school youth (ISY), who are seeking assistance in achieving academic and employment success, with effective and comprehensive services and activities that include a variety of options for improving educational and skill competencies and provide an effective connection to educational institutions and employers, including small employers in in-demand industry sectors and occupations in the local and regional labor markets.
- Implement integrated strategies for career pathway approaches that support post-secondary education, training, and employment.
- Implement work-based training strategies and employment approaches to help participants develop essential skills that are best learned on the job.
- Implement progressive levels of education and training approaches that will help individuals with higher skill levels and experience earn marketable credentials.
- Provide continued support services to individuals who need them to participate and succeed in work investment and training activities.

Program Design

Program design is an essential element to assist youth service providers to develop comprehensive service strategies based upon an individual needs. Local Workforce Development Boards (LWDBs) must develop intensive outreach efforts to non-profits, community groups, faith-based agencies, schools, and other support agencies who can provide youth services. Access points must be developed in high school libraries with staff trained to assist youth in accessing all available services. Outreach programs must be implemented that will target populations with barriers to employment (including, but not limited to, offenders, homeless individuals, basic skills deficient, English language learners, individuals aging out of foster care, pregnant or parenting individuals, and persons with disabilities).

Service delivery will be based upon the following program components:

- Preparation for postsecondary educational opportunities;
- Occupational training services (that lead to the attainment of a recognized credential);
- Work-based opportunities;
- Youth development services; and
- Employment services

In order to support the attainment of a secondary school diploma or its recognized equivalent, or entry into postsecondary education and career readiness for participants, all youth programs shall provide services consisting of the required 14 Youth program elements as described in WIOA Section 123. Youth participants must be made aware of all available services, and the providing of the information must be documented in the participant's case file in Jobs4TN. When procuring a Youth service provider, the LWDB will follow all requirements as outlined in applicable Workforce Services policies, which shall include bidders providing a detailed outline of how the youth elements identified in the request for proposal (RFP) will be executed, including any leveraging of community-based resources, such as partnerships with organizations that provide leadership development, mentoring services, and private sector employment involvement.

Per TEGL 21-16, as discussed in 20 CFR § 681.430, "individuals who meet the respective program eligibility requirements may participate in WIOA Title I Adult and Youth programs concurrently. Such individuals must be eligible under the Youth or Adult eligibility criteria applicable to the services received. Local program operators may determine, for these individuals, the best mix of services under the Youth and Adult programs." While some 18 to 24 year olds may be ready for Adult services due to life experiences such as having gained occupational skills through education or training, prior work experiences, adult schedules, family responsibilities, and the participant's needs, others need specific Youth services covered in the 14 WIOA Youth program elements based on characteristics such as maturity, drug and alcohol abuse, homelessness, foster care status, family abuse/neglect, literacy challenges, pregnancy, and lack of employability skills. Assessments of their skills, career-readiness, literacy, and supportive service needs should be taken into consideration when determining the appropriate program(s) for young adults.

Intake & Assessment

An orientation process must be provided to each potential eligible youth participant. Orientation must include information on the services that are available within the WIOA Title I youth program and the One-Stop Service Delivery system in the local area. These services may include, but are not limited to:

- Orientation/introduction of the program purpose
- All program services and resources available
- Responsibilities of other service providers
- Program participant's responsibility
- Information on follow-up services
- Information on support services
- Referral to other appropriate services

Intake involves registration, eligibility determination, and collection of documentation to support verification of eligibility for services. Other services also include referral for basic skills development and referral to other services as appropriate.

Assessment is a process that identifies service needs. An objective assessment must be administered to all eligible youth. The WIOA youth program design requires an objective assessment of academic levels, goals, interests, skills levels, abilities, aptitudes, and supportive service needs; it also measures barriers and strengths. Assessment results are used to develop the Individual Service Strategy (ISS). The results from the objective assessment must be entered into Jobs4TN.

Individual Service Strategy (ISS)

Based on the comprehensive intake and assessment process, Title I staff develop an Individual Service Strategy (ISS) with participants to identify their employment and / or educational goals and objectives, which must be specific, measurable, achievable, relevant, and timely (SMART), directly linked to one or more of the indicators of performance, and aligned to the interests and career pathway identified in the objective assessment. The ISS must also document the specific program elements and services to be provided to the participant based on the results of the objective assessment and the participant's SMART goals / objectives. A new service strategy for a participant is not required if the provider carrying out such a program determines it is appropriate to use a recent service strategy developed for the participant under another education training program.

