

SOUTHEAST TENNESSEE LOCAL WORKFORCE DEVELOPMENT BOARD



2018 – 2020 LOCAL AND REGIONAL PLANS

RESOLUTION
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SOUTHEAST TENNESSEE LOCAL WORKFORCE DEVELOPMENT BOARD

WHEREAS, the Workforce Innovation and Opportunity Act (WIOA) requires the local workforce development board to develop and submit, in partnership with the chief local elected official, comprehensive regional and local plans to the Governor; and

WHEREAS, the regional and local plans shall support and be consistent with the vision, goals, and strategy described in WIOA and the Tennessee Department of Labor and Workforce Development's (TDLWD) Combined State Plan; and

WHEREAS, the Regional and Local Plans seek to address current and future strategies and efficiencies that impact the continuing transformation and evolution of the public workforce system, serving business and industry and individuals with barriers; and

WHEREAS, the Local and Regional Plan documents are published on the local area's website, www.secareercenter.org, for public review; and

WHEREAS, public notice that the Local and Regional Plans are available for review and comments was published in the *Chattanooga Times Free Press* on January 3, 2019, for a 15-day review period; and

WHEREAS, no public comments have been received regarding the final documents.

NOW, THEREFORE, BE IT RESOLVED that the Executive Committee of the Southeast Tennessee Local Workforce Development Board hereby approves and adopts the 2018 – 2020 Local and Regional Plans as documented in the meeting minutes dated January 18, 2019.

BE IT FURTHER RESOLVED that the CLEO authorizes the submittal of the Local and Regional Plans to the Tennessee State Workforce Development Board.



Mayor Jim Coppinger
Hamilton County

1-18-2019
Date

Abstract

The Workforce Innovation and Opportunity Act (WIOA) requires each workforce development board to develop and submit to the state, in partnership with the local chief elected official, comprehensive local and regional plans. The local and regional plans will be effective 2018 – 2020.

The local and regional plans will support the workforce investment and development strategies described in the Tennessee Department of Labor's Combined State Plan in accordance with WIOA Section 102(b)(1)(E), and otherwise be consistent with the State Plan. The Southeast Tennessee Local Workforce Development Board has complied with WIOA Sections 106 through 108 in the preparation and submission of the plan.

The workforce system, education, and economic development professionals must work in concert and be market-responsive to the needs of the employers relative to ever-evolving and in-demand skills of the regional workforce. Coordination between the economic development, which markets the workforce to businesses and the workforce system and education, which either facilitates training and workforce development or provides the training of the workforce, is the best way to ensure the region is getting the training and access required for future jobs. This coordination will also improve and refine the regional economic development strategy and make the region and state more competitive in attracting new business.

The regional and local plans represent the culmination of a deliberate strategy to functionally align all of the WIOA required activities in a coherent and integrated manner that averts duplication and maximizes efficiencies.

EXECUTIVE SUMMARY

The Workforce Innovation and Opportunity Act (WIOA) requires the local workforce development board to develop and submit, in partnership with the chief local elected official, comprehensive regional and local plans to the Governor. The regional and local plans shall support and be consistent with the vision, goals, and strategy described in the Tennessee Department of Labor and Workforce Development's (TDLWD) Combined State Plan.

The local plan, submitted by the Southeast Tennessee Local Workforce Development Board (STLWDB), seeks to address current and future strategies and efficiencies that impact the continuing transformation and evolution of the public workforce system. In the Southeast Tennessee Local Workforce Development Area (STLWDA), 1) the needs of business and workers drive workforce solutions; 2) One-Stop Centers and Affiliate Offices provide superior customer service to all job seekers and businesses; and 3) the workforce system supports strong regional economies that align with state priorities.

STLWDB collaborates with a wide variety of individuals, businesses, and organizations. The board sees its mission as guiding a regionally-recognized workforce development system that aligns with the economic and educational goals of Tennessee which in turn results in a well-qualified workforce that is available to businesses and industries across multiple counties. The board's Mission Statement directly supports economic business growth because workforce development leads to economic development. The Vision Statement identifies a dynamic and thriving region where prepared job seekers are attached to quality careers that align with the needs of business and industry.

The collaborative development of STLWDA's local plan serves as a framework for the local elected officials, economic development, WIOA partners, community-based organizations, labor unions, and WIOA Career Service providers to use as they coordinate services for job training, placement activities and regional businesses in order to meet the needs across each of the 10 counties in the local area.

STLWDA's plan addresses how the board will foster strategic alignment, improve service integration, and ensure that the workforce system is industry-relevant. The board will respond to the economic needs of the local area and match employers with skilled workers. The local plan should lead to greater efficiencies by reducing duplication and maximizing financial and human resources.

Overarching goals for STLWDA include the following:

- Continue to be more data-driven and performance-based
- Develop new partnerships to reflect the economic and workforce geography of the region
- Align business & industry with education and training programs
- Meet industry standards with workforce preparedness as industry innovates
- Encourage lifelong learning for sustainable economic growth
- Highlight transferrable skills to promote the emergence of new jobs and economic diversity

- Attract new businesses and industries by sustaining good jobs in the transportation, warehousing and logistics sectors—the economic footprint of the region.

STLWDA's plan represents the combined results of industry research, ongoing partnership development, asset mapping and process improvement, provided in part through regional collaboration. The local plan is not a static document; it is dynamic and ever-morphing because the local area is market responsive to changing environmental, economic and workforce needs as they emerge.

II. LOCAL PLAN COMPONENTS

OPERATING SYSTEMS AND POLICIES

This chapter provides an overview of all the operating systems. Attachments of policies within the Southeast Tennessee Local Workforce Development Area are located at the end of the document.

A. One-Stop Delivery System Description and Partner Resource Contributions

The Southeast Tennessee Local Workforce Development Area (STLWDA) is comprised of 10 counties: Bledsoe, Bradley, Grundy, Hamilton, Marion, McMinn, Meigs, Polk, Rhea, and Sequatchie. The area has two comprehensive One-Stop centers in Chattanooga and Athens and three Affiliate Centers located in Cleveland, Dayton and Jasper. For towns or municipalities without an AJC, STLWDA provides outreach using the Mobile AJC. The American Job Centers, including the Affiliate Centers, are strategically located in the local area for ease of customer access.

The initial MOU under WIOA established formative service interfaces for the local workforce system. All parties identified in this MOU, as well as any other MOU that establishes a partnership, will work together and meet on a regular basis to continue provide a seamless service delivery system of employment and training services for the regions' job seekers (adults, dislocated workers and youth) and employers. Title I, One-Stop Operator, Vocational Rehabilitation, Adult Education, and Wagner-Peyser are co-located at one or more of the comprehensive AJCs and have Infrastructure Funding Agreement commitments to the board for cost sharing. Partner contributions are either cash or in-kind and depend on relative benefit

Career Services and Other Program Services

Basic Career Services are made available to all individuals seeking services in the AJC and include:

- Determine if eligible to receive assistance from the adult, dislocated worker, or youth programs;
- Outreach, intake, and orientation to information and other services;
- Referrals to and coordination of activities with other programs;
- Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive service needs;
- Labor exchange services, including job search and placement assistance, and information on in-demand industry sectors and occupations;
- Labor market employment statistics information;
- Information on job skills necessary to obtain the vacant jobs listed;
- Information relating to local, in-demand occupations and the earnings, skill requirements, and opportunities for advancement for those jobs;
- Performance information and program cost information on eligible providers of training services by program and type of providers;
- Information relating to the availability of supportive services and appropriate referrals to those services including child care and child support;

- Medical or child health assistance available through the state’s Medicaid program and Children’s Health Insurance Program;
- Benefits under the Supplemental Nutrition Assistance Program (SNAP);
- Temporary Assistance for Needy Families (TANF), and other supportive services and transportation provided through that program;
- Determine eligibility for programs of financial aid assistance for training and education programs not provided under WIOA; and,
- Information and assistance regarding filing claims under Unemployment Insurance programs, including meaningful assistance to individuals seeking assistance in filing a claim.

If AJC staff determine that individualized career services are appropriate for an individual to obtain or retain employment, these services must be made available to the individual at the AJC. Center staff may use recent previous assessments by partner programs to determine if individualized career services would be appropriate. These services include:

- Comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers which may include diagnostic testing and use of other assessment tools;
- In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;
- Development of an Individual Employment Plan to identify the employment goals, appropriate achievement objectives and appropriate combination of services for the participant to achieve his or her employment goals including the list of and information about eligible training providers;
- Group or individual counseling and mentoring;
- Career planning;
- Short-term pre-vocational services including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment or training;
- Internships and work experiences that are linked to careers;
- Workforce preparation activities that help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education, or training, or employment;
- Financial literacy services;
- Out-of-area job search assistance and relocation assistance; and,
- English language acquisition and integrated education and training programs.

Career Services and Locations

The local One-Stop system can be accessed through the area’s two comprehensive centers (AJC) and three affiliate centers (ajc) conveniently located in five of the ten counties in the Southeast Tennessee Local Workforce development areas.

American Job Center locations can be found at the following addresses:

Chattanooga AJC—Comprehensive
Eastgate Town Center
5600 Brainerd Road, Suite A-5
Chattanooga, TN 37411

Dayton ajc—Affiliate
Regional Skills Center
200 4th Avenue
Dayton, TN 37231

Athens AJC—Comprehensive
410 N. Congress Pkwy
Athens, TN 37303

Jasper ajc—Affiliate
5510 US-41
Jasper, TN 37347

Cleveland ajc—Affiliate
Cleveland State Community College
3535 Adkisson Drive
Technology Building Room 130A
Cleveland, TN 37312

Mobile AJC
Self-Book at:
www.tn.gov/workforce/jobs-and-education/job-search1/mobile-american-job-centers/mobile-american-job-centers-redirect1/book-the-bus.html

AJCs maintain publicly accessible resource rooms including access for persons with disabilities. The resources available include computers with internet access, tutorials for career exploration, job searching and resume writing, job postings, periodicals, information on unemployment insurance eligibility, services and financial aid for local non-WIOA training, labor market reports, and information on education programs and partner programs. The resource areas are staffed with knowledgeable staff and partner employees to assist with customer questions.

On-Demand Access to Required Career Services

STLWDA's One-Stop System sites are located strategically throughout the region so that individuals and employers may access the physical location during business hours. The centers are customer-centered, and the resource rooms are also easily accessed. The AJCs are also accessible to individuals with disabilities; the resource rooms have accessible computer technology for self-service or with staff assistance. The Mobile AJC has the same services and resources as the brick and mortar locations.

One-Stop Operator and Coordinated Service Delivery

The One-Stop Operator (OSO) is competitively procured. The Board procures property, goods and services through its Fiscal Agent, SETD, and adheres to its Purchasing and Property Management Policy with specific instructions for procurement for WIOA-related acquisitions of property and services. SETD also complies with the TDLWD Purchasing and Procurement Policy.

Function and Scope of the One-Stop Operator

The One-Stop Operator services are contracted with Mid Cumberland Human Resources Agency. The OSO is required to coordinate the leadership of all partners through functional management of the AJCs. The methods of coordinated service delivery between the operator and partners are determined by the OSO.

Mid-Cumberland Human Resource Agency (MCHRA) is the administering entity for the One Stop Operator (OSO) function in the local area. This position involves functional supervisory

work of the American Job Centers, established through the Workforce Innovation and Opportunity Act (WIOA). The One-Stop Operator function provides functional supervision to American Job Center partner program staff and convenes the Welcome Team, the Career Service Team and the Business Service Team. The OSO function will split time in Comprehensive and Affiliate American Job Centers evenly, with 50% of time being spent in Comprehensive Sites, and spending the remaining 50% of time being spent in affiliate sites. Detailed job responsibilities are included in the MOU.

Coordinated Referrals: Operator’s Role and Responsibilities

The OSO will work with all partners to ensure the coordinated referrals among and between partners and businesses where applicable. The OSO provides “functional” direction/supervision of AJC partner staff located in the centers and, as such, can provide the leadership in guiding partner referrals within and outside of the centers. The OSO will be responsible for the coordination of partners, both on-site and off-site, for the AJCs, including, but not limited to the following activities: maintaining and updating a digital and hard copy listing of all partner programs to assure that all staff in the AJC have up-to-date information for referral of customers. At the AJCs, once registered and counseled by welcome staff, referrals (warm handoffs) will be made to partners as agreed upon by the Site Leads. Off-site referrals are made by phone, electronically, or via paper utilizing the AJC Partnership Network Referral Form. All referrals are captured and tracked in VOS or other state MIS when appropriate

B. Local Referral Process

As soon as participants are registered and counseled by welcome staff, referrals (warm handoffs) will be made to partners as agreed upon by the OSO and Site Leads. Off-site referrals are made by phone, electronically, or via paper utilizing the agency’s intake form. In addition to having an interagency referral form, all referrals are captured and tracked in VOS. Both the interagency referral form and VOS identify the entity making the referral and the entity receiving the referral. In short, referrals may occur between any partner agency listed in the MOU, area schools and community service organizations.

