



Northern Middle Tennessee  
Workforce Board Inc.

# LOCAL WORKFORCE PLAN

Program Years 2020-2022

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**Northern Middle Tennessee**

**Local Workforce Development Board**

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American**Job**Center<sup>®</sup>  
TENNESSEE

June 29, 2020

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## Signature Page

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SUBJECT: Northern Middle Tennessee Local Workforce Development Board, Local Plan

FROM: Honorable Anthony Holt, Sumner County Mayor  
Chief Local Elected Official, NMTLWDB

Mr. John Zobl, Chairman  
Northern Middle TN Local Workforce Development Board

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The attached WIOA Local Plan represents the Northern Middle Tennessee Local Workforce Development Board's concurrence as part of a thirteen county region to maximize resources available under the Workforce Innovation and Opportunity Act and to coordinate these resources within the region.

We certify that we will operate in accordance with this plan and applicable federal and state laws, as well as regulations.

  
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Anthony Holt, Sumner County Mayor  
Chief Local Elected Official, NMTLWDB

6/29/2020  
\_\_\_\_\_  
Date

  
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John Zobl, Chairman  
Northern Middle TN Local Workforce Development Board

6/29/2020  
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Date

**EXECUTIVE SUMMARY**  
**NORTHERN MIDDLE TENNESSEE LOCAL WORKFORCE DEVELOPMENT BOARD**  
**2020-2022 WIOA PLAN**

The Northern Middle Workforce Area is (NMWA) comprised of thirteen counties and two metropolitan statistical areas in middle Tennessee and serves as the economic engine of the State with over one-third of Tennessee’s workforce. The Northern Middle Tennessee Local Workforce Development Board (NMTWB) delivers integrated workforce services through four comprehensive, eight affiliate and two specialized American Job Centers. All centers have been certified as well as the mobile Career Coach.

<b>Fast Facts</b>	
Population	2,032,524
Workforce	1,050,465
Unemployed	155,946
Unemployment Rate	14.6%

The services are delivered under the guidance of the twenty-three member NMTWB, led by businessman, Chairman John Zobl. Sumner County Mayor, Anthony Holt, serves as Chief Local Elected Official and represents the Local Elected Officials from Cheatham, Davidson, Dickson, Houston, Humphreys, Montgomery, Robertson, Rutherford, Stewart, Sumner, Trousdale, Williamson, and Wilson Counties.

The Board, in partnership with Local Elected Officials, plans and oversees the local workforce system. Local plans are created and updated annually to be submitted for the Governor’s approval. The local Board selected Mid-Cumberland Human Resources Agency, through a competitive process, as the “One-Stop” Operator (OSO) and Career Service Provider (CSP). The Board is also responsible for approving

<b>Mission</b>	<i>To help job seekers access employment, education, training and resources to succeed in the labor market and to match employers with the skilled workers needed to compete in the global economy.</i>
<b>Vision</b>	<i>To provide customers with innovative workforce solutions which promote economic growth and increases the competitive position of the region.</i>
<b>Values</b>	<i>To provide visionary leadership, have valued employees, provide quality work and services, focus on customer satisfaction and rely on continuous improvement.</i>

providers of training services, monitoring system performance against established performance measures, negotiating local performance measures and distributing labor market information. The Board also leverages public and private resources to meet business needs and promote economic growth.

Northern Middle’s economy was strong prior to the COVID-19 pandemic. The virus’s impact on business and industry was substantial with over 37% of the unemployment insurance claims coming from Northern Middle. The area’s unemployment rate skyrocketed from 2.6% to 14.8%. Efforts are already underway to focus on rapid response and transitional skills. Dislocated Workers are being employed in recovery efforts through the National Emergency Grant and transitional funding.

Sector strategies are deployed in six key industries that align with the Area's growth occupations.

- \* Healthcare
- \* Information Technology
- \* Construction
- \* Advanced Manufacturing
- \* Transportation and Logistics
- \* Educational Services

The Board has leveraged its resources to provide training opportunities to over 3,000 individuals in the targeted sectors.

The Northern Middle Board has established four guiding principles to steer the strategic direction of the Board and govern operations. Focused on job creation through economic development, the Board prioritizes fiscal responsibility and effective delivery of workforce services to maximize the competitive position of the businesses in the NMWA.

Northern Middle Workforce Board  
Strategic Priorities

- ▶ Connect people with career opportunities better than they could on their own
- ▶ Manage board funds to support lifelong career pathways
- ▶ Train workforce to fill employer requirements
- ▶ Improve the efficiency and effectiveness of our training processes

The Workforce Innovation and Opportunity Act (WIOA) of 2014 requires in *Section 107* that local Boards develop plans that meet the needs of the Governor. Northern Middle's plan supports the Regional Plan and aligns its strategies and actions to Tennessee's Combined Plan. Northern Middle has conducted an analysis of economic conditions and convened local stakeholders to include employers to develop strategies to meet employment needs within the area and region. The Board has focused on career pathways in the sectors mentioned above to meet those needs and identify best practices and strategies to increase efficiencies. The Board uses technology to accomplish outreach and accessibility for all customers. NMTWB leverages educational providers and has developed a budget to support its strategies. The Board has accomplished this through the local plan and its contribution to the Regional plan, while transforming the thirteen county area into the highest growth region in Tennessee. The Northern Middle Board's actions, strategies, and plans have aligned with the states workforce vision ***of increasing the competitive position of Tennessee business through the development of a highly skilled workforce.***

## **OPERATING SYSTEMS AND STRATEGIES**

### **A. Description of the one-stop delivery system in the Northern Middle area, including the roles and resource contributions of the one-stop partners.**

The Northern Middle Tennessee Workforce Area (NMWA) encompasses a dynamic economic region that meets the growing needs of employers and job seekers due in part to a workforce system that builds on strong partner relationships and a solid community reputation. With a focus on pipeline development, the area is a leader in apprenticeship development and aligning training with a sector strategy focus. The Northern Middle Tennessee Workforce Board sets a high performance bar and provides resources and support to ensure the success of the One Stop Operator and the Career Service Provider, as well as the success of other vital partners. The American Job Center is visible and engaged in each of the thirteen counties in the service area, home to a population of just over two million people. The area's population has increased by 9.5% over the last five years, and jobs have grown by 15.4% over the same time, far exceeding the national jobs growth rate by 7.8%. The 23-member Northern Middle Tennessee Workforce Board (NMTWB), led by community and business leaders, is knowledgeable and engaged in strategic decision-making as it provides guidance and direction to deliver the Workforce Innovation and Opportunity Act (WIOA) activities across the area. The well-established network of partners and delivery points that support a seamless delivery of workforce services to job seekers and businesses is the core strength of the region's success.

Workforce services, delivered through Welcome, Business and Career Service functional teams, are offered by a network of partners, operating both in the American Job Centers and at community access points in each county. The partnerships are coordinated and defined through a Memorandum of Understanding and Infrastructure Funding Agreement. Blended partner services include the Workforce Innovation and Opportunity Act's Title I Workforce Services, Title II Adult Education, Title III Wagner Peyser, Title IV Vocational Rehabilitation, as well as Temporary Assistance for Needy Families, Senior Community Services Employment Program, RESEA, Local Veterans Employment Representatives, Disabled Veterans Outreach Program, Job Corps, Ticket to Work, National Council On Aging, Employment Network, Career and Technical Education, Tennessee Reconnect as well as other workforce partners. The Board encourages and supports innovative program delivery and has actively sought pilot programs and strategies as community needs dictate. In addition, Board staff is adept at bringing a multitude of stakeholders together to facilitate alternative service delivery models such as the pending certification of the Napier Sudekum Envision Center as a specialized American Job Center in the heart of Nashville's public housing development. At the direction of the NMTWDB, blending funding to meet employer needs often occurs when local government, Economic Development Partners, and AJC Partners meet to define who best can address a workforce deficiency through innovative approaches such as the establishment of an electrical apprenticeship in partnership with Empower Electric, TCAT Nashville and the American Job Center system.