Career Coaching & Case Management

Although not a specific element, Title I staff must provide case management services to assist a youth participant in making informed choices and completing the program. Case management typically includes non-instructional activities, such as navigation to and arrangements for academic, career or personal counseling, financial aid, childcare, housing, and other financial assistance that can be critical to the success and continued engagement of the individual in pursuing their career pathway component. Youth service providers must provide case management services to assist a youth participant in making informed choices and completing the program. Support may be provided on an individual or group basis and career coaching principles and methods must be incorporated throughout the program.

Documentation of all services and activities must also be recorded in the participant's case file in Jobs4TN. Participants must be contacted at least monthly, and contacts must be documented in case notes in Jobs4TN. Recording case notes is critical because it weaves each service element into the comprehensive service plan.

Case notes, at minimum, must reflect who was assisted, why, when and where the contact occurred and must be entered promptly with detailed information.

Supportive Services

Youth providers must provide supportive services to eligible youth participants that are necessary to enable an individual to participate in youth activities authorized under Title I of WIOA. The LWDB's Supportive Services policy outlines allowable support services and the procedures for administering and participants receiving supportive services.

Youth Incentives

Under WIOA, a much higher percentage of available local Youth funds must go toward OSY — 75% (versus 30% under WIA). Strategies for recruiting and serving more of these young people must be a focus more than ever before. While OSY who are not working, often referred to as “disconnected” or “opportunity” youth, may seek out opportunities to connect to training and work, according to MDRC's [Serving Out-of-School Youth Under the Workforce Innovation and Opportunity Act \(2014\)](#), “youth programs often report difficulties in sustaining participation after the initial connection is made. WIOA-funded service providers will not only have to reach more out-of-school youth, they will also need strategies to stimulate sustained, intense engagement in services.” According to the report, the presence of the following elements indicate that young people are more likely to engage:

1. Financial incentives and opportunities for paid training and work.
2. Opportunities to feel connected to caring adults and to a community.
3. Support services that address a young person's barriers to participant.

The report states “Incentives and stipends are a key form of positive reinforcement to sustain motivation, especially when tied to benchmarks such as earning academic credentials or acquiring specific competencies. They also can be an important source of support to meet the economic challenges these young people face.” 20 CFR § 681.640 and TEGL 21-16 indicate that incentive payments to youth participants are permitted as an allowed payment for recognition and achievement directly tied to work experience, education, and training. Incentive payments must be:

1. Tied to the goals of the specific program;
2. Outlined in writing before the commencement of the program that may provide incentive payments;
3. Align with the local program's organizational policies; and
4. Offered in accordance with the requirements contained in 2 CFR part 200. For example, Federal funds must not be spent on entertainment costs. Therefore, incentives must not include entertainment, such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment. Additionally, there are requirements related to internal controls to safeguard cash, which also apply to safeguarding of gift cards, which are essentially cash.

TEGL 21-16 also states that while the DOL recognizes that incentives could be used as motivators for various activities such as recruitment, submitting eligibility documentation, and participation in the program, incentives paid for with WIOA funds **must** be connected to recognition of achievement of milestones in the program tied to work experience, education, or training. Such incentives for achievement could include improvements marked by acquisition of a credential or other successful outcomes. Incentive payments may be provided to both ISY and OSY as long as they comply with the requirements of 20 CFR § 681.640.

To increase engagement among young people, provide positive reinforcement to sustain motivation, increase educational attainment and self-sufficient employment, and help support participants in facing economic challenges, the following incentives will be offered to Youth participants:

Work Experience Incentives	Amount
Successful completion of the first 2 weeks of paid work experience	\$50
Successful completion of the first 4 weeks of paid work experience	\$100

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Additionally, for Youth participants who are, have been, or will be participating in work experience, education, training, or other workforce preparation activities, and who are in need of a high school equivalency diploma, the following incentives will also be offered:

Attending 4 HiSet classes after orientation totaling 12 class hours	\$100
Completion of the HiSET voucher	\$150
Completion of the HiSET	\$250

For OSY work experience participants, the following incentive will also be offered:

Transitioning into postsecondary during participation or within 2 quarters after exit	\$50
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Credential Attainment Incentives

Amount

Attainment of a credential during participation or within 1 year after exit	\$100
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As part of the Work Ready Community (WRC) initiative, which seeks designation as a regional economy with a pool of qualified workers, area residents must achieve the necessary levels on the ACT assessment to be granted a National Career Readiness Certificate (NCRC). By achieving an NCRC, participants are able to demonstrate their employability skills to potential employers who may prefer or require the assessment for entry into a position. Youth participants who may benefit from earning an NCRC, as determined through the assessment process, may earn the following incentive:

Attainment of a National Career Readiness Certificate (NCRC)	\$25
Improved NCRC Certificate Level	\$25

Note: Participants may only receive an improved NCRC certificate incentive payment if there is a documented need for a higher NCRC level (e.g. a position requires a higher level, the participant is seeking to enter into training for an occupation that typically requires a higher level, etc.).