Partner referrals are made by telephone and electronic communication among and between each agency as appropriate.

- Title I (Adult, Dislocated Worker and Youth)
- Title II (Adult Education and Family Literacy)
- Title III (Employment Services under Wagner-Peyser)
- Title IV (Rehabilitation Services)
- Perkins/Post-Secondary Career and Technical Education
- Unemployment Insurance
- Job Counseling, Training and Placement Services for Veterans
- Trade Readjustment Assistance
- Trade Adjustment Assistance
- Migrant & Seasonal Farmworkers
- Community Service Block Grant

The factor that determines the agency to which the participant is referred is based on a needs assessment and customer choice. Any staff member from any entity may make a referral to

another entity by using the Interagency Referral Form and scanning into VOS. Confidentiality is expected, and no information is released without expressed written permission.

WIOA's workforce system is publicly-funded and requires all services and physical locations to be readily accessible to individuals with barriers including individuals with disabilities. The Department of Vocational Rehabilitation has inspected each comprehensive AJC and certifies that the facility is accessible to individuals with disabilities. The AJCs in our local area met accessibility requirements.

C. Adult and Dislocated Worker Employment and Training Activities

Adult and dislocated worker services may include many of the Career Services previously noted. In order to provide employers and workers with optimum opportunity for selection of services, all employment and training activities allowable under WIOA as well as those provided by all partner agencies will be made available in the local area.

The Southeast Tennessee Local Workforce Development Board elected to serve justice-involved individuals as the new partner element. Cooperative agreements will be implemented to support the programs in the local area. The local board has approved specific sectors for which training and other services are focused and include transportation and logistics, healthcare, advanced manufacturing, and STEM (engineering, information technology, etc.).

Adult and dislocated worker services may include many of the Career Services previously noted and include Basic Career Services, Individualized Career Services, and Training Services may be offered to Adults and Dislocated Workers as appropriate. Assessments and career exploration are offered by AJC staff. Career search is done primarily online either in the Resource Room or at another desktop location. The provision of these services meets or exceeds WIOA requirement.

With or without a WARN, the local Rapid Response (RR) Coordinator communicates the status of the layoff or closure, plans for a scheduled event(s) for RR services and other details as necessary to TDLWD. The RR Coordinator and team meet with the employers to plan the RR event. At the mass meeting, the RR team provides affected employees with packets containing details regarding all the services that are available to them. A PowerPoint presentation that covers the packet information is also provided. STLWDA's RR team is a successful model for services.

D. Process for Providing Youth Activities

The Youth Committee is one of the standing committees in the local area and is tasked with identifying ways to provide youth-related workforce development activities to eligible youth. The local board provides oversight of the committee and governs local programs procured with the local Career Services contract.

The WIOA Youth program is designed to help eligible youth meet career and educational goals through our year-round program that provides:

- An individualized service strategy for each participant that identifies educational and employment goals and objectives with services and support for positive outcomes

- Opportunities to improve educational and skill competencies, employability, and life skills
- Postsecondary educational and training opportunities that lead to the attainment of career readiness and credentials for in-demand occupations
- Effective connections to employers that provide career exploration, job shadowing, work-based learning, work experience, and youth employment opportunities
- Opportunities related to leadership development such as teamwork, decision-making, community service, and civic and social responsibility
- Financial literacy education and development of entrepreneurial skills

There are 14 required program elements that are available through local programs:

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.
2. Alternative secondary school services, or dropout recovery services
3. Paid and unpaid work experience that have as a component academic and occupational education that may include: Summer employment and other employment opportunities available year-round - Pre-apprenticeship programs - Internships and job shadowing - On-the-job training opportunities
4. Occupational skill training (with priority for training programs that lead to postsecondary credentials aligned with in-demand industry sectors).
5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster
6. Leadership development opportunities that may include community service and peer centered activities encouraging responsibility and other positive civic and social behaviors
7. Supportive services
8. Adult mentoring for a total of not less than 12 months
9. Follow-up services for not less than 12 months
10. Comprehensive guidance and counseling
11. Financial literacy education
12. Entrepreneurial skills training
13. Services that provide labor market and employment information about in-demand industry sectors (local area) , career awareness, career counseling, and career exploration services
14. Activities that help youth prepare for and transition to postsecondary education and training

The Youth Eligibility Policy provides direction to ensure that every WIOA participant who receives WIOA Youth Program funded services is eligible to receive those services. The policy describes WIOA-mandated youth eligibility requirements, identifies the criteria for the 5% limitation and 5% exception, identifies the criteria for determining if additional assistance is needed for a participant to complete an educational program or to secure or hold employment. Additionally, this policy addresses documentation requirements.

The State's request to waive the requirement that local areas expend seventy-five percent (75%) of local formula youth funds on Out-of-School Youth was approved for program years 2019 and 2020, lowering the minimum expenditure rate to fifty percent (50%). The local area adopted the

waiver to provide increased opportunities to serve In-School Youth, especially those in need of work-based learning.

The local area places emphasis on Work Experience (WEX) for Youth participants to meet or exceed the WIOA twenty percent (20%) expenditure requirement. Work Experience is designed to enable youth to gain exposure to the working world and its requirements. WEX should help youth acquire the personal attributes, knowledge, and skills needed to obtain a job and advance in employment. Paid and unpaid work experiences for Youth participants must include academic and occupational education as a component. WEX may be provided in the private for-profit, non-profit, or public sectors and may include the following types:

- Summer employment opportunities, and other employment opportunities available throughout the school year;
- Pre-apprenticeship programs;
- Internships and job shadowing; and
- On-the-job training opportunities

WEX must provide a planned and structured academic and occupational learning experience that will contribute to the achievement of the participant's employment goals. Academic and occupational education may be provided on a concurrent or sequential basis based upon the participant's Individual Service Strategy (ISS), and may occur inside or outside the work site. WEX should also focus on assisting individuals to establish a work history, demonstrate success in the workplace, and/or develop the skills that lead to entry into and retention in unsubsidized employment.

The local area's youth program co-enrolls with Vocational Rehabilitation for work readiness and work experience when appropriate. In previous program years, the local area Youth program provided work readiness and work experience opportunities to this target population.

E. Services to Priority Populations

WIOA mandates serving individuals with barriers to employment, defined in WIOA section 3(24), and seeks to ensure access to employment and training services for these populations on a priority basis. 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. There are no restrictions to providing basic career services; they may be provided to any eligible adult.

Priority populations include the following:

- Displaced homemakers (as defined in WIOA Sec. 3(16);
- Low-income individuals (as defined in WIOA Sec. 3(36);
- Indians, Alaska Natives, and Native Hawaiians (as defined in WIOA Sec. 166(b);
- Individuals with disabilities, including youth who are individuals with disabilities (as defined in WIOA Sec. 3(25) (includes individuals who are in receipt of Social Security Disability Insurance);
- Older Individuals (age 55 and older) (as defined in WIOA Sec. 3(39);
- Ex-offenders ("offender" as defined in WIOA Sec. 3(38);

- Homeless individuals or homeless children and youth
- Youth who are in or have aged out of the foster system
- Individuals who are:
 - English language learners (WIOA Sec. 203(7))
 - Individuals who have low levels of literacy (an individual is unable to compute or solve programs, or read, write, or speak English at a level necessary to function on the job, or in the individual’s family, or in society); and
 - Individuals facing substantial cultural barriers;
- Eligible migrant and seasonal farmworkers (as defined in WIOA sec. 167(i)(1-3));
- Individuals within two years of exhausting lifetime TANF eligibility;
- Single parents (including single pregnant women);
- Long-term unemployed individuals (unemployed for 27 or more consecutive weeks); and

Veterans and Eligible Spouses Priority of Service

The priority of service for veterans and eligible spouses applies across all qualified employment and training programs. A veteran must meet each program’s eligibility criteria to receive services under the respective employment and training program. For income-based eligibility determinations and for determining priority of service, military pay or allowances paid while on active duty or paid by the Department of Veterans Affairs (VA) for vocational rehabilitation, disability payments, or related VA-funded programs are not to be considered as income, in accordance with 38 U.S.C. 4213 and 20 CFR 683.230.

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

- **1st Priority** – Covered persons (Veterans and eligible spouses) who are:
 - Low income [as defined by WIOA Sec. 3(36)], or
 - Recipients of public assistance, or
 - Who are basic skills deficient
- **2nd Priority** – Individuals (non-covered persons) who are:
 - Low income [as defined by WIOA Sec. 3(36)], or
 - Recipients of public assistance, or
 - Who are basic skills deficient
- **3rd Priority** - Covered persons (Veterans and eligible spouses) who are:
 - Not low income, and
 - Not recipients of public assistance, and
 - Not basic skills deficient
- **4th Priority** – Individuals (non-covered persons) who do not meet the above priorities as defined in the board’s Adult Priority of Service Policy.

AJC staff utilize the Low-Income Eligibility Worksheet to determine low income eligibility. Staff obtains additional information concerning individuals who qualify as low-income, and the criteria for that determination from the *Workforce Services Guidance – Income Guidelines for Persons Defined as Low-income Individuals*.

WIOA Section 3(5)(8) defines basic skills deficient as "an individual who is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society." Basic skills deficiencies are determined by an objective, valid, and reliable assessment such as the Test of Adult Basic Education (TABE) or Comprehensive Adult Student Assessment Systems (CASAS). If the priority of service will also be based on basic skills deficient criteria, then the participant's file must contain academic tests (including the participant's name, date of test, and results). As stated in TEGL 19-16, Individuals who are English language learners meet the criteria for "basic skills deficient" and must be included in the priority populations for the title I Adult program.

When participants are basic skills deficient as determined by an assessment or assessments, the staff will refer the participant for learning support in order to achieve the appropriate level basic skills for postsecondary training. Training services for priority populations are used to connect participants to in-demand occupations that need to be filled by employers in STLWDA. Currently, the local area has a high demand for workers, but the supply is limited. Service to priority populations has never been more important for our local area.

Self-Sufficiency is another criterion to identify priority populations. Career Service staff utilize the Self-Sufficiency Eligibility Worksheet to calculate the individual's earnings during the last six-month period. The worksheet determines eligibility for the individual.

Recipient of Public Assistance includes individuals who receive, or in the past six months have received or are a member of a family that is receiving or in the past six months has received, assistance through one or more of the following: SNAP, TANF, SSI, or state or local income-based public assistance.

For those receiving public assistance such as SNAP E&T, these participants have met the priority to all programs offered under WIOA youth and adult/dislocated workers. SNAP E&T participants, as an example, can take full advantage of this opportunity, since these services are delivered within the AJC. AJC partners will refer a majority of participants to WIOA for training programs. Our partnership with TCATs and community colleges will allow us to select several short-term training programs to quickly train participants interested in attending school. WIOA can then move them to On-the-Job (OJT) opportunities that would not be available to participants outside of our partnership.

STLWDB has an Adult Priority of Services Policy that dictates the process of identifying, enrolling, and delivering services to these target priority populations.

F. Training Services through the use of Individual Training Accounts

An Individual Training Account (ITA) is the mechanism by which payment for training service is made. An ITA may be utilized for programs approved on the state's Eligible Training Provider List (ETPL). For WIOA eligible participants, grants may be awarded up to \$5,000 for a certificate, industry-recognized credential, or license and up to \$8,000 for a two-year degree associate degree program or a four-year university/college bachelor's degree. WIOA also allows ITAs for apprenticeship programs listed on the ETPL. The local area plans to increase apprenticeship opportunities as an evidence-based job training component.

Training contracts may only be used if at least one of the five circumstances listed below applies and the process for their use is described in the Local Plan. Additionally, the Local WDB must have fulfilled the consumer choice requirements of 20 CFR 680.340. Under section 134(c)(3)(G)(ii) of WIOA and consistent with 20 CFR 680.320, 680.340, and 680.530, states may use the contract exceptions as described below:

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

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

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

ITA Policy

The ITA policy is an attachment to the local plan.

G. Informed Customer Choice in the Selection of Training Programs

Information on local training providers is made available to customers via Jobs4TN.gov under Special Services by clicking on the Education and Training Data link. The selection of training services should be conducted in a manner that maximizes customer choice, linked to in-demand occupations, informed by the performance of the training providers, and is coordinated to the extent possible with other sources of assistance, including PELL grants, etc. (see WIOA sec. 134(c)(3)).

H. Continuous Improvement of Eligible Training Providers

One method that the local board utilizes in order to ensure the quality of Eligible Training Providers is through the application process itself. The LWDB or the State may deny eligibility if the application from an ETP is not complete or not submitted within required time frame.