#### ***A.1 Northern Middle career services and other program services provided, including the location at which services will be accessible and type of center.***

The NMTWB delivers a full array of workforce services in a region that includes small rural communities, suburban areas, and large metropolitan counties. The area served includes a varied socio-economic base, many cultures, and a wide range of education levels. Labor Market Information provides insight into the diverse types and sizes of business and industry represented throughout the area. There is no "one size fits all" approach to serving employers or job seekers, and the NMTWB is invested in remaining flexible to provide a high level of service throughout the 13 counties. One visible way that commitment is

aptly illustrated is through the provision of an American Job Center in each county, with four Comprehensive, eight Affiliate, and two Specialized and certified American Job Centers (AJCs) as well as a mobile Career Coach staffed and available to meet community needs. The board continues to evaluate additional locations and access points, particularly in the densely populated Davidson County. A chart of American Job Center locations is below.

<b>Cheatham County</b> (Affiliate) 384 South Main Street Ashland City, TN	<b>Davidson County</b> (Comprehensive) 665 Mainstream Drive Nashville, TN	<b>Dickson County</b> (Affiliate) 250 Beasley Drive Dickson, TN
<b>Houston County</b> (Affiliate) 155 Front Street Erin, TN	<b>Humphreys County</b> (Affiliate) 711 Holly Lane Waverly, TN	<b>Montgomery County</b> (Comprehensive) 523 Madison Street Clarksville, TN
<b>Fort Campbell</b> (Specialized) 101 Ringgold Rd Clarksville, TN	<b>Robertson County</b> (Affiliate) 299 10th Ave. East Springfield, TN	<b>Rutherford County</b> (Comprehensive) 1313 Old Fort Parkway Murfreesboro, TN
<b>Stewart County</b> (Affiliate) 1356 Donelson Parkway Dover, TN	<b>Sumner County</b> <b>(Comprehensive)</b> 1598 Greenlea Blvd. Gallatin, TN	<b>Trousdale County</b> (Specialized) 294 E. McMurry Blvd. Hartsville, TN
<b>Williamson County</b> (Affiliate) 118 Seaboard Lane Franklin, TN	<b>Wilson County</b> (Affiliate) 415 Tennessee Blvd. Lebanon, TN	

Career services including job search and job-readiness workshops, connection to training providers, and follow up services ensure individual success. The AJC partners extend the training and support services to assist those with barriers to gain the education and training needed to find meaningful employment with a self-sustaining wage in a global economy. In addition to on-site services in the AJC, job seekers can connect through technology and referral to partner and community resources. The availability of the mobile Career Coach to serve remote areas provides a valuable service.

***A.2 Explanation of Northern Middle's one-stop centers ability to provide all required or relatable services of customers based on the customers' respective need(s) and a customer centered design.***

The NMTWB ensures that all workforce services are delivered through a network of its certified American Job Centers, which are operated under the coordination of the One Stop Operator (OSO) through a signed Memorandum of Understanding (MOU) with all partners. The OSO monitors partner engagement and referrals and reports partner productivity to the Board quarterly. The OSO dashboard includes data centered on enrollment and services provided for each location. This consolidated overview ensures that all services are available to job seekers and businesses throughout the LWDA. The OSO, as well as an executive team of partners, reviews each center and assesses its capability for service delivery to include blended services, and ensures accessibility for persons with disabilities. The centers have a staff composed of Welcome, Business Service and Career Service functional teams to align expertise and resources to meet the needs of the individual or employer. A focus on co-enrollment and a working knowledge of partner services and programs leads to a team approach to providing resources to facilitate



customer success. These coordinated efforts avoid duplication and extend the resource knowledge base of both partner staff and customers.

***A.3 Information regarding Northern Middle's one-stop operator and description of methods for coordinated service delivery between operator and partners.***

The OSO is responsible for oversight and coordination for the delivery of services in the American Job Centers throughout the 13 county region, serving special populations as well as businesses. The OSO ensures that all partners leverage resources, avoid duplication, and prioritize services and events through training and communication with all partner staff. The OSO is visible in all locations and communicates regularly. The OSO monitors customer service activity and recognizes best practices to share with all locations. The OSO can intervene in daily operations to improve the customer experience. Weekly team meetings in Comprehensive centers ensures that resources are in place to continue service delivery. The meetings focus on high priority events for the week, especially hiring events or events planned as part of Rapid Response services to dislocated workers. The OSO dashboard, along with weekly goal monitoring, ensures that the resources to accomplish goals are provided. The OSO communicates with Board staff monthly and with Board members quarterly.

In December of 2018, the NMTWB announced the plan to competitively procure their OSO. In order to avoid any real or perceived conflict of interest, the Board elected to procure a third party, Thomas P. Miller and Associates, to handle the OSO solicitation. Thomas P. Miller then crafted the RFP, with guidance from the Board Staff and strategic direction from the Board. The procurement was publicly posted and sent to numerous organizations on the bidder's list. A formal protocol for question and answers was created to disseminate information to all bidders. Four agencies responded to the proposal. Each proposal was evaluated and vetted by Thomas P Miller and Associates. The proposals and evaluations were then presented to the NMTWB Operations Committee for review. The Committee reported to the full Board in May 2019 and recommended Mid Cumberland Human Resource Agency as the OSO. The full Board voted unanimously to award the OSO contract to MCHRA to begin July 2019.

The One Stop Operator is to coordinate the functions of the multiple American Job Center Partners and service providers throughout the Northern Middle Tennessee workforce area to assure functional alignment of services and management of all operational resources. The scope of work for the OSO includes but is not limited to: OSO will oversee AJC centers and the delivery of services, evaluate performance, evaluate customer experience, coordinate partner programs, act as a liaison to the Board, implement state systems, conduct marketing of the system, write a business plan as well as manage fiscal responsibility for the system. The OSO will conduct quality reviews of partner and service provider activities. The OSO will facilitate the Welcome Function throughout the AJC system including hiring shared Welcome Function staff at the Comprehensive centers located in Davidson, Montgomery, Rutherford and Sumner counties.

***A.4 Description of the one-stop operator's role and responsibility for coordinating referrals among required partners in Northern Middle.***

Serving as the OSO, MCHRA coordinates partner programs throughout the AJC network with the first line of service beginning with the Welcome Team. Members of the Welcome Team triage customers upon entry to the AJC to assess customer needs and make immediate referrals to the benefiting partner(s). Within the system, partner-to-partner referrals are encourage to meet customer needs and leverage funding. The preferred method of referral is a "warm handoff", where staff members introduce the customer to the benefiting partner. When a warm handoff is not available, the OSO has created a paper referral, which lists applicable information for the customer. Partner services and the referral processes are described in the MOU as agreed upon by the AJC partners. With weekly team meetings and quarterly

trainings, the OSO monitors referrals and “warm handoffs” between partner programs, specifically with targeted populations. The OSO tracks referrals through the AJC referral form and via JOBS4TN reports, and gives that information to the Board on a quarterly basis.

Referrals are encouraged between all partners programs including, but not limited to Title I-Adult, Youth, Dislocated Worker, Adult Education, Wagner Peyser, SNAP, Vocational Rehabilitation, Job Corps, TANF, TAA, and RESEA.