Placement in Postsecondary / Employment Incentives

Amount

Placement in regular part-time or full-time employment for each quarter after exit OR	\$100 / Qtr (\$400 total)
For individuals originally enrolled as ISY in secondary school or OSY for non-occupational skills training or related services, placement in postsecondary training program for each quarter after exit	\$100 / Qtr (\$400 total)

Note: Participants can only earn one of the two placement incentives per quarter and cannot exceed \$400 total for four quarters. For instance, a participant who is both employed and enrolled in postsecondary training during a quarter after exit may only receive one \$100 incentive payment for that quarter. Participants can receive a combination of employment and postsecondary placement incentives throughout the four quarters. For instance, a participant may earn a postsecondary placement incentive for the first two quarters, and an employment incentive for the last two quarters.

Supporting documentation is required for payment of these incentives and must be uploaded into VOS. Supporting documentation may include pay stubs, postsecondary acceptance letter/schedule, transcripts, diploma, Ged/HiSet, High school diploma, postsecondary credential, certificate, or copy of licensure, and/or ACT NCRC scores. Incentive payments to participants must be issued in the form of check or direct deposit, in order to ensure proper internal controls in accordance with 2 CFR part 200, and recorded properly in VOS. At the request of the Career Service Provider, an alternate payment system may be approved by the Executive Director, in consultation with the Board Chair, if proper internal controls have been established and can ensure safeguarding of incentive payments. Availability of incentives is contingent upon funding levels, and this policy may be suspended by the Executive Director, with approval of the Board Chair, to accommodate decreases in funding.

Common Exit

A common exit occurs when a participant enrolled in multiple partner programs, to include Title I, Title III, Trade Adjustment Act / Trade and Globalization Adjustment Act, and Jobs for Veterans State Grants, has not received services from any of the applicable programs in which the participant is enrolled for at least 90 days, and no

future services are planned. In accordance with Workforce Services Policy – Common Exit from WIOA Partner Programs, in order for staff to properly and timely exit participants, they are required to follow up with participants every 30 days. A detailed description of contact and contact attempts must be documented in case notes, included the intention of the contact. In the event the participant is unable to be reached, staff should do a follow-up contact every five days from the date of the missed contact until contact is made. If staff is unable to reach the participant on the second contact attempt via phone or primary method, then he / she should make every effort to use alternative contact methods (i.e. social media, Facebook, alternative contacts, email, etc.), not to exceed 90 days. If after all contact attempts during the 90-day period the staff is unable to reach the participant, he/she should close all open activities and create a closure with the appropriate closure reason.

Follow-Up Services

Follow-up services are critical services, provided for no less than 12 months, following a youth participant's exit from the program. These services help ensure the youth is successful in employment and/or postsecondary education and training beyond their program completion. The youth service provider must establish and implement procedures to ensure that follow-up services are conducted and documented in Jobs4TN in accordance with the below guidelines:

1. At the time of enrollment, youth must be informed that follow-up services will be provided for 12 months following exit.
2. If at any point in time during the program or during the 12 months following exit the youth requests to opt-out of follow-up services, they may do so. In this case, the request to opt-out or discontinue follow-up services made by the youth must be documented in case notes.
3. Follow-up services must include more than only a contact attempted or made for securing documentation to report a performance outcome.
4. In the event a participant cannot be located or contacted, attempts to contact the participant must be documented in case notes, including the intent of the attempted contact.

Allowable follow-up activities also include:

1. Supportive Services
2. Adult Mentoring
3. Financial Literacy Education
4. Services that provide Labor Market Information
5. Activities that help youth prepare for and transition to postsecondary education and training

Reference: TEN 22-19; 20 CFR § 681.640; TEGL 21-16; WIOA sec. 129(c)(1)(B) and 123; MDRC's [Serving Out-of-School Youth Under the Workforce Innovation and Opportunity Act \(2014\)](#) by Farhana Hossain; 2 CFR part 200.

Related TDLWD Policy: Youth Program Service Design, Common Exit from WIOA Partner Programs

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

Jimmy Williamson, Chair
Northwest Tennessee Workforce Board