- The STLWDB may deny eligibility if the application from a training provider is not complete or not submitted within the required time frame.
- The STLWDB may deny eligibility if an applicant fails to meet the minimum criteria for initial listing specified in this policy.

- The STLWDB may deny eligibility if the training programs offered by the training provider do not lead to gainful employment for in-demand occupations as determined by a labor market analysis.
- The STLWDB may deny eligibility if the training program demographics (i.e. costs and length) are substantially higher (beyond 50%) than previously approved programs offering the same credential (within the past two program years).
- The STLWDB or the State may deny eligibility if it is determined that the applicant intentionally supplied inaccurate information (WIOA Section 122(f)(1)(B)).
- The STLWDB 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)).

All programs approved for initial eligibility by the STLWDB must be reviewed within one year. Continued eligibility requires reviews every two years after. The State may remove a program or ETP at the request of the board for any of the following reasons:

- a. Unethical/illegal billing practices
- b. Violations of Title VI of the Civil Rights Act of 1964; Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973; or the Act Discrimination Act 1975.
- c. Lack of qualified training personnel or building infrastructure

Additional measures used to foster quality control for ETPs includes the quarterly report. ETPs must adhere to quarterly report requirements to TDLWD:

- ETPs must provide the information necessary to determine program performance and to meet other requirements of the WIOA. The ETP must agree to make available verifiable data to validate any information submitted (WIOA Section 122[d][1]).
- ETPs on the ETPL are required to submit quarterly performance reports to the State. The report must contain individual-level data for all participants in programs offered by the ETP that have serviced at least one (1) student with the assistance of WIOA funding.
- The ETP reports are due to the State on the specified due dates.
 - Quarterly report due dates: January 15th, April 15th, July 15th and October 15th of every year. (In the event that the due date falls on a State holiday or a weekend reports are due by the conclusion of the next business day.)

The ETPs must report out on the following: Program Completion Rate, Credential Attainment Rate, Employment Rate During the 2nd Quarter After Exit, Employment Rate During 4th Quarter After Exit, and Median Earnings During 2nd Quarter After Exit.

Quality assurance and continuous improvement are built-in mechanisms for the local board to directly ensure that ETPs meet the employment needs of local employers, workers, and job seekers.

STLWDA uses TDLWD's policy and guidance for the approval of local training providers.

I. Coordination of Transportation and other Supportive Services

STLWDB coordinates the Supportive Services through its Supportive Services Policy. Career Services staff are trained on the appropriate use, limitations, conditions or restrictions of supportive services. The board has authorized that supportive services may be provided to Adult and Dislocated Workers in WIOA individualized career and training services. Youth supportive services may also be provided and should enable an individual to participate in WIOA activities.

AJC Title I staff should ensure that supportive services only be provided when the services are not available elsewhere, since WIOA is considered funding of last resort. First, the participant's need for the service must be determined in the initial and ongoing assessment and must be documented in the case file; participants enrolled in Individualized Career or Training Services must demonstrate need in the Individual Employment Plan (IEP) or Individual Service Strategy (ISS). The cost of supportive services must be reasonable and competitive in process. When multiple options are available for receiving supportive services, documentation must show a reasonable effort was made to determine and choose the lowest, most competitive price available. The cost of Supportive Services must be necessary to participate and an allowable cost under Federal guidelines. The services may not be provided prior to an individual's registration date in VOS. The need for Supportive Services is always determined on individual basis, in coordination with PELL and other federal and local funds, including core partner programs, and the availability of local formula funds. Supportive Services are meant to be short-term measures and may be limited both in duration and amount and may only be provided to active Adult and Dislocated Worker participants prior to exiting from the program; however, follow-up services for Youth may include supportive services. Lastly, requested service reimbursement must be approved prior to occurring the expense.

The list of supportive services can be found in the local area's Supportive Services Policy and includes, in part, child care assistance, transportation, needs-related payments, and training-related expenses such as uniforms, tools, etc. The board stipulates the funding limits, duration, priority of service, and documentation requirements for supportive services and also lists unallowable expenses in the policy.

As attachments to the Supportive Services Policy, the local board provides detailed Child Care Assistance and Transportation Assistance Guidelines. The guidelines include instructions to staff as well as eligible participants receiving the supportive services. The guidelines define the service, define the recipient of the service, provide expectations of the participants, and specify restrictions of services. The form also requires the participant's signature signifying that he or she understands the consequences of failing to abide by the Guidelines.

Local Supportive Services Policy

The local Supportive Services Policy is an attachment to the local plan.

VISION, GOALS, AND IMPLEMENTATION STRATEGIES

This section outlines how the local board will coordinate the local workforce, education and economic development activities with local activities that are carried out in the area. The

responses illustrate that business, education and workforce development stakeholders have provided input and are in agreement with the plan.

A. Provide a description of how the local board, working with the entities carrying out core programs, will expand access to employment, training, education, and supportive services for eligible individuals, particularly individuals with barriers to employment. Include how the local board will facilitate the development of career pathways and co-enrollment, as appropriate, in core programs, and how it will improve access to activities leading to recognized postsecondary credential, academic or industry recognized.

All customers are given access to high-quality American Job Center and affiliate sites that connect them with the full range of services available in their communities. American Job Center (AJC) staff work with clients to overcome any barriers to employment and obtain self-sufficiency. Additionally, Adult Education provides skill upgrades to individuals who are basic skills deficient and ensure access to training and career pathways.

The STLWDB's Mission: *To drive innovative and transformational change in the development of the region's talent through focused delivery of quality services with integrity and flexibility. We collaborate with business, industry, economic development and education to prepare and provide skilled workers and improve the standard of living in our communities.*

The STLWDB's Vision: *We are a dynamic and thriving region where prepared job seekers and quality career opportunities align with the needs and demands of business and industry.*

By ensuring that educators (TCAT, community college and University) sit on the local board and are involved with board committees, the local area will enhance the services to the customers at the One-Stop System. Each partner has a specialty and by working together on projects and events all customers can receive the same level of expertise and the chance of duplicated services will be lessened.

Expanding access to employment is ongoing in the local area. The Career Services staff, Business Services Team, and multiple regional partners facilitate five major job fairs which serve as large scale interviewing and hiring events. In some locations, staff provide job readiness trainings which include resume' preparation, mock interviews, how to "dress for success," etc. During the program year, over 400 employers and nearly 2,000 job seekers attend the area's job fairs. These annual events have been very successful and are planned annually in the local area.

In order to develop career pathways for persons with disabilities in a demand-driven system requires strong partnerships with the local office of the Department of Vocational Rehabilitation and area organizations who serve persons with disabilities. Other target populations in the region include justice-involved individuals. Partnerships with the Tennessee Department of Corrections and community-based organizations including the Second Chance partner are key to successful reintegrating these individuals into the workforce.

Working with businesses who have a history of working with persons with disabilities or justice-involved individuals will assist partners to define the specific, essential and occupational skills needed to meet their workforce needs. Alignment and integration of partner services and resources will enhance new and existing career pathway opportunities for our students, job seekers and workers, including those facing multiple barriers to employment.

Other individuals with significant barriers to employment include (1) TANF recipients, (2) Welfare-to-Work participants, (3) public assistance recipients; and, (4) low-income individuals served under the priority system. These customers are less likely to have completed high school than the population at large.

Frequently, individuals in this group have skill development needs that cross all three areas: (1) basic skills; (2) employability skills; and, (3) occupational and employment skills. A lack of basic skills is often the most significant barrier to employment.

There is also a great need to improve the employability skills of this customer group. Employability skills include the following (1) communication skills; (2) development of strong work ethic; (3) teamwork skills; (4) the ability to grasp both the content and the application of training; (5) problem-solving skills; and (6) life coping skills.

The STLWDB has appointed the Opportunities Committee, a standing committee dedicated to finding creative workforce development solutions for target populations with barriers to career pathways. The committee will initiate a career planning strategy that will serve as the linkage connecting career pathways with in-demand industries and occupations and providing access to activities leading to a recognized post-secondary credential including a credential that is an industry-recognized certificate or certification, portable, and stackable.

The local area is committed to the development of career pathways leading to a recognized postsecondary credential, academic or industry-recognized. A high school in the Hamilton County School District has recently installed a Registered Apprenticeship (RA) Program in conjunction with an industry partner that is a top tier automobile production supplier. The Gestamp work-based learning program through Hamilton County Schools is the first high school program in Tennessee to earn the U.S. Department of Labor Office of Apprenticeship's registered apprenticeship designation. Gestamp is now a registered apprenticeship in advanced manufacturing. The Gestamp program allows high school students to get a full-day work-based learning experience while also completing their education. Students take online academic classes in a computer lab at Gestamp and get actual work experience during the school day in the Gestamp plant. The RA program will allow students to seamlessly earn high school and postsecondary credit and also provide on-the-job learning (training) for needed occupations. This is an earn and learn model and more details can be found at this link:

https://www.hcde.org/newsroom/gestamp_program_earns_u_s_labor_designation

When one program's services alone are not adequate to meet all of the customers' needs, it is important for the WIOA process to consider and employ other partners' programs and services. Specifically, customers may be eligible for more than one program. In each case, the determination for co-enrollment is made at the time the customer's needs are identified. Staff work together across programs as well as amongst partners to determine what services best meet

the needs of the customer. For example, a TAA customer in need of an assessment as well as supportive services may be co-enrolled across partners and programs as her/his needs are determined. Additionally, a youth enrolled in the in-school program may benefit from an OJT opportunity. If so, then the youth would be co-enrolled in the Adult program once eligibility is determined.

B. Training Programs to Meet the Need of Area Employers

The local board has developed policies and procedures in order to expand or enhance local Incumbent Worker (IWT), On-the-Job (OJT), and Transitional Jobs Training Programs. The board and Career Services staff promote career pathways and sector strategies that are focused on training and career pathways in STEM, transportation and logistics, healthcare, and advanced manufacturing.

The Business Services Team and board staff partner with postsecondary training providers, local area Chambers of Commerce, Economic and Community Development, and other stakeholders as appropriate to work jointly to reach out to businesses and industry to provide opportunities for WIOA training grants for high quality training program that result in a more competitive and skilled workforce in the local area. The partnerships' outreach efforts have resulted in an increased number of participating employers to create solutions for improving the skill levels of the workforce in the region.

C. Coordination of Education and Workforce Development Activities,

The local board will work with the One-Stop Operator (OS) to ensure core programs, Title I, II, III and IV, are referring customers as appropriate to education and workforce development activities. The OSO will also ensure that Career Services staff are giving priority to those who are low income, basic skills deficient, and Veterans.

D. Support for Strategies Identified in the State Plan

The MOU identifies ways that the core programs align with the strategic goals of the local board relating to services rendered in and outside of the AJCs which lead to and involve workforce development including postsecondary Career and Technical Education. The pathways approach fosters the development of local, long-term, and robust workforce pipelines for in-demand sectors in the local area.

The OSO will ensure that the core programs as well as other required and non-required partners are aligned with the local board's sector-driven training pathways that result in credentials that lead to in-demand occupations and meet the regional employers' workforce needs. The coordinated career pathways training is essential for sustainable economic and workforce development.

The division of Career and Technical Education at the Department of Education oversees work-based learning (WBL) in Tennessee. The local board recognizes the value of WBL and access to early postsecondary opportunities such as dual enrollment and dual credit.

Local areas must select at least one from the following new plan elements to address and provide a written response.

- a. Public Assistance Recipient to Self Sufficiency Element**
- b. Workforce and Correction Partnership**
- c. Competitive Integrated Employment Partnership**

The local board, stakeholders, and partners have elected to support strategies that reconnect justice-involved individuals to the regional workforce, minimize or eliminate recidivism, and eventually lead to self-sufficiency.

The Grundy County Sheriff's Department was recently awarded a grant to replicate the Correctional Career Pathways (CCP) program launched originally in April of 2015 by the Greene County Sheriff's Department, the first of its kind in the state. Mirroring Greene County's project, the Grundy County Sheriff's Department's project offers classes, job placement, counseling (mental health and substance abuse) and transportation to qualified inmates. After instruction in life skills and special training, trustee inmates go to work at a local manufacturing plant. A minimum of \$100 of inmate wages are garnished and returned to the county general fund to pay court-ordered costs, fines, restitution and in some cases, child support. Remaining wages belong to inmates and are used as needed. Wages earned stimulate growth in the local economy (i.e. food for families, school supplies, medical costs, clothing, housing, transportation, childcare, etc.).

Efforts to replicate the Grundy County project in other Southeast counties are underway. The overarching goal is to establish a consortium of partners dedicated to serving justice-involved individuals. Ideally, the local board would also be open to additional federal funds from the U.S. Department of Labor, Employment and Training Administration. A large scale CCP initiative would likely require some start-up funds in order to address the large population impacted by incarceration.