## **B. Description of Northern Middle’s use of technology in the one-stop delivery system.**

Now more than ever, technology is an essential component in an effective workforce delivery structure. The COVID-19 Pandemic has escalated the need for virtual services to allow for a seamless delivery of services by all partner agencies. Highlighted through Jobs4TN.gov, the Virtual One Stop (VOS) establishes a platform for digital communications. The needs presented by the pandemic have offered an opportunity to evaluate the expansion of online training platforms to provide basic career services. For example, through a regional partnership with the West Kentucky Workforce Board, a pilot project utilizing Career Edge for workshops and other career services will be in utilized at Campbell Strong this summer. Opportunities to create online WIOA registration, host virtual Adult Education classes, and to provide “virtual” Apprenticeship Signing Days, may expand the service delivery model far beyond the timeframe of the pandemic. This shift to the increased use of technology will appeal to the younger customer base and to employers.

### ***B.1 Description of Northern Middle’s workforce centers implementation and transition to an integrated, technology-enabled intake and case management information system for programs carried out under WIOA.***

All customers who enter the Northern Middle AJC system are greeted via the Welcome Function Team and self-register using the VOS (Virtual One Stop) Greeter via an I-pad kiosk. This allows the OSO to monitor activity by location. An added benefit of this process is that customers are exposed to the list of available services as they register, which can promote a dialogue about additional options and services. The registration improves the customer experience as wait times are monitored and shared among partner staff. The process also allows for easier documentation of the customer entry process.

VOS greeter and activity reports are turned in to the Board on a monthly basis and analyzed to ensure that the balanced assets are there to serve the needs of the customers. These can fluctuate as conditions change. Due to the COVID 19 response, even though person-to-person activity was restricted, telephonic activity was being entered into the VOS system to track county workload and response times.

In light of COVID-19, all intake forms were transitioned to fillable PDFs to allow for ease of completion and electronic delivery. Career Advisors are equipped with cell phones and laptops, which allows for virtual enrollment through zoom, FaceTime and other technological methods. No longer is it mandated that a potential customer physical enter an American Job Center in order to enroll into WIOA; thus promoting efficiency and effectiveness.

### ***B.2 The Northern Middle will facilitate access to services provided through the one-stop delivery system, including in remote areas, through the use of technology and other means.***

The Northern Middle Board has physical offices in all 13 counties, and has specialized centers focusing on those re-entering the workforce from incarceration and those transitioning from the military at Fort Campbell. This multi-county coverage ensures that all residents have easy access to services without the



hardship of having to drive excessively to find partner services. This is especially beneficial in rural counties such as Stewart, Houston (a distressed county), Trousdale and Humphreys where there is limited availability of high-speed internet. In those counties in particular, customers rely on the AJC Computer Resource Center. The use of the Mobile Career Coach supplements the AJC locations by providing technology where it most impacts constituents. An excellent example of prime use of this resource was illustrated when the Mobile Career Coach was deployed to Middle Tennessee areas, which suffered a direct hit, by tornadoes in several counties. Without power and internet, the customers looking for workforce assistance were served the next day and for the following two weeks through placement of the coaches near Emergency Management shelters. The Board will continue to work with community partners to co-locate in order to meet local needs. The Board also supports local government efforts to expand internet accessibility.

**C. Northern Middle will support the strategy identified in the Tennessee Combined State Plan and work with entities carrying out core programs.**

The Northern Middle Workforce System has integrated its services to allow all core and non-core partners to work collaboratively and seamlessly in the delivery of services under multiple workforce programs. Aligning with the Job Based Camps, the 13-county system strives for robust implementation in its business strategy, job seeker universal access, streamlined business teams, linked referrals and assessments and targeted training. Functionally aligned staff through certified centers simplifies customer service delivery. The Board's mantra of leveraging resources, use of technology to deliver services, and reducing duplication strengthens the Board's workforce economic footprint. With a signed MOU and IFA the Board has close integration with Wagner-Peyser, Title I Adult, Title I Dislocated Worker, and Title I Youth services, as well as 15 other partners within the AJC network.

In an effort to expand services to include more participants, the Board voted at its June 2020 meeting to serve both in school and out of school youth, and established a more complete list of community partners. The Board has also established an important partnership with Project Return to provide more intense services to inmates nearing release dates to assist with training and job placement. With an eye toward seeking partnerships that are mutually beneficial, the Board continues to work with business and industry to establish workplace-learning opportunities, on the job training, or apprenticeships in high-demand occupations.

***C.1 Northern Middle will expand access to employment, training, education and supportive services for eligible individuals, particularly eligible individuals with barriers to employment.***

During the past year, the Northern Middle Board has expanded their outreach of delivering world-class workforce services by opening a Specialized American Job Center in Trousdale County. This certified center has two primary missions; first- to offer direct services to offenders being released from the state prison in Trousdale County being run by Core Civic; and two-to offer workforce services to job seekers and employers in a rural county thus boosting economic growth within the region.

The Board's goal of expanding access to the AJC network is multipronged. With an effort to increase focus on adult education, the board has implemented an incentive policy for customers to complete their high school diploma and encourages them to pursue and complete post-secondary training opportunities. Transportation is a serious barrier to employment in the rural areas of NM. Transportation assistance can be accessed through WIOA support services for all customers through co-enrollment with Wagner Peyser or other partners. To expand access to TANF customers, co-enrollment in youth work experience is encouraged to enhance work opportunities. Specifically, the TANF unpaid, community service requirement may be leveraged into a paid work experience under the WIOA Youth program. Expansion

of services for individuals with disabilities is a priority in Northern Middle and is highlighted by the upcoming Specialized AJC partnership with Vocational Rehabilitation at the Envision Center Napier in Nashville. The Ticket to Work program operates throughout the NMWA and is advertised via the SSI and SSDI websites as a program to lead to increased education and self-sufficiency. Technology, including broadband access also presents a serious barrier to employment for all customers. The Board is planning a pilot project to provide support services to include access to chrome books and hot spots to eligible customers.

***C.2 Northern Middle will facilitate the development of career pathways and co-enrollment, as appropriate, in core programs.***

NM AJC partners are highly encouraged to leverage resources, and avoid duplication of effort by co-enrolling individuals beginning a new pathway to in-demand employment. Individual partners utilize career interest inventories to align their desires and likes to develop a career pathway to in-demand work requirements. Once this is established the partner programs refer individuals to other, programs to see what assistance the individual can receive that eliminates a barrier to progress down their career pathway. This referral process and co-enrollment is laid out in the MOU and monitored by the OSO as well as the Board on a quarterly basis. SNAP, RESEA, Adult Education, VR, TAA and TANF co-enroll many of their customer base with the Title I program.