PERFORMANCE GOALS AND EVALUATION

This section includes information on the actions the local board will take toward becoming or remaining a high performing board, consistent with the factors developed by the State Board.

High performance is a priority for the local board, partners, and stakeholders. The local area has long-standing partnerships with Chambers of Commerce, Economic and Community Development, educational institutions, and others who are part of the economic and workforce development network. High standards are expected of this local area and board, and Southeast Tennessee historically has performed exceptionally.

The Board's strategic goals will support the state's strategies for high performance achievement and service alignment with these six indicators: 1) Support a demand-driven system with high employer engagement that will increase employment and earnings outcomes through system, program, and service responsiveness to employer needs and will increase effectiveness in serving employers; 2) Strengthen the One-Stop delivery system and increase integrated service delivery in order to increase employment, earnings, credentials, and skill attainment outcomes for all program partners; 3) Improve and expand services for individuals with barriers to employment to increase employment, earnings, credentials, and skill attainment outcomes for targeted individuals with barriers; 4) Continue the commitment to Youth participation in the 21st

Century Economy to emphasize career pathway partnerships, work-based learning (including apprenticeships) and to increase employment, earnings, credentials, and skill attainment outcomes for youth; 5) Leverage demand-driven management and control tools to achieve strong performance with a high return on investment through continuous improvement; increase accountability for system and service provider outcomes in all WIOA performance measures; and 6) Continue to be a high-performing board with strong workforce system leadership” to support high performance outcomes in all WIOA Performance Indicators through policy, funding, and oversight.

A. PROJECTED LOCAL SERVICE LEVELS

The STLWDA projects service levels to increase slightly over PY2017.

Projected AJC Traffic Counts by Location

Office	PY2017 Actual Visits	PY2018 Projected	PY2019 Projected
American Job Center - Chattanooga	<u>28,572</u>	32,850	36,150
American Job Center - Jasper	<u>4,423</u>	5,075	5,585
American Job Center - Dayton	<u>5,967</u>	6,850	7,535
American Job Center - Athens	<u>8,343</u>	9,600	10,560
American Job Center - Cleveland	<u>4,261</u>	4,875	5,365
Total	<u>51,566</u>	59,250	65,195

Projected WIOA Title I Enrollments

Adult, Dislocated Worker and Youth PY18 Projected Service Levels	STLWDA	Athens	Cleveland	Chattanooga	Dayton	Jasper
New Enrollments						
<u>Adult</u>	<u>385</u>	<u>75</u>	<u>50</u>	<u>150</u>	<u>55</u>	<u>55</u>
<u>Dislocated Worker</u>	<u>205</u>	<u>30</u>	<u>15</u>	<u>65</u>	<u>55</u>	<u>40</u>
<u>Youth</u>	<u>270</u>	<u>50</u>	<u>45</u>	<u>65</u>	<u>60</u>	<u>50</u>
Total Enrollments						
<u>Adult</u>	<u>675</u>	<u>115</u>	<u>75</u>	<u>315</u>	<u>85</u>	<u>85</u>
<u>Dislocated Worker</u>	<u>305</u>	<u>35</u>	<u>30</u>	<u>95</u>	<u>80</u>	<u>65</u>
<u>Youth</u>	<u>430</u>	<u>75</u>	<u>65</u>	<u>105</u>	<u>85</u>	<u>100</u>
<u>In-School Youth</u>	<u>100</u>	<u>15</u>	<u>20</u>	<u>35</u>	<u>10</u>	<u>15</u>
<u>Out-of-School Youth</u>	<u>330</u>	<u>60</u>	<u>45</u>	<u>70</u>	<u>70</u>	<u>85</u>

Under WIOA, performance for all customers and state partners are measured under a set of common indicators of performance (known as Common Measures):

- Entered employment
- Employment retention
- Median earnings
- Credential attainment
- Measurable skill gains
- Effectiveness in serving Employer

STLWDA Negotiated Performance Targets for PYs 2018 and 2019

WIOA PERFORMANCE MEASURES	ADULT		DISLOCATED WORKER		YOUTH	
	PY18	PY19	PY18	PY19	PY18	PY19
Employment Rate 2 nd Quarter after exit (or Place in Post-Secondary for Youth)	83.0%	83.5%	81.0%	82.0%	79.0%	79.5%
Employment Rate 4 th Quarter after exit (or Place in Post-Secondary for Youth)	83.0%	83.5%	81.0%	82.0%	75.0%	76.0%
Median Earnings 2 nd Quarter after exit	\$6,633	\$6,650	\$6,900	\$7,000	NA	NA
Credential Attainment within 4 Quarters after exit	58.0%	59.0%	68.5%	69.0%	70.0%	72.0%
Effectiveness in Serving Employers	NA	NA	NA	NA	NA	NA

Performance of the Local Fiscal Agent

The SETD is subject to an annual financial audit, most recently being completed for year ending June 30, 2018. The SETD was classified as low risk with no financial statement audit findings and no federal award findings or questioned costs. Additionally, the prior year end financial audit resulted in no findings or questioned costs. The SETD Board of Directors reviews and approves the annual audit report. This information is made available to the STLWDB for monitoring and oversight of the performance and effectiveness of the fiscal agent.

TECHNICAL REQUIREMENTS AND ASSURANCES

This section includes the technical requirements and assurances that are required by the Workforce Innovation and Opportunity Act.

A. Information Regarding the Use of Technology in the One-Stop Delivery System

In order to provide an integrated, technology-enabled intake and case management information system for programs carried out under WIOA, TDLWD launched VOS through the virtual one-stop (VOS) platform available at www.Jobs4TN.gov. The VOS dramatically changed the way information is collected and shared across programs. The system fully integrates the core programs with the exception of Vocational Rehabilitation (VR).

The common intake process and reporting facilitates electronic referrals, reporting and coordinated services and tracking of co-enrolled participants in participating programs. Regularly scheduled communication is required for programs co-enrolled with VR to properly case manage and ensure services are not duplicated.

STLWDA encourages both job seekers and business to utilize this system and tools. More and more customers use technology and Jobs4TN enables the local area to be well positioned to identify, respond and enhance the customer's experience using technology. Local area customers have benefited immensely from these connections.

Access to Services Provided Through the One-Stop Delivery System, Including in Remote Areas, Through the Use of Technology and Other Means

Most of the nine local workforce development areas in Tennessee have remote, rural areas that do not have adequate broadband connection in order to access services provided through the One-Stop Delivery System. There are efforts underway that may change the current broadband landscape for the rural counties, but until internet access is available for everyone in STLWDA, the local board will be relegated to use existing resources for remote access to services.

The primary resource is the Mobile AJC which can be scheduled to serve the rural counties that have little or no internet access. The Mobile AJC has computers with internet access, Microsoft Office, and copy and fax machines available to job seekers. The Mobile AJC also serves as a full-service, on-site Rapid Response unit. The coach provides easy access to employment services such as education and training for job seekers, recruitment and human resource assistance for businesses, and information for local and regional economic and community development staff. The Mobile AJC provides similar services that the brick and mortar AJCs provide. They can serve as a venue for workshops for resume' assistance and interview skills. For customers with dependable transportation, the Affiliate AJCs provide many of the services that the comprehensive AJCs provide. The three Affiliate offices, located in Dayton, Jasper and Cleveland, are geographically located in strategic, accessible locations within the 10-county local area and provide a wide-array of services.

B. Physical Accessibility

The local area has taken appropriate action to be in compliance with WIOA Sec. 188, Nondiscrimination. The Tennessee Department of Human Services Vocational Rehabilitation (VR) Program implemented a confirmation process to ensure the physical accessibility for individuals with disabilities for all local areas. All AJCs in the local area are certified compliant by the Vocational Rehabilitation Division of the TDHS.

The One-Stop Operator and WIOA partners ensure programmatic accessibility and compliance with WIOA Sec. 188 and the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq). All partners that receive federal funds are expected to comply with Sec. 188 and the Act in order to provide physical and programmatic accessibility of facilities, programs, services, technology, and materials, for individuals with disabilities, including complying through providing staff training and support for addressing the needs of individuals with disabilities. VR Technical Assistance Program confirms the availability of assistive technology as well as accessible computers.

Reasonable accommodations are provided for all aspects of a customer's experience in the AJCs, such as during application/registration for, and provision of, aid, benefits, services, and training. Accommodations are made according to the individual's need in order to ensure receipt of equal benefits from the program. Disclaimers are added to all publications indicating auxiliary aids and services are available upon request. Reasonable accommodations available include a large keyboard and calculator, a trackball mouse, Purple and ZOOM software for individuals with visual impairments, AVAZA Language Line for interpretation or translation services, extended time and readers for assessments. Software, which reads aloud what's on the computer screen and provides methods for navigating and accessing web pages and all screen content for individuals with visual impairments. The system utilizes 771 TTY number for all centers.

C. Fiscal Management

In accordance with WIOA Section 107(d)(12)(B)(i)(II) and the Interlocal Agreement for the Southeast Tennessee Local Workforce Development Area, the Chief Local Elected Official has designated the Southeast Tennessee Development District (SETD) as the Fiscal Agent for the local area.

Local Procurement Policies and Procedures

SETD complies with federal and state procurement regulations and policies and adheres to The Purchasing and Property Management Policy of the STLWDB related to specific instructions for procurement for WIOA-related acquisitions of property and services.

Requests for Proposals (RFPs) are managed by the board staff following Competitive Procurement Process established by the STLWDB that outlines the procedures to be followed and a copy is provided in the attachments.

Non-competitive and Sole Sourcing process is used rarely and is a non-preferred method of contracting or purchasing. Generally, sole sourcing (non-competitive procurement) is only utilized when three bids are required for competitive procurement, but only one provider is present, or one bid is received. A written explanation of the sole sourcing event is provided. Every sole source justification must contain a valid justification for not utilizing a full and competitive process.

Meeting the Required 50 Percent Minimum Participant Cost Rate

The Career Services provider is contractually required to expend a specified aggregate amount on eligible WIOA participant training and other services during a program year. In order to align the budget and expenses with fall, spring and summer postsecondary enrollments, the Career Service provider follows a trimester approach for its budget.

SETD finance staff obligates ITAs and supportive services request (SSR) upon receipt of the ITA and SSR. These obligations are either confirmed or modified upon payment of the invoices and reconciled in Financial Edge. Contracts with employers for IWT and OJT grants are obligated upon the execution of the contract for the program year in which reimbursement of training costs will be made.

SETD finance staff enters obligations and payments into the accounting tracking system. Finance and board staff track obligations and expenditures as they are entered in the Financial Edge to ensure MPCR requirements are met. If expenditures do not reflect the targeted MPCR, then increased enrollments and provision of services will mitigate the issue. The provider's staff will also identify ways to serve eligible participants who are receiving scholarships such as Tennessee Reconnect.

Through frequent expenditure and budgetary tracking, the local area will continue to meet the MPCR. In PY17-18, the local area reached a year-end MPCR of 62%.

D. Approach For Transfer of Title I Workforce Funds

The local board can expend up to 100% of Adult funds for Dislocated Worker activities and up to 100% of Dislocated Worker funds for Adult activities. As such, in order for the local board to move funds from Dislocated Workers funding stream to the Adult funding stream, there must be supporting documentation indicating the required rate of expenditure/obligations and other specified criteria have been met. The local area's quarterly Adult and Dislocated Worker participant expenditures is the basis for determining the amount of funds to be transferred from Dislocated Worker to Adult funding streams.

One of the local strategies for workforce development is the IWT grant program. For PY18-19, the local board has elected to use TDLWD's CBG block grant funds. If, however, in future program years the CBG funds are not approved by the SWDB, then local funds have been approved by the board for the IWT program. Up to 20% of Adult and Dislocated Worker formula funds may be used for the IWT grant program during any given program year. The board recognizes that it has the ability to invest up to 10 percent of Adult and Dislocated Worker funds for a Transitional Jobs program and will do so when the opportunity arises.

For PY18-19, the local board has approved the use of TDLWD's block grant funds for Consolidated Business Grants (CBG) which has allocated a total of \$555,000 for each of the nine local workforce development areas. The CBG funds may be used for OJT, Apprenticeship Training Grants or IWT; however, the board has approved the use of CBG funds for IWT only. If, however, CBG funds are not approved by the State Workforce Development Board during a given program year, then the local board will authorize the use of up to 20% of Adult and Dislocated Worker formula funds according to WIOA Sec. 134(d)(4). The IWT grant program allows employers in the local area to be reimbursed for the costs of quality training programs for existing employees to make them more competitive and thereby make the employer more competitive. The IWT grant program outcomes may lead to skills attainment, skill upgrade, process improvement, and may result in a certification.

The local board is in the process of reviewing the Transitional Jobs Policy. A Transitional Job is defined as a time-limited work experience that is wage-paid, subsidized, and combined with comprehensive employment and supportive services. The transitional job worksite can be in the public, private, or non-profit sectors and provides opportunities for individuals with significant barriers to employment who are chronically unemployed or have inconsistent work history. These jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment.

E. Executed Cooperative Agreements

STLWDA currently operates under one cooperative agreement which is the Memorandum of Understanding (MOU). The MOU includes all required partners, the local board, chief local elected official, and OSO. On behalf of the local board, the board staff is planning to engage the Tennessee Department of Correction, county Sheriff's Departments, county Department of Corrections, where applicable, Second Chance MOU partner, and other local service providers that assist with programs helping justice-involved individuals (ex-offenders) reenter the workforce. The overarching goal is to develop and implement a reentry partnership network

focused on launching evidence-based practices, such as the previously discussed Greene County Correctional Career Pathway Program.

F. Title VI Trainings to All Service Providers, One-Stop Operators, and Board

All Career Services, One-Stop Operator and Board staff have received copies of Title VI training. Mid Cumberland Human Resource Agency facilitated training for the Career Services and One-Stop Operator staff. The board staff received training from SETD, the Administrator and Fiscal Entity. Going forward, all newly appointed board members will receive Title VI training and copies of the training will be included in their local workforce development board orientation packet.

III. NEW LOCAL PLANNING ELEMENT COMPONENT

Workforce and Correction Partnership

A. Assessment of Need and Population Size

The TDOC reports that the October incarceration population is 30,361, monthly felon inmate releases are 4,419, annual probations are 65,670, and monthly parole populations average 11,007. By extrapolation, the regional data may reflect approximately 30% of these numbers. Total jail population by county in the 10-county local area is 3,235.

Data for formerly incarcerated served by the area's public workforce system will provided annually. According to VOS, the local area served 94 justice-involved individuals (offenders) from July 1, 2016 to December 20, 2018.

Partners will share information either through Dropbox, email, and partner case management meetings.

B. Services – Who, What, When, and How of Alignment

The local board and the Regional Planning Council will engage the Community Based Organizations, local TN Department of Corrections offices, parole and probation representatives as well as mental health and recovery programs through Cooperative Agreements relative to the reentry and workforce development efforts for justice-involved individuals. The Cooperative Agreements will ensure that the public workforce system in the region provides career services, job services, training services and supportive services where appropriate. The fusion of the public workforce system with the correctional, parole and probation programs will facilitate seamless, integrated, and effective services to this targeted population.

The local area currently has three counties participating in programs that assist incarcerated individuals with recovery program that may lead to full-time employment or quicker release from incarceration. Where appropriate, the "Correctional Career Pathways: A Journey to Hope" which is an evidence-based practice being replicated by the Grundy County Sheriff's Department may be implemented. One significant challenge regarding formerly incarcerated job search and placement is that many will be paid wages that will not induce long-term attachment to the labor market. Therefore, sector-strategy training may increase the odds of long-term attachment to the workforce due to earning self-sufficiency wages.

Services needed include mental health and substance abuse counseling, soft skills, life skills, resume' writing and mock interviews as examples. Where possible, the goal is to replicate the "Correctional Careers Pathway: A Journey to Hope" program in place at the Grundy County Sheriff's Department and offers specific program components leading to gainful employment. Partnerships for coordination of reentry services are in progress.

Plans are underway to identify all services provided in the region for modification. The local area's workforce system partner, f2fChattanooga (Father to the Fatherless), is the Second Chance grantee and provides services to justice-involved individuals particularly those who have been formerly incarcerated. They promote and hold quarterly job fairs in the Chattanooga AJC which includes an orientation day prior to the job fair. Employers hire participants on site during the event.

Ex-offenders face many barriers to employment. While some barriers are psychological, attitudinal, and social in nature, others involve key economic/financial barriers, educational, skill-related, lack of community support, lack of family support, knowledge, and legal issues such as legal fees and restitution requirements. Taken together, these barriers prevent people with criminal records from developing an effective job search and finding rewarding jobs. Therefore, all needed supports will be identified to ensure successful and sustained employment.

Per WIOA requirements, services will be provided to those with the greatest need (i.e. a family to support, no transportation, child care needs, recovering user, etc.) and can be identified via intake and partner referral. Of utmost concern is the national opioid crisis. The reentry programs must also focus on opioid use/abuse to align with the state's initiative and to help mitigate and eradicate this crisis.

Plans are underway to partner with parole and probation reps to ensure the proper timing of services during pre-release and to ensure that the individuals receive the services that ensure their success. Prior to release, the career services staff can obtain information about the individual such as educational attainment, previous work history, existing and transferrable skills, career goals, etc. The more information gathered prior to release, the more effective the program services will be.

The intake and case management will remain the same, and staff will learn of corrections education from the releasing institution or the parole officer's detailed case records.

The Business Services Team, including board staff, communicate to employers regarding such benefits as WOTC, Federal Bonding, and other job placement agencies that work with the targeted population.

C. Relationship to Regional Labor Market Needs, Regional Sector Pathways Programs, and Regional Partnerships

The region successfully adheres to sector strategies for job placement and will use the same for this population. Advanced manufacturing, a board-approved sector, is in dire need of workers in the region and is having difficulty finding the workers. If VW expands to produce the electric SUV, then there will be a nearly immediate need of 1,500 production workers at the facility.

Training will be identified as needed for the local area and region to help serve this population.

As partnerships are developed via meetings and planning, sector-supported occupations will be communicated to partners. Identification and engagement of employers, industry sector partnerships, and labor-management partnerships that are willing to hire justice-involved individuals including formerly incarcerated and under state supervision will be accomplished through several methods. Initial announcements for employer opportunities to hire justice-involved individuals will occur at the local workforce development board meeting. Additional announcements will be made by board staff via emails to former and existing employers who received training grants. The volume of job placements will be based on the employers' hiring needs and will occur under the assumption of a growing local and regional economy.

The Cooperative Agreement which establishes the workforce-corrections partnership will detail shared case management policies and conditions in order to maximize the partner synergies for successful outcomes. Communication between workforce and correction staff will be critical to program success.

Case Managers will include the parole and probation representatives in all correspondence relating to workforce services, employment plans, assessments, and any other services.

The public workforce system partners may all participate at some level to provide services to this targeted population (e.g. HUD partner and housing). Outlined in a Memorandum of Understanding, workforce professionals will work with CBOs to provide peer support, housing, transportation, food, family reunification, and other supportive and direct services. Referrals will be made to CBOs that provide one or more of the services mentioned above. Front-line staff are trained to know where to refer participants for needs fulfillment if the services are not provided by the AJC partner and include local CBOs who will partner in the reentry program.

I. Purpose

To define and provide guidance concerning the use and administration of Individual Training Accounts (ITA) and the criteria concerning eligibility and suitability for customers requesting WIOA training assistance in Local Workforce Development Area 5 (LWDA 5).

II. Background

One of the key purposes of the Workforce Innovation and Opportunity Act (WIOA) is to provide workforce investment activities that increase the employment, retention, and earnings of participants, and increase attainment of recognized postsecondary credentials by participants. The targeted results of training are to improve the quality of the workforce, reduce welfare dependency, increase economic self-sufficiency, meet the skill requirements of employers, and enhance the productivity and competitiveness of the Nation.

WIOA provides more flexibility for American Job Center (AJC) staff to issue ITAs for apprenticeship programs. An ITA is used for a participant to access training services from an entity on the State's approved Eligible Training Provider List (ETPL).

III. Instructions

WIOA funds shall be used to provide training services to customers:

1. who, after an interview, evaluation, or assessment, and career planning, have been determined to:
 - a. be unlikely or unable to obtain or retain employment that leads to economic self-sufficiency;
 - b. be in need of training services to obtain or retain employment that leads to economic self-sufficiency; and
 - c. have the skills and qualifications to successfully participate in the selected program;
2. who select programs directly linked to in-demand occupations in the local area or planning region, or in another area to which the individual is willing to commute or relocate;
3. who are unable to obtain other grant assistance, including Federal Pell Grants or require assistance beyond the assistance made available under other grant assistance programs
4. who are determined eligible in accordance with the *Adult Priority of Service policy*

WIOA funds shall be used to support high-quality education, training, and other services that:

1. align with the skill needs of industries in the economy of the State or regional economy involved;
2. prepare an individual to be successful in any of a full range of secondary or postsecondary education options, including registered apprenticeships;
3. include, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;

4. organize education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
5. enable an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and
6. help an individual enter or advance within a specific occupation or occupational cluster.

STLWDB shall abide by the following conditions regarding WIOA-funded training:

1. AJC staff will be able to obtain a participant’s postsecondary financial aid information
2. AJC staff will ensure that participants have access to the ETPL
3. ITAs are approved by the AJC Title I Managers and sent electronically to LWDB Quality Assurance Department for budget and voucher approval in VOS.
4. LWDB does not allow full ITA payment for entire programs beyond each training period unless the institutions have a refund policy requiring that the tuition must be paid in full
5. LWDB allows ITAs to pay for the full cost of training ((e.g., books, license fees, training materials, registration fees, supplies, uniforms) that the financial institution does not cover
6. AJC staff ensures that participants have a choice for her/his training provider
7. When considering community-based organizations or other private organizations who desire to serve special participant populations, the LWDB shall consider the following criteria:
 - a. Financial stability of the organization
 - b. Demonstrated performance in measures appropriate to the program
 - c. The relevance of the specific program to STLWDA’s identified needs

Basic Skills:

Prior to being determined eligible for WIOA training funds, all WIOA customers must have a High School Diploma or a High School Equivalency Diploma and meet one of the following basic skills requirements:

Training less than one year:

Minimum 10th grade on TABE or CASAS in Reading, Math and Language

Training one year or greater:

Minimum 12th grade on TABE or CASAS in Reading, Math and Language

WIOA customers currently attending a Post-Secondary Institution:

Minimum GPA of 3.0 on transcripts and/or official letter showing student is in good standing in the current program

WIOA Customers attending Allied Health programs:

Achievement of the minimum requirements on the Nursing Entrance Test (NET), Health Occupations Basic Entrance Test (HOBET), or other equivalent industry specific entrance exam

Individual Training Account Duration:

The duration of the training will be determined by the nature and length of the course requirements.

Individual Training Account Limits:
(see Attachment A)

<u>Program of study leading to a two year degree:</u>	\$4,000 per year for a maximum of two years
<u>Program of study leading to a four year degree or higher:</u>	\$8,000 maximum
<u>Program of study leading to a certification, industry recognized credential, or license:</u>	\$5,000 maximum

Training Discounts:

All students, regardless of the method of payment, are to be charged the same tuition. WIOA is not permitted to pay more or less for the cost of training than what is required of non-WIOA sponsored students.

IV. Exceptions

Exceptions and/or accommodations to this policy may be made on a case-by-case basis with prior approval by the One-Stop Operator.

This policy does not create a right by any individual to receive any amount of funding, nor does it create an obligation by the Southeast Tennessee Development District to pay any amounts of funds on behalf of an individual or group. Training is approved based on need, as determined by the Career Service Coordinator and the availability of funds as determined by the Southeast Tennessee Development District, subject to the maximum limitations outlined in this policy.

The LWDB recognizes certain exceptions to the use of ITAs. Contracts for services may be used instead of an ITA only when one or more of these exceptions apply (***WIOA Section 134(c)(3)(G)(ii)***):

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

AUTHORIZED BY:

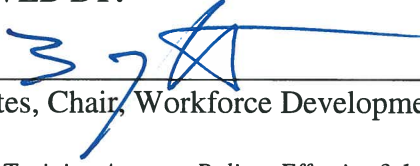


9/12/18

Michele Holt, Director, Workforce Development

Date

APPROVED BY:



9-12-18

Tony Cates, Chair, Workforce Development Board

Date

Individual Training Account Policy; Effective 3.14.18, Revised 09.12.18

I. Purpose

The purpose of this policy is to address the use of Workforce Innovation and Opportunity Act (WIOA) funds for supportive services to eligible participants enrolled in WIOA Title I Adult, Dislocated Worker and Youth programs. Procedures include documentation requirements to show that the supportive service is allowable, reasonable, and not otherwise available to the participant. This policy rescinds any prior policy regarding supportive services in STLWDA.

II. Background

The Workforce Innovation and Opportunity Act (WIOA) defines supportive services in **WIOA Sec. 3(59)** as services such as transportation, child care, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under this Act. Supportive services for Adults and Dislocated Workers are further referenced in WIOA Secs. 134(d)(2) and (3) and for WIOA eligible Youth in section 129(c)(2)(G) and are governed by 20 CFR 680.900 through .970. Supportive services are not entitlements and must be supported by demonstration of financial need. Supportive services are limited and must be leveraged with other local resources, including co-enrollment with core partner programs.