Labor Market information has identified Healthcare, Information Technology, Construction, Transportation and Logistics, Advanced Manufacturing and Education as six industry sectors that are growing in the NMWA. The Board focuses its effort and funding (see ETPL report) as well as early intervention with local K-12 to develop pathways to occupations within these industry fields. AJC partners are actively involved with the P-16 Council and assists with career fairs for 8<sup>th</sup> graders at Volunteer State for Sumner, Robertson and Trousdale County school systems. It also focuses its involvement with the Nashville Davidson County 8<sup>th</sup> grade career fair as well as with the Governor's Investment in Vocational Education (GIVE) programs developing career exploration initiatives with rural counties such as Stewart and Houston. Adult Education instructors work with student coordinators to complete the goal sheet for determining a starting point for career pathways while in AE classes. Interest inventories align the in-demand career with the individual's academic program and aligns academic instruction to real world occupations. Thus preparing AE students that upon receiving their HiSet, they are then poised to begin a new career with higher wages. Often times students in Adult Education can align their career interest with an Integrated Education and Training (IET) program. The Pathways to Prosperity program is an avenue to effectuate Governor Lee's focus on STEM skills. The NMTWB is engaged in building a system of career pathways so that youth can complete high school as well as receive a recognized credential. Specifically in Montgomery, Houston and Stewart Counties the Board through the GIVE grant is creating an Industrial Readiness Training Credential for youth to receive in advanced and recognized by businesses such as Bridgestone, Hankook Tire and LG. Through the Youth Career Exploration Grant, the NMTWB in partnership with Rutherford Works and the Rutherford County School Stem created career pathways in target sectors. [Click here for an example.](#)

***C.3 Northern Middle will improve access to activities leading to a recognized post-secondary credential.***

The Jobs4TN.gov website provides a plethora of labor market trends and is bookmarked at all resource centers. The MCHRA Title I staff during a customer's career planning phase ensure that not only does the career pathway show a Bright Outlook but also ends with a credential that through higher education is portable and recognized by business and industry. The OSO provides staff for the Welcome function and resource rooms with a primary purpose to ensure that job seekers receive highly visible labor market

information including accurate local and regional data that aligns with self-sustaining careers that include industry-recognized certifications. Title I and Title III staff encourage customers to not only complete post-secondary training but also complete industry certification. An example is the TCAT CNC and Industrial Maintenance courses, where the NIMS certification (National Institute for Metallurgy Skills) is also required for completion. The Board policy will only authorize funding for training that does produce a certification. The Northern Middle Board has goals and objectives for certification completions given to its CSP, MCHRA, and goals and objectives are measured and reported quarterly via performance metrics.

**D. Northern Middle’s coordination strategies with state, regional and local partners to enhance services and avoid duplication activities.**

Workforce development is regional in Middle Tennessee. Numerous labor market studies prove that the labor shed not only crosses county and city borders but also state lines as well as local workforce areas. The Regional Planning Council and its economic development partners as well as chambers of commerce have developed a close working relationship that allows the flow of resources available to move toward the needs of business and industry. An example of this would be the Nissan plant and it’s Tier 1, 2, 3 suppliers. The American Job Center system opened its doors for pretesting applicants as well as a physical presence in the Rutherford County AJC that still exists today. The Local areas of now Southern Middle, Upper Cumberland and Northern Middle all conducted job fairs and information fairs as well as employee referrals and personnel assets to ensure that the thousands of needed employees would be available for Nissan. The Regional Planning Council and its partners guided that strategy and has since been the model for other workforce activities with companies such as Amazon and LG.

***D.1 Northern Middle coordination strategies to include Adult, Dislocated Worker and Youth employment and training activities under WIOA Title I.***

MCHRA is the Career Service Provider for NMTLWDA for Title I Adult, Dislocated Worker, and Youth services. The Northern Middle Board reviews goals and objectives quarterly and through monitoring and corrective action at monthly coordination meetings, ensuring that the CSP enhances best practices and eliminates barriers. MCHRA Career Services Staff are supervised by a Career Manager. In conjunction with the OSO who operates as a functional supervisor, both managers ensure that Title I staff are meeting performance standards as well as WIOA law and policies of both MCHRA and the Northern Middle Board. Each Career Service Staff also has an operations manual and through VOS, customers receive the same support no matter if they are being served in a

Northern Middle Enrollments by County						
01/01/2020 - 03/31/2020						
Goal	AD & DW		YOUTH		Total	
	1524	%	519	%	2043	%
Cheatham	9	0.6%	7	1.3%	16	0.8%
Davidson	57	3.7%	22	4.2%	79	3.9%
Dickson	15	1.0%	7	1.3%	22	1.1%
Houston	10	0.7%	0	0.0%	10	0.5%
Humphreys	12	0.8%	4	0.8%	16	0.8%
Montgomery	35	2.3%	13	2.5%	48	2.3%
Robertson	13	0.9%	0	0.0%	13	0.6%
Rutherford	35	2.3%	13	2.5%	48	2.3%
Stewart	10	0.7%	0	0.0%	10	0.5%
Sumner	27	1.8%	15	2.9%	42	2.1%
Trousdale	0	0.0%	2	0.4%	2	0.1%
Williamson	11	0.7%	2	0.4%	13	0.6%
Wilson	8	0.5%	9	1.7%	17	0.8%
Ft. Campbell	214	14.0%	NA	0.0%	214	10.5%
<b>Total</b>	<b>456</b>	<b>29.9%</b>	<b>94</b>	<b>18.1%</b>	<b>550</b>	<b>26.9%</b>

Comprehensive, Affiliate, or Specialized American Job Center. Youth are receiving services at all centers through specialized case management staff who only work with youth customers due to eligibility issues, requirements for 14 youth element support, and generational differences. The Career Service Manager balances programmatic decisions, monetary determinations and support service determinations across all 13 counties to ensure that employment and training activities are available and equally disseminated to customers. A single CSP allows the Board to quickly assess and change operations if provider activities are not meeting standards.

***D.2 Northern Middle coordination strategies to include Adult Education and Literacy activities under WIOA Title II.***

Adult Education and Literacy activities are thoroughly entwined with the American Job Center System throughout the NMWA where but Title II activities are actually delivered in day and night classes physically located in ten of its AJCs. Additionally, HiSet testing is also conducted in the centers, which increased the number of tests and diplomas awarded due to the convenience of the locations. Having the Title II, staff and activities delivered in the center provide a direct and efficient path for co-enrollment, soft hand off, and has proven very effective in leveraging other resources to ease barriers of customers requiring Title II services. The co-enrollment requirements and location with the AJCs focuses Title II delivery on workforce preparation. All of the AE classroom subjects include workforce contextualized learning experiences that focus within the lens of work. Title II training is critical to the development of the local and regional workforce and they are tied to the needs of the employers. Thus, under direction of the Board, Title II services are being delivered at businesses such as Tyson Foods, Nissan and coordination is ongoing to deliver services at Amazon. This strategy creates a direct and positive impact to area employers and increases skill sets of employees, which is a win-win for all.

The consortium of adult education and literacy partners in the NMWA consists of the Nashville Adult Literacy Council, Volunteer State Community College, Nashville State Community College, Workforce Essentials and the local county school systems. The organizations provide a seamless blanket of educational services across the area including instruction in literacy and adult education, HiSet testing, Integrated English Literacy/Civics (IELC) and English as a Second Language (ESL). Adult Education serves a labor force pipeline for business and industry. The Board has implemented a new incentive policy to encourage and reward Adult Education students to complete their HiSet and enroll in post-secondary training. AJC Business Services teams are encourage to utilize Integrated Training and Education (IET) to address industry demands. Additionally, Workforce Essentials pulls the partners together as the lead in the consortium to hire instructors, align with the AJC system, and promote co-enrollments with other partners such as SNAP and TANF to ensure funding is leveraged to provide opportunity to all AE students. The NMTWB also prioritizes the development of partnerships with local correctional facilities to offer classes to offenders while they are incarcerated. Adult Education classes are being offered in most local jails in the NMWA. The Board is partnering with Project Return to serve transitioning inmates nearing their release date from federal and state correctional facility and encourages those without a high school diploma to attend classes.

The Northern Middle Board will coordinate activities with education and training providers in the local area, including providers of workforce investment activities, adult education and literacy activities, providers of career and technical education defined by the Carl Perkins Act, and local agencies coordinating Title I activities. The Board will also review applications to provide adult education and literacy and make recommendations to eligible agencies to promote alignment and ensure that adult education aligns with the state plan. Currently Adult Education applications within the state are reviewed

and graded out by third parties to avoid any conflicts of interest within the region. The Board will require from an eligible agency to describe their cooperative agreements, how they will align services, how they will meet adjusted levels of performance, how they will fulfill one-stop partner responsibilities per section 121 of WIOA, and how they will meet the needs of eligible individuals.