III. Instructions

AJC Title I staff should ensure that supportive services only be provided when the services are not available elsewhere, since WIOA is considered funding of last resort. When participants need supportive services, staff will follow the procedures below:

1. The participants need for the provided service must be determined in the initial and ongoing assessment and must be documented in the case file; participants enrolled in Individualized Career or Training Services must demonstrate need in the Individual Employment Plan (IEP) or Individual Service Strategy (ISS).
2. The cost of supportive services must be reasonable and competitive in process. When multiple options are available for receiving supportive services, documentation must show a reasonable effort was made to determine and choose the lowest, most competitive price available.
3. The cost of Supportive Services must be necessary to participate and an allowable cost under Federal guidelines.
4. Supportive Services may not be provided prior to an individual's registration date in WIOA activities.
5. The need for Supportive Services will be determined on individual basis, in coordination with PELL and other federal and local funds, including core partner programs, and the availability of local formula funds.
6. Supportive Services are meant to be short-term measures and may be limited both in duration and amount.
7. Supportive Services may only be provided to active Adult and Dislocated Worker participants prior to exiting from the program; however, follow-up services for Youth may include supportive services.
8. Customers will only be reimbursed for training related expenses when requested and approved prior to the expense occurring.

9. If the cost of the Supportive Service exceeds the approved amount, a modification request may be submitted with verification/justification of the increased amount.

The following Supportive Services may be provided to Adult and Dislocated Workers in WIOA Individualized Career and Training Services. Youth Supportive Services should enable an individual to participate in WIOA Activities:

- Linkages to community services
- Assistance with transportation (See Guidance Attachment A)
- Assistance with child care and dependent care (See Guidance Attachment B)
- Assistance with housing (rent only, no mortgage payments)
- Needs related payments
- Assistance with educational testing
- Reasonable accommodations for individuals with disabilities
- Legal aid services
- Referrals to health care
- Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes
- Payments and fees for employment and training-related applications, test, and certifications
- Other Supportive Services that have not been described in this policy may be considered on a case by case basis when presented in a written statement of need.

Needs Related Payments:

Individuals in need of training services may not have the resources to participate in the training. Needs related payments are designed to provide a participant with financial assistance to meet the needs of their non-training expenses for the purpose of enabling them to engage in training services **WIOA Sec. 134(d)(3)** that lead to in-demand occupations. Unlike other supportive services, in order to qualify for needs related payments a participant must be enrolled in training. Needs related payments are stipends paid directly to the eligible participant, up to the date of completion of training, or the last day of attendance. NRP's are not wages and therefore are not reportable as taxable income. Participants must be attending full-time to receive needs related payments.

1. To Receive Needs Related Payments:

- a. Adults and Out-of-School Youth (ages 18-24) must:
 - i. Be unemployed;
 - ii. Not qualify for, or have ceased qualifying for, unemployment compensation; and
 - iii. Be enrolled in a program of training services under *WIOA Section 134(d)(4)*
- b. Dislocated Workers must:
 - i. Be unemployed, and (**20 CFR 680.950**):
 - ii. Have ceased to qualify for unemployment insurance or trade readjustment allowance under TAA; and
 - iii. Be enrolled in a program of training services under *WIOA Section 134(d)(4)* by the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated worker, or, if later, by

the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months; or

- iv. Be unemployed and unable to qualify for unemployment insurance or trade readjustment assistance under TAA and be enrolled in a program of training services under **WIOA Section 134(c)(3)**.

2. The Level of Needs Related Payment made:

- a. To an Adult or Out-of-School Youth ages 18-24, shall not exceed the poverty level for a family of one for an equivalent period. The weekly payment level will be calculated by dividing the poverty level by 52 weeks. (Example: Poverty level for family of one - \$12,060 / 52 weeks = \$231.92 weekly, \$463.84 bi-weekly)
- b. To a dislocated worker shall not exceed the greater of **(20 CFR 680.970)**—
 - i. The applicable weekly level of unemployment insurance compensation for participants who were eligible for unemployment insurance compensation as a result of a qualifying dislocation; or
 - ii. The poverty level for an equivalent period, for participants who did not qualify for unemployment compensation as a result of the qualifying layoff. The weekly payment level must be adjusted to reflect changes in total family income provided in the most current LLSIL Guidelines.

Needs related payments may be provided if the participant has been accepted in a training program that will begin **within 30 calendar days**. Payments will be terminated for participants upon completion of training or at the point they are no longer attending. The Governor may authorize local areas to extend the 30-day period to address appropriate circumstances **(20 CFR 680.960)**.

Documentation Requirements:

Eligible participants must provide a written statement of need along with any requested supporting documentation for supportive services to be paid directly to the participant. All documentation requirements must be kept in accordance with the LWDBs **Electronic Case Files Guidance**.

Unallowable Support Services:

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

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

Funding Limits:

Total Supportive Services awarded per participant will be based on a sliding scale. The total amount of supportive services during a semester for participants receiving the maximum amount of ITA limits may not exceed:

- \$1,500 per semester, or
- \$1,500 per non-semester training program

*Total Supportive Services awarded per participant not receiving the maximum amount ITA services may not exceed the higher of:

- The total WIOA funded amount of set ITA limits by semester for program length plus \$1,500 per semester/non-semester training program

Example: ITA limits broken out by maximum amount per semester (\$1,250), but ITA is not needed - customer must not exceed \$2,750 (\$1,250 + \$1,500) in supportive services.

Duration Limits:

Participants in training services as defined in WIOA secs. 134(c)(2) and (3) may receive supportive services on a semester by semester basis through completion of training or at the point they are no longer attending.

Participants receiving supportive services in coordination with career and employment related activities are eligible for up to six months, at which time review of individual needs may result in services for an additional six-month period. Justification must be clearly documented in the participant's case file.

Availability of Funds:

All services under WIOA are subject to change due to the availability of funding, and/or Local Board policy and directive.

Exceptions:

A waiver signed by the Director or his/her designee is required for any requests exceeding funding or duration limits set forth in this policy. Career Service Providers signatory authority must submit such request in writing with reasonable justification and supporting documentation when appropriate to the Director or his/her designee.

Priority of Service:

Participants in WIOA programs who face significant barriers to employment – such as recipients of public assistance, low-income individuals, or individuals who are basic skills deficient – should be given service according to their level of need. Please refer to the LWDA's *Adult Priority of Service Guidance* concerning the order of service delivery.

Duplication of Services:

Funds for supportive services should be monitored to ensure that they are spent in a manner that avoids redundancy. Please refer to the LWDA's *Co-Enrollment Policy* for more information concerning co-enrollment of participants in multiple programs and best practices to leverage resources for maximum benefit.

AUTHORIZED BY:



9/12/18

Michele Holt, Director, Workforce Development

Date

APPROVED BY:



9-12-18

Tony Cates, Chair, Workforce Development Board

Date

Supportive Services Policy; Effective 3.14.18, Revised 9.12.18

Supportive Services Policy– Attachment A Transportation Assistance Guidelines

Transportation Assistance may be provided to participants who:

- live at least ten miles (one way) from the training site AND can demonstrate the need to receive such services by providing a written statement for the file
AND
- who are entering **WIOA sponsored training services** or who are actively participating in **WIOA approved training services**

Expectations of WIOA Participants:

- Participant must submit an Attendance Verification Form on a monthly basis. Attendance Verification Forms must be submitted to the American Job Center by the 5th of the following month. **Forms received after the 5th of the following month may not be paid.**
- Participants must complete Attendance Verification Forms in **blue or black ink only.**
- Participants must maintain satisfactory progress while in training to remain eligible for all WIOA services including transportation.
- Participants must maintain **monthly contact** with the Title I Career Service Staff to remain eligible for all WIOA services including transportation.

The following restrictions shall apply to transportation assistance:

- Title I Career Service Staff will determine eligibility to receive transportation assistance on a semester by semester basis. Eligibility is based on the participant's status at the time of the request as well as the availability of funds. Therefore, eligibility to receive transportation assistance for a particular semester does not guarantee eligibility to receive transportation assistance for future semesters.
- Title I Career Service Staff will update and assess the participant's residency, training site, financial need and academic status each semester in order to verify continued eligibility to receive transportation assistance.
- Title I Career Service Staff will verify the participants current address prior to submitting an SSR for approval by collecting two forms of identification (Drivers License or State Issued ID **AND** Utility Bill, Voters Registration Card or Documentation from a State/Federal agency validating the address). Both forms of ID should have the same address and match the address in VOS. Title I Career Service Staff should MapQuest driving directions to verify that the customer lives 10 or more miles one way from their residence to the training site. Both forms of ID and the MapQuest print out should be attached to the approved copy of the SSR in the file.
- Title I Career Service Staff must submit an SSR each semester/quarter to request continuation of transportation assistance (*after verifying the customer's current address and distance from the training site by following the process above*).
- Payments will be made based on a monthly Attendance Verification Form submitted by the participant and approved by the appropriate authorized staff.
- Payments will be terminated for participants upon completion of training or at the point they are no longer attending.

- Payments will not be made to participants who fail to reply to requests for communication from Title I Career Service Staff.
- Payments may be terminated if the participant fails to follow the proper procedures for submitting the Attendance Form.
- Transportation payments will be made in the amount of **\$10.00 per day** of classroom attendance and may not exceed **\$50.00 per week**.
- **All supportive services offered through WIOA are contingent upon the availability of funds and may be discontinued at any point.**

Job Search Transportation Assistance may be provided to participants who:

- Are actively engaged in **job search activities** which require them to travel from home to a place of business to submit an application, attend and interview or provide any required information for a potential job placement (drug screens, background checks, etc). This can include daily visits to the Resource Room for internet based job search activity.
- All job search transportation assistance will be approved on a case-by-case basis, may be offered for up to **6 months**, and will be reimbursed monthly at a rate of **\$10.00 per day** with a maximum of **\$120.00 per month (12 days per month)**.
- Job search participants will be required to provide a job search log form to the Title I Career Service Staff with the Attendance Verification Form.

I have read the Transportation Assistance Guidelines and understand the expectations required of me in order to receive this service.

Participant Signature: _____

Date: _____

Supportive Services Policy– Attachment B Childcare Assistance Guidelines

Child Care Assistance is a Supportive Service. In addition to the current Supportive Service policy, the following conditions apply:

Child Care Assistance may be provided to customers who:

- Have dependent children in need of child care
- AND**
- Are actively participating in **training services**

Expectations of WIOA Customers:

- Customers must submit a receipt of child care payment on a monthly basis. Receipts must be submitted to the Career Center within 3 business days of the time period end date.
Receipts for payment received after the 3rd business day may not be paid.
- Customers must maintain satisfactory progress to remain eligible for all WIOA services including child care
- Customers must maintain **monthly contact** with their Career Service Coordinators to remain eligible for all WIOA services including child care

The following restrictions shall apply to child care assistance:

- WIOA staff will determine the amount of time that the customer will receive child care assistance.
- WIOA staff will periodically review the customer's financial and academic status in order to verify customers continued eligibility to receive child care assistance.
- WIOA staff must submit a new SSR each semester/quarter to request reimbursement for child care assistance
- Payments will be made based on receipts submitted by the customer and approved by the appropriate authorized staff.
- WIOA staff reserves the right to terminate child care payments to customers who fail to follow requirements of the WIOA program.
- Child care payments will be terminated when a customer stops attending training as outlined in the WIOA Individual Employment Plan. (Customer drops out of training)
- Child care payments will not be made to customers who fail to reply to requests for communication from WIOA staff.
- All supportive services offered through WIOA are contingent upon the availability of funds and may be discontinued at any point.
- Any child care service not outlined in this document must receive WIOA Assistant Director approval.

I have read the Child Care Assistance Guidelines and I understand the consequences of failing to abide by the statements listed above.

Customer Signature: _____ Date: _____

I. Purpose

This policy communicates methods used by Tennessee Department of Labor and Workforce Development (TDLWD) for the procurement of goods and services obtained with Workforce Innovation and Opportunity Act (WIOA) funds. This policy also sets forth the requirements provided by: the Office of Management and Budget (OMB), Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule Title 2 of the Code of Federal Regulations, 2 CFR 200.

II. Background

WIOA Section 184(a)(3) requires the Governor of each State, each local area (including the chief elected official for the area) and each provider receiving funds under WIOA to comply with the appropriate uniform administrative requirements for grants and agreements for entities receiving the funds. The OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Final Rules Title 2 of the Code of Federal Regulations, 2CFR 200 supersedes and streamlines requirements from OMB Circulars A-21, A-110, A-122, which have now been placed in 2 CFR (200, 225, 215, and 230). OMB Circulars A-87, A-110, A-122, A-133 and their requirements are still in effect for funding distributed prior to December 2014. Funding awarded after December 26, 2014, must be in compliance with 2 CFR 200.