***D.3 Northern Middle coordination strategies to include Wagner-Peyser Act (29 U.S.C. 49 et seq.) services under WIOA Title III.***

The four Comprehensive American Job Centers in Davidson, Montgomery, Rutherford and Sumner counties have a complete array of merit staff that deliver Title III Employment Services. Through the MOU, those staff are tasked to provide labor exchange services in the NMWA. Title III staff have been assigned to service Affiliate centers to provide seamless service across the area. The NMTWB plan aligns with the State plan (p. 102) by assuring the following: 1. Title III staff are physically located in all four Comprehensive Centers. 2. State agency merit based employees provide Wagner Peyser labor exchange activities. 3. Title III and Title I staff coordinate with Vocational Rehabilitation on co-enrollments. 4. Wagner Peyser staff works with the Migrant and Seasonal Farmworkers programs. Additionally, the Title III staff deliver scheduled services remotely as needed throughout the area. Title III staff serve as lead for the mobile Career Coach and have most recently deployed for over two weeks in March after a severe tornado outbreak created a 50-mile path of destruction in the NMWA. The Title III staff leads coordinate labor exchange activities to include: organizing job fairs, supporting employers through job postings and referrals via the Jobs4TN system, and serving on the Business Services Team to support AJC employer activities. The NM Regional Director, a Title III employee, also serves on the Board and is on the special populations committee to advise the Board of Wagner-Peyser services. Under the direction of the Commissioner of the TDLWD, most Title III staff have been reassigned to provide Unemployment Insurance services during the COVID-19 pandemic. The Wagner Peyser staff will continue to provide UI services until such time that the backlog of claims have been resolved and Tennesseans have been served. In light of COVID-19, some Title III staff have adapted and are providing virtual job fairs for employers and supporting the Tennessee Talent Exchange.

***D.4 Northern Middle coordination strategies with include Vocational Rehabilitation service activities under WIOA Title IV.***

Vocational Rehabilitation is critical asset in the AJC system especially assisting those with significant barriers to employment in the NMWA. There is a VR regional representative on the Northern Middle Tennessee Workforce Board and VR staff are housed in five American Job Centers in Montgomery, Robertson, Davidson, Rutherford and Dickson counties. This presence provides direct feedback to the Board as well as direct partnership with the other core partners within the Northern Middle AJC system. Partners can easily leverage services to avoid duplication as well as speeding services to those with disabilities. The referral process for VR customers is outlined in the signed MOU and VR clients from Affiliate and Specialized sites can make appointments through the referral system. Having the VR counselors in the AJC aligns the VR state strategic priority of “Build innovative and effective service delivery models to support business and individuals with disabilities in driving achievement of their employment goals”. VR counselors within the AJC system can also reach out to additional VR assistance through their internal VR network, DVOPs, Ticket to Work and in the NM Employment Network that bring additional resources to those with disabilities.

***D.5 Northern Middle coordination strategies to include relevant secondary and post-secondary education programs and activities with education and workforce investment activities.***



The NMTWB has members representing Adult Education and the Tennessee Board of Regents, which gives direct connection to educational programs on the Board. Strategically positioned, four of the American Job Centers, Dickson, Humphreys, Wilson and Rutherford are housed on a TBR campus. This is advantageous for Adult Education students, including TANF customers that attend classes at the AJC and are exposed to the higher education environment. This close cooperation and physical sharing of space and resources ensures that case managers, business and industry, and educational programs are all combined so that service delivery is seamless and focused on the needs of employers including opportunities for Integrated Education and Training opportunities for Adult Education students. This close cooperation between the AJC and TBR in the NMWA aligns perfectly with the state's strategic goals of developing a 'Clear Connection to Current Employers' as well as its second goal of developing a 'Clear Pipeline to Development Infrastructure'.

The Workforce Board fully supports Strengthening Career and Technical Education (CTE) for the 21<sup>st</sup> Century and supports CTE instruction throughout the NMWA. The NMTWB previously focused only on out-of-school youth, recently approved in-school services. The NM Career Service Provider has specifically structured and staffed its business model with a separate youth director with dedicated youth staff to support increasing alignment between secondary CTE Instructors and career pathways. MCHRA has established funding under WIOA to eliminate barriers for youth pursuing in demand careers and setting up a pathway for success to align those careers with the six industry sectors supported by the Board. The youth counselors are located in the AJC and frequent high schools and work closely with CTE instructors to identify students that may need additional help to align them for success. In addition, Career Coaches are encouraged to develop relationships with post-secondary institutions and support services such as Tennessee Promise and Reconnect. Staff were recently trained to be Reconnect Ambassadors to support post-secondary training.

The Board is involved with numerous GIVE grants and is the lead agency for the Bridge to Work GIVE grant that encompasses Montgomery, Houston (distressed) and Stewart County. This grant aligns career pathways for high school juniors and seniors as well as other CTE students and career exploration for 8<sup>th</sup> graders to gain the skills needed in Advanced Manufacturing. The higher education partners are the Clarksville TCAT, Nashville State Community College and Austin Peay University.

***D.6 Northern Middle will support the strategy identified in the State Plan and work with the entities carrying out core programs and other workforce development programs, including programs of study authorized under the Strengthening Career and Technical Education for the 21st Century (Perkins V) Act (20 U.S.C. 2301 et seq.) to support service alignment.***

The Northern Middle Board is highly involved with Career and Technical Education throughout the 13 County region. The Board has chosen to leverage its resources to focus its efforts to create a talent pipeline through K-12 CTE education. The Board's vision is to leverage resources, empower students, build career awareness, provide a support network, and use data to obtain relevant student outcomes. From its quarterly interaction with connecting business to CTE instruction through the P-16 Council hosted by Volunteer State Community College, to its partnership in three GIVE grants covering the LWDA, the Board aligns with Perkins V to keep our economy strong. This is a long-standing relationship to include having Board staff over the past 5 years, participating in trips with CTE instructors to review best career pathways successfully implemented in Georgia, North Carolina and East TN. The Gestamp factory and the Volkswagen youth partnership in Chattanooga gave the Board many 'lessons learned' and a model to base the Bridge To Work GIVE grant that was successfully awarded to the Northern



Middle Board as the lead entity. The Northern Middle Board was involved from the ground up in developing the GIVE grants bringing almost \$3 million into the community aligning CTE with the six in demand industry sectors within the region.

BRIDGE to Work	TCAT Dickson - Northern Middle TN Workforce Board	\$ 987,699
Tennessee Central Cooperative Manufacturing WBL Program	TCAT Hartsville - Tennessee Central Economic Authority	\$ 994,995
GO TECH: Growing Opportunities with Technology	Volunteer State Community College - Greater Nashville Technology Council	\$1,000,000

The Bridge to Work program focuses its efforts on Advanced Manufacturing and includes the three county CTE programs of Houston, Stewart and Montgomery County. Especially important is the focus on Houston County since it is a distressed county within the Northern Middle LWDA.

***D.7 Northern Middle coordination of strategies with veterans and eligible spouses, to include priority of service and the use of available Jobs for Veterans State Grant (JVSG) staff.***

The JVSG staff are fully integrated throughout the Northern Middle LWDA. LVERs and DVOPS are physically located in each of the four Comprehensive American Job Centers in Montgomery, Sumner, Davidson and Rutherford counties. This distribution of staff allows complete coverage of services through appointments and travel across the region. The Northern Middle Board is also focusing its attention to service members and spouses with the Fort Campbell military base located within the LWDA. With 400 separating soldiers per month departing Fort Campbell and approximately 3,000 new spouses arriving each year to the area, the Northern Middle Board and TN Department of Labor has developed a strong working relationship with the on-post transition center. So much so that a permanent JVSG staff member is housed on the installation. The Tennessee DVOP/LVER gives briefings to every soldier being discharged from service on Fort Campbell, Kentucky on the nationwide AJC system and the opportunities and benefits that veterans may receive in civilian employment, training opportunities and job placement especially in the TN and KY region.

Under the leadership of the TDLWD, the Northern Middle Board partnered with its sister Western KY Workforce Board and was awarded a \$7M grant to assist transitioning soldiers and spouses find employment in in-demand civilian occupations. It is a one-of-a-kind nationwide best practice that is surpassing goals and objectives and provides direct employment opportunities throughout middle TN and western KY. The Campbell Strong Workforce Partnership (CSWP) has served over 1,200 soldiers and spouses with placement wages over \$20.00 per hour in the last sixteen months. A key player in this grant is the JVSG staff that are located next to the military base and their direct connection to other LVERs and DVOPs across the state. The JVSG staff refer discharging soldiers to other AJCs within the state for employment as well as discharging military personnel still in transition from other military installations. The LVER/DVOP staff housed at the CSWP is a key player in seamless services and full coverage of options to our veterans entering their second career.



***D.8 Northern Middle coordination of strategies with other services provided in the one-stop delivery system including but not limited to the programs outlined in WIOA Sec. 121.***

The American Job Center system delivers a myriad of specialized and free flowing services that are coordinated through the OSO and it's Welcome, Business Service and Career Service teams. It includes a network of Title I-IV partners and many other programs and resources. Program delivery is through four Comprehensive, eight Affiliate and two Specialized Centers. The NMWA also houses Ticket to Work, TANF, Employment Network, Job Corps, County Veteran representatives, HiSet Testing, Yates Nissan, TCAT classes, Trade Adjustment and Trade Readjustment Assistance, SCSEP, Youth CAN, Community Action Agency, and Tennessee Reconnect programs through a signed MOU and IFA. The two Specialized Centers focus on delivery to Reentry Programs in Trousdale County due to its proximity to the Core Civic prison system, and to soldiers and spouses from the Fort Campbell military base in Montgomery County. Customers are able to access any of these programs seamlessly through in-person, referral or virtual appointments no matter which AJC office they initially visit for assistance. From a business standpoint, employee workforce is a regional concept, but the Business Service teams maintain a single point of contact with the local AJC while supplying business needs through a commuter regional approach.

***D.9 Northern Middle will coordinate the provision of transportation and other appropriate support services.***


The Board and its Career Service Provider of Title I services (MCHRA) provides a full array of support services as outlined in the Support Services Policy attached in this local plan. The Board has taken an approach to cap the total cost of support services rather than capping specific services to eliminate a wide array of barriers to employment. Thus, as seen in the support services policy, a full array of services can be authorized by the career service provider from transportation, to childcare, to specialty clothing and equipment, to medical assistance, to books and testing certifications. Transportation however, remains the largest barrier to employment in the LWDA, which covers both urban and rural counties, and Nashville the largest city in TN. The majority of counties do not have a public transportation system with the exception of Montgomery and Davidson Counties. The lack of public transportation creates a challenge for some job seekers in rural communities to find a career pathway to a livable wage while others commuting into the Nashville area have to plan for additional traffic time. A limited bus and train system from Sumner and Wilson Counties exists but drop off and pick up points are few. The Mid Cumberland HRA van and transportation service is interlaced throughout the area, is by appointment in advance, and focuses on a specific customer base. Uber and Lyft are also available but due to its private business model is not a scheduled provider for most customer and business needs. Public taxi service is available in most counties, however in areas such as Trousdale and Houston they are limited in volume. With the growth of the region and especially Nashville, the Board has supported efforts to move forward with an expansion of the public transportation system for mass transit as well as some increases in expenditures for long and short range local and regional planning to expand roadways in high traffic areas. With some of the Boards business representatives being from the transportation sector, the Northern Middle members are keenly aware of transportation issues. The Board has hosted meetings from Economic Development as well as Workforce 360 roundtables. To ease the burden of transportation costs to job seekers the Board has authorized support services via gas card, mileage reimbursement, bus pass or van/taxi reimbursement depending on the traveling situation of the customer.

[Click here to view Northern Middle's Support Service Policy](#)

***D.10 The referral process in the Northern Middle Workforce Area.***

The customer referral process begins with a common intake through the states VOS system and intake form. The referral process is tracked by the OSO and reported to the Board on a quarterly

basis. (See attached referral form). Title III Team leads of the comprehensive centers also monitor the referral process on a monthly basis. All required and additional partners within the AJC system have agreed to a referral process outlined in detail in section 8 of the MOU. Due to technological limitations of some partner programs, and others due to legal limitations within their funding sources, refer to other agencies through the paper referral and “warm handoff” dependent on the gaining agency and its physical location. The referral process between programs is also further described in section C, Partnership, in the One Stop Certification documents for all 14 certified centers in the Northern Middle Workforce area, which are on file with the state Workforce Board.

Program	Referral (co-enrollment)	Program
SNAP		Title I
TANF		Title I and Title II
Unemployment Insurance		Title I, II, III, IV & SNAP
RESEA		Title I
Veterans		All Titles
Adult Education		Title I Youth & Adult

A “warm handoff” happens mostly in Comprehensive Centers and customers are walked to an alternate office for a new program appointment. Emails are sent between counselors in multiple offices to set appointments for customers. Phone calls between case managers set appointments for customers. Business teams coordinate via calls and meetings between centers to assist business customers. Referrals to UI will be referral to the website, the 1-844 number or via Zen desk.

At the initial point of contact and point of entry to the AJC, whichever agency initiates contact becomes the base agency for assistance. During the common intake and the initial assessment that agency can determine barriers to employment, barriers to up-skilling, barriers to hiring needs and deliver the services within their jurisdiction. Once the barriers are identified to which that agency cannot help, the initial agency then begins the referral process based upon the availability of the partner program and agreed upon within the MOU in section 8. Each agency is trained by the OSO on what other resources within the AJC system can be leveraged to assist job seekers and avoid duplication. Agencies brief other programs through weekly staff ‘huddles’ to further understand all of the services available to customers within the AJC system.

Northern Middle is fortunate to have numerous partners such as TANF, SNAP, RESEA, etc. located on-site within the majority of the affiliate and comprehensive AJCs. Title I participants may be referred to various partners after an initial assessment and the needs of the participant are identified. When the partner is physically located in the AJC, the participant may be escorted to the partner for introduction and a warm in-person handoff referral. External partner referrals may take place through a phone call, AJC referral form or other electronic means to set an appointment for the participant. TANF referrals are submitted and tracked through Salesforce, an internal case management system used by Workforce Essentials Families First staff.

With Northern Middle being an Employment Network as well as operating a Ticket to Work program with trained staff, Northern Middle is prepared to assist those with disabilities to receive services at all locations. Five centers have a VR representative located on site. Thirteen county centers have a resource center with an electronic table for computer use as well as all computers have the capability to adjust screen size, color, text, and voice for those with some level of impairment. Additional devices are available such as joystick, track ball mouse or specialized keyboards for those that require them.

All centers are wheel chair accessible and have power assisted door openings other than the three state owned buildings. Sign language interpretation is also available when requested and language line is available for other non-English speakers. DVOPs are available throughout to assist veterans with SBE's and reentry individuals are triaged by staff through assessments and IEPs developed to leverage partner resources to eliminate barriers and burdens blocking career pathways.