III. Instructions

The STLWDB will

1. follow the procurement procedures outlined in this policy which reflect applicable State and local laws and regulations.
2. maintain a contract administration system which ensures that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
3. maintain written code of standards of conduct governing the performance of their employees engaged in the selection, awarding of, and administration of contracts. No employee, officer or agent of the grantee or sub grantee shall participate in any way (including discussion, review and/or voting) in the selection, or in the awarding of, or administration of a contract supported by Federal or State funds in a conflict of interest, real or apparent, would be involved. Such conflicts when:
 - a. The employee, officer (for the purpose of this policy, workforce board members shall be considered as officers), or agent,
 - b. Any member of his immediate family,
 - c. His or her partner, or
 - d. Any organization which employs, or is about to employ any of the above, has a financial or other interest in the firm selected for the award. The grantee's or sub grantee's officers, employees, or agents will neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub agreements.

Written prior approval must be obtained from TDLWD for acquisition of sensitive items and nonexpendable property with a unit acquisition cost of \$5,000 or more. In addition, any agreements or activities related to costs associated with real property must receive written approval by TDLWD. Disregard of this policy may result in an immediate sanction to pay back the money to TDLWD using unrestricted funds.

The STLWDB must have property inventory systems that meet the standards required by 2 CFR 200.313(d)(1)(5) for equipment and standards required by 2 CFR 200.331-312 for real property. The STLWDB will maintain the inventory system at a minimum quarterly scheduled basis, with scheduled reviews and updates being well documented. The system must include property purchased with WIOA funds as well as property transferred from WIA, JTPA, or CETA to WIOA. The Governor shall maintain accountability for property in accordance with State procedures and the record retention requirements of 2 CFR 200.333(c)(d). When original or replacement equipment (acquired under a grant or sub grant) is no longer needed for the original project or program or for other activities supported by a Federal agency, the equipment will be returned to the State.

Equipment – Equipment means tangible, non-expendable, personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. Uniform Guidance specifies that equipment include information technology systems, computing devices, software and services (including support services). This includes fees for licensing or subscriptions to software support services. This even includes monthly subscription fees under \$5,000 dollars if the total annual cost for the subscription exceeds \$5,000 dollars; for such subscriptions, prior approval must be obtained.

General Purpose Equipment – This is equipment which is not limited to research, medical, scientific or other technical activities. Examples include: office equipment and furnishings, modular offices, telephone networks, information technology equipment and systems, air-conditioning equipment, reproduction and printing equipment, and motor vehicles (Uniform Guidance Section 200.48).

Information technology systems – This encompasses computing devices, ancillary equipment, software, firmware, similar procedures, services (including support services), licensing or subscriptions to software and software support services, and related services (Uniform Guidance Section 200.58).

Types of Property for which accountability must be maintained:

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

All STLWDA procurement of sensitive equipment or procurements having a unit acquisition cost of \$5,000 or more must have prior written approval from TDLWD. The Governor, on behalf of the US Department of Labor (USDOL), reserves the right to claim title to all property purchased with

WIOA, WIA, JTPA, or CETA funds with a current per-unit fair market value in excess of \$5,000.
Property Accountability 114S-60.401 Classification Criteria.

Equipment Property Management Procedures

Property records must be maintained that include a description of the property, a serial number or other identification number, the source of property, information as to who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the cost of the property. These records must also include the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.

1. When property with a current per-unit value in excess of \$5,000 has been stolen or destroyed by fire (or another disaster), is considered obsolete, or is to be traded for new equipment the STLWDB shall notify the State office of the particular event and request approval to remove the property from the Record Inventory.
2. If any property is stolen a copy of a Police Report must accompany the Report of the Survey. If the stolen property has a current per-unit value of \$5,000 or more the Federal Bureau of Investigation must be notified, and a copy of the report must accompany the Report of the Survey.
3. If the property is destroyed by fire a copy of a Fire Marshall's Report must accompany the Report of the Survey. When the STLWDB determines that the property is non-serviceable due to obsolescence, that STLWDB will request the destruction of the equipment through Asset Works (the State system) at which time the State procurement office re-evaluates the condition of the equipment. TDLWD will review the request and approve it with instructions to forward it to the requesting LWDA before the State Procurement Office re-evaluates the condition of the equipment. All property records must be maintained for three years after final disposition of property. For additional information regarding disposition please see Provision 4 Section D of the Supplementary Financial Guide.
4. STLWDB will tag all property with the appropriate tag and the contractor's records must indicate the program under which the property was acquired. Upon request, tags will be provided by the TDLWD to the contractor. After tagging the equipment the contractor should add the new items to its inventory listing. The contractor inventory records must contain the following information:
 - a. Tag number
 - b. Program funding the acquisition
 - c. Percentage federally funded (if not 100%)
 - d. Date of purchase or acquisition
 - e. Condition of the property (Cost or Fair Market Value)
 - f. Location
 - g. Serial number of other identifying number should be added to other pieces of equipment acquired.

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

Purchase Considerations

Although Uniform Guidance and DOL Exceptions do not address every possible cost, they serve as the foundation for all grant financial management; for this reason, sub recipients should rely on this guidance to avoid audit findings and potential liability. To ensure that funds are being spent in a fiscally prudent and efficient manner, sub recipients need to consider the following questions prior to requesting approval to direct-charge WIOA funds for the purchase of property:

- Is this purchase reasonable?
- Why is the purchase needed?
- Have the best products been selected?
- What procurement method was used?
- Was a lease option considered in lieu of the purchase?
- Does the State already provide the item, service, or software being considered for rent, purchase, or subscription?
- Can the purchaser show that the purchase and item is allowable under the applicable federal award?

Leasing Considerations

The decision to lease or buy personal property should be governed by considerations of economy. Considerations for leasing may differ by property type and according to market conditions. The length of the contract period of the lease should also be considered. Leasing with an option to purchase is generally preferable to straight leasing. However, for real property, administrative requirements make leasing the only option since the construction or purchase of real property is not allowed under the WIOA program except in limited circumstances which are outlined in the following section.

Capital Assets and Construction Costs

The WIOA Title I funds may not be spent on construction, or may not be used to purchase facilities or buildings, or used for other capital expenditures for improvement to land or buildings (20 CFR 667.260) except with prior written approval by the DOL Secretary. The exceptions to that rule in which WIOA Title I funds can be used for construction include the following:

- Meeting obligations to provide physical and programmatic accessibility and certain repairs, renovations, alterations, and capital improvements to the property.
- For disaster relief projects
- For Youth Build programs under WIOA Section 171(c)(2)(A)(i).
- For any other projects the DOL Secretary determines are necessary to carry out WIOA
- Section 189(b) and (Title 20 CFR Section 683.235).

Limitation

Cost allocable to another Federal grants, WIOA programs, or cost categories may not be shifted to a WIOA grant, sub grant, program or cost categories to overcome fund deficiencies, avoid restrictions imposed by law or grant agreements, or for other reasons (2 CFR 200.405(c)).

Real Property

The Uniform Guidance provides fiscal and administrative guidance for the administration of the WIOA program including requirements for purchasing property. The Uniform Guidance does not permit WIOA program funds to be used to purchase land, or for improvements to land, or to the

structures, or to accessories thereto and excludes the purchase of moveable machinery and equipment (2 CFR 200.85).

Rental Costs

Subject to the limitations described below, rental costs are allowable to the extent that the rates are reasonable in light of such factors as: rental costs of comparable property, if any; market conditions in the area; alternative available; and the type, life expectancy, condition, and value of the property leased. Rental costs under sale and leaseback arrangements are allowable only up to the amount that would be allowed had the governmental unit continued to own the property. Rental costs under less-than-arms-length leases are allowable only up to the amount that would be allowed had title to the property vested in the governmental unit. For this purpose, less-than-arms-length leases include, but are not limited to, those where:

- (1) Only party to the lease is able to control or substantially influence the actions of the other;
- (2) Both parties are parts of the same governmental unit; or
- (3) The governmental unit creates an authority or similar entity to acquire and lease the facilities to governmental unit and other parties.

Rental costs under leases, which are required to be treated as capital leases under GAAP, are allowable only up to the amount that would be allowed had the governmental unit purchased the property on the date the lease agreement was executed. This amount would include expenses such as depreciation (please note depreciation is also addressed in the Supplementary Financial Guide), maintenance, and insurance. The provisions of GAAP shall be used to determine whether a lease is a capital lease. Interests costs related to capital leases are allowable to the extent they meet the criteria in 2 CFR 200.449.

Maintenance, Operations, and Repairs

Unless prohibited by law, the cost of utilities, insurance, security, janitorial services, elevator service, upkeep of grounds, necessary maintenance, normal repairs and alterations, and the like are allowable to the extent that they:

- (1) Keep property (including Federal property, unless otherwise provided for) in an efficient operating condition,
- (2) Do not add to the permanent value of property or appreciably prolong its intended life, and
- (3) Are not otherwise included in rental or other charges for space. Costs which add to the permanent value of property or appreciably prolong its intended life shall be treated as capital expenditures. (See 2 CFR 200.452, Maintenance and Repair Costs, for additional details and requirements.)

Costs Allowable With State Office


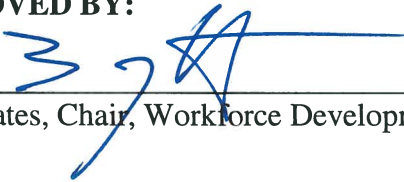
For approval of those selected items of cost, requiring prior approval, the authority to grant or deny approval is delegated to the Governor for programs funded under Sections 127 or 132 of the Act.

Rearrangements and Reconversion Costs (2 CFR 200.462)

Costs incurred for ordinary and normal rearrangement and alteration of facilities are allowable. Special arrangements and alterations costs incurred specifically for a Federal award are allowable with the prior approval of the Federal awarding agency. Costs incurred for rearrangement and alteration of facilities required specifically for the grant program may be approved by the State or the pass-through entity.

Debarred and Suspended Parties

In accordance with WIOA regulations at Final Regulation 20 Section 683.200, the STLWDB will not make any award or permit (sub grants or contracts) to any party debarred, otherwise suspended, or otherwise excluded from eligible for participation in Federal assistance programs in accordance with Department of Labor Regulations at 29 CFR Part 98. Recipients and subrecipients shall comply with the applicable requirements of the DOL Regulations at 29 CFR parts 98. State of Tennessee General Services Real Property and Equipment Standards. In addition to adhering to the federal standards set forth in this policy, grant recipients and sub-recipients should also adhere to all property requirements set forth by the State of Tennessee General Services requirements. In the event a conflict arises between State of Tennessee General Service requirements and Federal regulations, please note that Federal regulations will take supremacy over State requirements if the property is utilized to carry out activities associated with a Federal award or purchased with monies from a Federal award.

AUTHORIZED BY:	
	9/12/18
_____ Michele Holt, Director, Workforce Development	_____ Date
APPROVED BY:	
	9-12-18
_____ Tony Cates, Chair, Workforce Development Board	_____ Date
<i>Purchasing and Property Management Policy; Effective 3.14.18, Revised 9.12.18</i>	

The Southeast Tennessee Workforce Development Board (STWDB) and its staff will follow the process outlined herein for provision of services under the **Workforce Innovation and Opportunity Act (WIOA)** requiring a competitive procurement processes following the guidelines set forth in the **Office of Management and Budget 2 CFR 200.319** as follows:

- (a) *All procurement transactions must be conducted in a manner providing full and open competition consistent with the standards of this section. In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, and invitations for bids or requests for proposals must be excluded from competing for such procurements. Some of the situations considered to be restrictive of competition include but are not limited to:*
 - (1) *Placing unreasonable requirements on firms in order for them to qualify to do business;*
 - (2) *Requiring unnecessary experience and excessive bonding;*
 - (3) *Noncompetitive pricing practices between firms or between affiliated companies;*
 - (4) *Noncompetitive contracts to consultants that are on retainer contracts;*
 - (5) *Organizational conflicts of interest;*
 - (6) *Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement; and*
 - (7) *Any arbitrary action in the procurement process.*

- (b) *The non-Federal entity must conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state or local geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts state licensing laws. When contracting for architectural and engineering (A/E) services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.*

- (c) *The non-Federal entity must have written procedures for procurement transactions. These procedures must ensure that all solicitations:*
 - (1) *Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a “brand name or equivalent” description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated; and*
 - (2) *Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.*

(d) *The non-Federal entity must ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the non-Federal entity must not preclude potential bidders from qualifying during the solicitation period.*

Procedures

Draft RFP Review and Approval

Prior to public release, the draft RFP will be submitted to the Executive Committee for review and approval prior to publication. If there are no comments or changes, the RFP will be released.