**E. Northern Middle will provide Adult and Dislocated Worker employment and training activities.**

Adult and Dislocated Worker activities are delivered through Mid Cumberland Workforce Services (MCWFS), the Career Service Provider for the Northern Middle Board. MCWFS accomplishes this by providing a network of approximately 35 FTE Career Specialists across the 13 county workforce area housed in the 14 certified AJC's. Additionally MCWFS Data Specialists, Career Service Managers, and a Program Administrator provide the administrative, performance management and supervision to ensure that goals and objectives are met, to include expenditures, as well as exceeding performance metrics. MCWFS has deployed these personnel across the AJCs system at a density based on past county numbers and current economic conditions to ensure customers receive efficient and blended services.

***E.1 Northern Middle's assessment of the type and availability of Adult and Dislocated Worker employment and training activities in the Northern Middle area.***

Customers are initially assessed for program eligibility by the CSP staff. After eligibility and appropriate documentation the participant, in conjunction with the Career Specialist completes an Objective Assessment in which goals are set and an Individual Employment Plan is set in place. This plan is tailored to the customer's needs and status and eliminates barriers to allow them to progress to a middle skilled self-sustainable employment. If training or up-skilling is a part of that plan, the individual will be given access to local schools that provide in-demand training that is on the Eligible Training Provider List. Since it is required under WIOA to have customer choice, once the customer chooses an educational institution that leads to a certification they are encouraged to visit and tour the campus to get a better feel of the actual training that will occur. Because many of the counties in Northern Middle are on the TN/KY border, the Board does send customers to KY for training ensuring that the training is on the KY ETPL.

***E.2 The Northern Middle Board will coordinate workforce investment activities carried out in the local area with statewide rapid response activities.***

The Northern Middle Tennessee Workforce Board is the primary contact to receive WARN communication from the TDLWD. Board staff makes the initial contact with the employer to meet and determine the needs of the employer and the dislocated workers. In conjunction with the employer, the Board staff develops a plan of action that includes a needs assessment, a communication plan for internal and external stakeholders, internal marketing support materials to promote Rapid Response events and meetings, plans for education fairs and job fairs, and dates for employee meetings to educate workers about the unemployment process. In addition, if there is a mass permanent layoff or plant closure, the Board staff coordinates with other state units to provide services. For example, the Unemployment Team is contacted to participate in Rapid Response Mass Employee meetings, and the Trade Adjustment Act (TAA) Team is contacted if there is an indication that any job loss could be trade impacted. In addition, the Board staff contacts both the OSO and CSP to implement the services and support for dislocated workers. The American Job Center team works to provide individual employee

career counseling to determine education and training needs, or to provide job search assistance such as resume writing workshops or mock interviews. A Rapid Response event calls for a sense of urgency and coordination of efforts. Frequent communication with the employer and employees helps reduce the stress of this often-tenuous circumstance. Bringing in additional resources increases the level of service to both the business and the employees through facilitating access to subject matter experts.

#### **F. The process in which the Northern Middle area will provide youth activities.**

MCHRA, the youth contractor for the NMTWB provides a full array of Youth services and has done so across the state since the inception of WIOA. The Youth Services are delivered throughout the NMWA in the AJC system by a group of specialized Youth Career Specialists whose sole focus is developing career pathways for youth experiencing barriers to employment. It begins with outreach and recruitment as well as determining eligibility with focus on high school dropouts through Adult Education and TANF single parents. The Board has recently shift priority focus from exclusively serving out-of-school youth to allow 25% in-school youth. Relationships with secondary CTE Directors have already been developed and will be the focus for building career pathways such as in Rutherford County [Click for example](#). Once deemed eligible, an objective assessment is required to ensure a pathway to success in formalizing the Individual Employment Plan. The effectiveness of this process is a customer-centered approach. Formal training for Youth is one possibility to attain credentials and skillsets required for employment. However, OJT, Work Based Learning, Job Shadowing and options such as pre-apprenticeship are explored. The Youth Can model delivered by MCHRA delivers work experience for Youth and all of us remember that 'first job' that started us down the world of work on the correct path. Many of the Youth have additional barriers and support services such as transportation and childcare are required to ease the burdens on the Youth. The NMWB has identified a framework that supports MCHRA and eligible youth by offering the 14 elements required under WIOA. [Click here for Youth Framework](#) and [Youth MOUs](#). Follow-up is key to assisting the youth to stay on track so MCHRA staff has incentives to boost the Youth's morale and award them for their accomplishments as they continue on their career pathway.

##### ***F.1 Northern Middle's description and assessment of the type and availability of youth workforce investment activities in the area, including activities for youth who are individuals with disabilities, which includes an identification of successful models of such activities.***

The Northern Middle Board focuses assets through AJC partners in many areas to assist youth with disabilities. Three areas programs are listed below:

\**Ticket to Work program (TTW)*, an innovative program for persons with disabilities who want to work and participate in planning their employment. The TTW Program increases available choices when obtaining employment services and other support services needed to get or keep a job. It is a free and voluntary service. For youth 18-24 years old in receipt of Social Security benefits (beneficiaries) their ticket can be assigned to Workforce Essentials Inc. These Youth may be co-enrolled with WIOA Titles I-IV programs.

\**Pre-Employment Transition Services (Pre-ETS)* offers students age 14-22 (in-school) with disabilities career exploration; work-based learning experiences; exploration of education and training programs for after high school; workplace readiness training to develop social and independent living skills; and self-advocacy. Through a contract with Tennessee Vocational Rehabilitation, Workforce Essentials, Inc. works with students, their families, their schools, and community partners to enrich transition planning and support



students with gaining knowledge and experiences necessary so they may make informed decisions about their future. These youth are referred to WIOA Title I youth programs at graduation.

*\*Work Incentives Planning and Assistance* is a key component of Social Security's strategy to promote employment and economic self-sufficiency among disability beneficiaries and reduce dependence on SSI and Title II cash benefits. This includes youth specific counseling on Age 18 Redetermination assistance, Student Earned Income Exclusion, Plan to Achieve Self Support (PASS Plan), SSI/SSDI employment supports, Achieving a Better Life Experience (ABLE), Guidepost to Success, Financial Literacy, Continued Payment under Vocational Rehabilitation or similar program (Section 301).

***F.2 Northern Middle's description of how the area will meet the requirement that a minimum of 50 % with waiver, or 75 % without waiver, of the youth expenditures be for out-of-school youth.***

In order to meet the requirement that 75% of youth funds are spent on out-of-school youth, the Northern Middle Workforce Board chose to primarily serve out-of-school youth. The service strategy is focused on youth 18-24 years of age who do not have a high school diploma or equivalent and those with other barriers to employment. ITA's and associated supportive services are provided for Occupational Skills Training and a year-round Work Experience program is offered to help out-of-school youth gain valuable work experience.

The Career Service Provider, the Fiscal Agent, and Board staff track youth expenditures on a monthly and cumulative basis to ensure that the 75% requirement is met.

***F.3 Northern Middle's description of how the areas will meet the requirements of the in-school youth waiver including the expenditure requirement for in-school youth and individual training account (ITA) opportunities for at-risk in-school youth.***

Since the Board has opted out of the waiver the NMTWB, through its provider MCWFS, is serving youth who are attending a variety of higher education career pathways primarily through the TCAT system in areas such as health care, welding, mechatronics and automotive. These youth are being supported through ITA's and support services via Title I funding.