Committee Appointment

The Chair of the STWDB reserves the right to appoint a Request for Proposal Review Committee as needed. The committee should consist of at least three (3) members of the STWDB and may include other individuals selected by the Board Chair as long as the individual has the technical expertise in terms of the requirements of workforce development activities pursuant to WIOA.

Confidentiality and Evaluator Training

Prior to the release of the RFP, all members of the committee must review and sign the *Confidentiality Attestation* which includes confirmation that he/she received and understands the *RFP Evaluator Training Guide*. The Guide will be provided via email and will contain all necessary information related to the procurement process.

Conflict of Interest

Once all proposals have been received, Board staff will send a *Conflict of Interest Statement* containing a list of all entities submitting a proposal. Each member must sign and return the acknowledgement and declare whether he/she has a conflict. If no conflicts are declared, the proposals will be release for review to the committee members.

Public Notification

In order to foster competitive procurement in accordance with WIOA guidelines, the STWDB maintains a list of potential bidders who will receive the Request for Proposals either in hard copy or electronic format. That list is updated periodically as the STWDB becomes aware of new/different organizations that could have an interest in providing services. The notice of Request for Proposals will be maintained on the STWDB website at www.secareercenter.org.

Additionally, the solicitation will be posted for public notification in our local regional publication, The Chattanooga Times Free Press, as well as our website www.secareercenter.org.

Proposal Response Time

When time permits, the notice of Request for Proposals is posted, and correspondence to potential bidders is sent at a minimum 30 days prior to the submission deadline. With the announcement of solicitation for proposals, we will provide potential bidders a brief background on the service delivery area; the projected amount of funds available for the WIOA program(s) we are soliciting proposals on; instructions for completing the proposal; attachments that must be included with the proposal; the application submission address and deadline; and instructions for questions regarding

the Request for Proposals and/or process. STWDB may require a Pre-Bidder's Conference in order to provide needed clarification for any RFP requirements. This can occur in person or via teleconference with all questions and answers transcribed and posted at www.secareercenter.org.

Proposal Evaluation

The RFP contains the evaluation (score) criteria required for successful performance of the WIOA program. Evaluation factors considered include completeness and timeliness of proposals (all the required elements are addressed/attached, and the proposal was received prior to deadline expiration); reasonableness of costs; performance targets; probability of achieving proposed targets; compliance with WIOA; and past performance (if applicable).

Review and Evaluation

The Workforce Development Director, or appointed Solicitation Coordinator, receives all proposals at the close of the response time and determines if the proposals meet the minimum requirements outlined in the RFP. If the proposals meet the minimum requirements, the proposals are submitted to the RFP Review Committee with a deadline for required scoring. Committee members review and score each proposal independently without the undue influence of others. All proposals are scored against the proposal evaluation criteria and scoring mechanism detailed in the RFP. Scoring must not be done by comparing one proposal to another. All scoring sections must be completed with no section left blank. All scoring should avoid bias and should be consistent throughout the evaluation process.

Award Recommendation

During a scheduled meeting of the RFP Review Committee, the evaluators present the scored RFPs, discuss and review evaluations; a vote is cast in committee to recommend a subrecipient(s) to the Executive Committee and/or Board for contract award vote.

Award/Non-award Notification

Each organization that responds to the RFP with a written proposal is notified via letter of award/non-award based on majority vote at the board meeting.

In the event of no response to a Request for Proposals

The competitive procurement process identified in 2 CFR 200.318-326 will be followed in every instance of procurement. In the event the STWDB receives no response to a Request for Proposals after following the Uniform Guidance competitive procurement procedures, the proposal will be re-released.

Attachments

Confidentiality and Evaluator Training Attestation

Conflict of Interest Statements

F. Title VI Training

Southeast Tennessee Local Workforce Development Area Title VI Training for Board Staff					
Facilitator	SETD Title VI Coordinator	Date	May 2018 – June 2018	Location	Online

Name	Title	Agency
Michele Holt	Workforce Director	Southeast Tennessee Development District
Autumn Derrick	WIOA Program Coordinator	Southeast Tennessee Development District
Stephen Dunn	Special Projects Manager	Southeast Tennessee Development District
Beth Hinkles	Quality Assurance Coordinator	Southeast Tennessee Development District
Beth Keylon	Special Projects Coordinator	Southeast Tennessee Development District

Note: Documentation is maintained in Human Resource office of SETD.

Title VI

Prohibits discrimination on the basis of race in programs and activities receiving federal financial assistance.

1

What is Title VI?

Prohibits discrimination on the basis of race in programs and activities receiving federal financial assistance.

2

What is a Protected Class?

Membership in any group of individuals with the same characteristics that are protected from disparate treatment by federal law and statutes.

- Race
- Color
- National Origin

3

Race

Distinguishes one population of humans from another. The most widely used human racial categories are based on visible traits and self-identification.

Example: Deny program services, aids or benefits, or making assignments based upon race distinction.

4

Color

A group of people recognized as a class on the basis of the visible characteristics of skin pigmentation.

Example: Provide a different service, aid or benefit, or provide them in a manner differently than they are provided to others based upon skin color.

5


National Origin

National origin is a concept that may refer to an individual's place of birth or ancestry.

Example: Intimidate or discriminate against individuals in any manner related to the receipt of any service, aid or benefit. • Language assistance

6

Simple Justice




"Simple Justice requires that public funds, to which all taxpayers of all races contribute, not be spent in any fashion which encourages, entrenches, subsidizes or results in racial discrimination."

-JFK, 1963

Illegal immigrants are protected under Title VI due to the fact they pay taxes.

7

Executive Order 12898



Environmental Justice (EJ) / EO 12898 asks Federal agencies to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.

8

What Title VI Does:

01 Prohibits entities from denying any individual or groups equal access to the benefits of federal funds.	02 Prohibits entities from providing services or benefits to some individuals that are different or inferior to those provided to others.	03 Prohibits locating facilities in a way that would have or have access to a federally funded service/benefit.	Prohibits discriminatory activity in a facility built in whole or part by Federal funds.
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9

What Title VI Does:

05

Prohibits segregation of students based on race, color, or national origin.

06

Prohibits denial from receiving different standards of care, or receiving different standards of care, on the basis of race, color, or national origin.

07

Requires information to be provided in language that can be understood by students with limited English speaking ability.

10

What is covered by Title VI?

Public Schools	Colleges
State and local government	Healthcare facilities
Private schools	Prisons
Private universities	State and local government contractors
Private day care centers	State and local government employees
Private hospitals	State and local government programs
Private nursing homes	State and local government services
Private social service agencies	

This is not an all inclusive list!

11

What is the Purpose of Title VI?

The purpose of Title VI of the Civil Rights Act of 1964 is to **prohibit programs that receive federal funds from discriminating against participants on the basis of race, color, national origin.**


12

What is Discrimination?

To make any distinction between one person or group of persons and others, either intentionally or neglect, on the basis of actions or lack of actions based on race, color, or national origin.

13

Limited English Proficiency (LEP)




Who is a LEP Person?

- Does not speak English as their primary language and has a limited ability to read, speak, write or understand English
- Deaf are not considered LEP
- LEP individuals may be entitled to language assistance

14

Limited English Proficiency (LEP)



You are required to take reasonable steps to help the LEP individual in understanding all aspects of NO CDST to the individual.

- Interpretation: verbal
- Translation: written

If LEP assistance is needed, contact AVAZA at 1.800.482.8292 or <http://avaza.co/pages/ol/>

15

Non-Compliance

Failure to comply with Title VI of the Civil Rights Act of 1964, either applicable law, agency rule, and implementing administrative regulations.

Sanctions for Non-Compliance
Withholding of payments to the recipient under the contract until the recipient complies, and/or Cancellation, termination or suspension of the contract, in whole or in part.

16

Filing a Complaint:

Complaint may be filed by an individual, a class or by a third party within 180 days from the date of the alleged discriminatory act.

Complaint form and grievance procedures are located on our website (www.usden.org). Send to the bottom and click Contact > Scroll to the bottom and click Title VI Complaint Form.

Contact Amber Aling, Title VI Coordinator for any information, questions and/or complaints regarding Title VI (423.424.4262) amberg@usden.org

17

Send complaints to:

Amber Aling, Title VI Coordinator
 423.424.4262
amberg@usden.org
 1000 University Blvd, Suite 1000
 Denver, CO 80202
<http://www.usden.org/avaz>
 800.482.8292

18

Welcome to
Mid-Cumberland Human Resource Agency
New Hire Orientation
Monday, November 5th, 2018

Agenda

9:00 – 09:30	AFLAC Info Session –
9:30 – 10:15	Agency Orientation – Leah Boyd
10:15 – 10:45	Harassment Video Info Session
10:45-11:15	Title VI Training Video

Employee Name (Please Print): Diona Brooks

Employee Signature: *Diona Brooks*

Employee Program/County: TIME I / McMinn County

Title VI Video

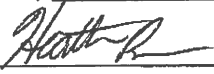
Employee Signature: *Diona C. Brooks*

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- | | |
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Employee Name (Please Print): HEATHER BROWN

Employee Signature: 

Employee Program/County: Title 1 / BRADLEY

Title VI Video

Employee Signature: 

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Employee Name (Please Print): Casey Eschette

Employee Signature: 

Employee Program/County: Southeast Admin Pool

Title VI Video

Employee Signature: 

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Employee Name (Please Print): NATHANIEL GATES

Employee Signature: *Nathaniel Gates*

Employee Program/County: ADULT SPECIALIST

Title VI Video

Employee Signature: *Nathaniel Gates*

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Employee Name (Please Print): Angala Hawn

Employee Signature: 

Employee Program/County: W/OA Title I McMinn County

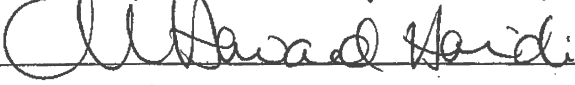
Title VI Video

Employee Signature: 

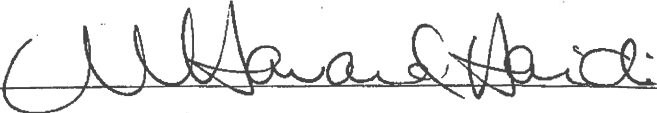
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Employee Name (Please Print): Michelle Howard-Hamidi
Employee Signature: 
Employee Program/County: Hamilton

Title VI Video

Employee Signature: 

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Employee Name (Please Print): Sherlane F Paris
Employee Signature: *Sherlane Paris*
Employee Program/County: Hamilton

Title VI Video


Employee Signature: *Sherlane Paris*

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Employee Name (Please Print): Wendy Stewart

Employee Signature: 

Employee Program/County: Bradley Polk - A, DW, & Y

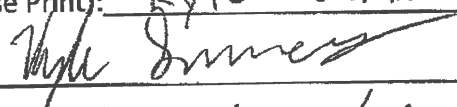
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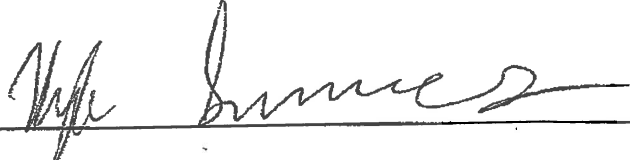
Employee Signature: 

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Employee Name (Please Print): Kyle Summers
Employee Signature: 
Employee Program/County: DW/Adult / Marion

Title VI Video
Employee Signature: 

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Employee Name (Please Print): William Summers

Employee Signature: William Summers

Employee Program/County: Youth / Marion

Title VI Video

Employee Signature: William Summers

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Employee Name (Please Print): Cheryl Thieman

Employee Signature: Cheryl Thieman

Employee Program/County: WIOA/Resource Room/McMinn County

Title VI Video

Employee Signature: Cheryl Thieman

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Employee Name (Please Print): Justin B. Washington

Employee Signature: J. B. Washington

Employee Program/County: Adult / Dislocated Worker Hamilton

Title VI Video
Employee Signature: J. B. Washington

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Employee Name (Please Print): Ilesha Watson
Employee Signature: Ilesha Watson
Employee Program/County: Hamilton Adult

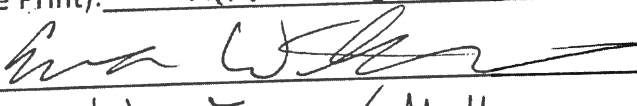
Title VI Video
Employee Signature: Ilesha Watson

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Employee Name (Please Print): Evan Williams

Employee Signature: 

Employee Program/County: Work Force / McMinn

Title VI Video

Employee Signature: 

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Employee Name (Please Print): Yolanda York

Employee Signature: Yolanda York

Employee Program/County: WIOA / RHEA

Title VI Video

Employee Signature: Yolanda York

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Employee Name (Please Print): Dan Zimmerman
Employee Signature: Dan Zimmerman
Employee Program/County: Hamilton

Title VI Video
Employee Signature: Dan Zimmerman