**G. Northern Middle will provide services to priority populations as outlined in Tennessee's State Combined Plan.**

The Northern Middle Board has a policy and procedure for determining priority of services. The following process is used to determine priority:

- A. Priority is determined during the eligibility process.
- B. *Basic Career Services* are available to all job seekers without priority.
- C. To be eligible to receive WIOA *Adult Individual Career or Training services*, an individual must be all of the following:
  - a. 18 years of age or older;
  - b. Citizen or noncitizen authorized to work in the United States; and
  - c. Meet Military Selective Service registration requirements (males only)
    - a. Career coach will assess the client's income for the past six-months prior to the date of enrollment.
    - b. Client will provide documents to the Career Coach as proof of earnings six-months prior to the date of enrollment. Documents may include paycheck stubs, public



assistance records, State MIS, Social Security benefits, UI documents, self-attestation, or case notes.

D. Determine Basic Skills Deficiency

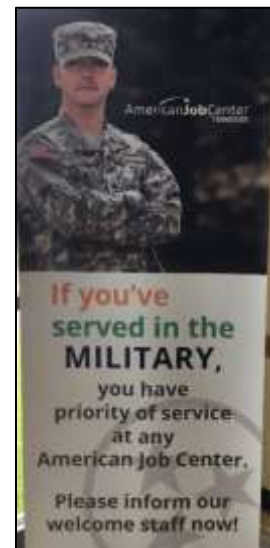
WIOA Section 3(5)(B) “An individual who is unable to compute or solve problems, read, write, or speak English at the level necessary to function on the job, in the individual’s family, or in society.” The Career Coach will determine basic skills deficiencies by an objective, valid, and reliable assessment. Documentation of the assessment will be maintained in the participant’s file, clearly stating name, date of test and results.

***G.1 Priority will be given to recipients of public assistance, other low-income individuals and individuals who are basic skills deficient consistent with WIOA Sec. 134(c)(3)(E). (§ 679.560(b)(21)) in Northern Middle.***

With respect to funds allocated to a local area for adult and employment and training activities, priority shall be given to recipients of public assistance, other low-income individuals who are basic skills deficient for receipt of career and training services. The Board has directed the One Stop Operator to make determinations related to such priority.

*Priority of Service for the Title I Adult program must be applied in the following order:*

- a. Veterans and eligible spouses who meet the statutory priority of public assistance recipients, other low-income individuals including the underemployed, or those who are basic skills deficient and Title I Adult program eligibility must receive first priority for services;
- b. Other individuals (not veterans or eligible spouses) who meet the statutory priority of public assistance recipients, other low-income individuals including underemployed, or those who are basic skills deficient and Title I Adult program eligibility then receive the second priority for services;
- c. All other veterans and eligible spouses who do not meet the statutory priority of public assistance recipients, other low-income individuals including the underemployed, or those who are basic skills deficient but do meet Title I Adult program eligibility then receive the third priority for services;
- d. Other individuals (not veterans or eligible spouses) who do not meet the statutory priority of public assistance recipients, other low-income individuals including underemployed, or those who are basic skills deficient, but do meet Title I Adult program eligibility but, and is an individual with one of the following barriers to employment (Indians, Alaska Natives, Native Hawaiians, individuals with disabilities, older individuals over 55, ex-offenders, homeless, youth aged out of foster care, English language learners, individuals with low literacy levels, individuals with substantial cultural barriers, eligible migrant and seasonal farmworkers, single parents including single pregnant women, and long term unemployed individuals receives fourth priority for services;
- e. Other individuals (not veterans or eligible spouses) who do not meet the statutory priority of public assistance recipients, other low-income individuals including the underemployed, or those that are basic skills deficient, and do not meet the local discretionary priority, but do meet Title I Adult program eligibility, then receive the fifth level of priority for services.



***G.2 The Northern Middle Board will determine priority populations and how to best serve them, along with any other state requirements.***

Priority of service begins at the point of entry of all the American Job Centers of the Middle TN region. It is not only the physical sites but also via any web portal for those applying for services. It is the responsibility of the One Stop Operator to ensure that all staff of the AJC are trained to assist those requiring priority of service. Priority of service falls in to two main areas; priority of service to veterans and priority of service for the WIOA Title I Adult program. Northern Middle has aligned their veteran programs under the Jobs for Veterans Act to all employment and training programs funded in whole or part by the Department of Labor. The workforce area have banners and signage up at the entrances of all the comprehensive and affiliate centers notifying Veterans and eligible persons that they have priority of service. All CSP staff and partners and OSO has received training and/or have processes in place to deliver high quality customer service to those who take precedence. Additionally, the Board has broken out into three committees of which one is a Special Populations committee. This committee is comprised of Board members who are focused on those with disabilities as well as those with a military background especially with the areas proximity to Fort Campbell. This allows the Board more immediate flexibility to adjust resources to those priority populations.

***G.3 Northern Middle will focus efforts on priority populations to help meet the negotiated State and Local Performance Measures (Key Performance Indicators).***

WIOA focuses on serving individuals with barriers to employment and seeks to ensure access to quality services for these populations. Priority of service status is established at the time of eligibility determination and does not change during the period of participation. When providing individualized career and training services in the Title I Adult program, priority is given to recipients of public assistance, other low-income individuals, individuals who are basic skills deficient, and veterans within this group. Career Services Provider is monitored monthly/quarterly to ensure that individuals who meet the priority of service requirements are being served. Key Performance Indicators (KPIs) were issued by TDOL effective January 1, 2020, and reports are reviewed monthly. Two of the targets set forth in KPIs are co-enrollments of SNAP and TANF recipients, which meet the definition of “low-income” defined within priority of service.

**H. Northern Middle’s description of training policies and activities in the local area.**

Individuals Training Accounts (ITAs) are used to allow adults, dislocated workers and out of school youth to participate in training that will lead to self-sufficient employment. In order to expend WIOA dollars on training the training provider must appear on the state approved training provider list. Additionally, training must be a demand occupation for the local area or for the area in which a customer is willing to commute or relocate. The NMTWB also approves training services for occupations determined by the Board to be in sectors of the economy that have a high potential for sustained demand or growth in the local area. In-demand information is obtained from “Bright Outlook” in the VOS data base system. Training should be short-term and not exceed 18-24 months in duration and result in a recognized credential such as a degree, certificate, license, etc. Targeted sectors have been identified for the Northern Middle area that include: Advance Manufacturing, Transportation and Logistics, Information Technology (IT), Construction, and Healthcare. In keeping with the identified sectors, the top training programs utilized by WIOA customers in the Northern Middle Area are Commercial Driving License (CDL), Practical Nursing/Nursing, Project Management Professional, Industrial Maintenance/Electronics, and Registered Dental Assistant.

***H.1 NMTWB will encourage the use of work-based learning strategies to include local goals for specific work-based learning activities and proposed outcomes***

Work-based learning (WBL) is a proactive approach to bridging the gap between high school and high-



demand, high-skill careers in Tennessee. Students build on classroom-based instruction to develop employability skills that prepare them for success in postsecondary education and future careers. The Northern Middle Board has contracted and budgeted funds for the CSP youth provider MCHRA, to create career pathways for youth in WBL activities to build a pipeline of skilled employees for the future workforce. Through experiences like internships, apprenticeships, and paid work experience, juniors and seniors (16 years or older) may earn high school credit for capstone WBL experiences. WBL coordinators are educators who are trained and certified by the department

to coordinate these WBL experiences for students. In an increasingly complex global economy, all students must be prepared with intellectual, technical, and social skills needed to compete and contribute meaningfully to their communities. For most, this will mean completing some postsecondary education or training; for all, it will mean learning about themselves and the world of work.

***H.2 Training services outlined in WIOA Sec. 134 will be provided in Northern Middle through the use of individual training accounts, including, if contracts for training services will be used, how the use of such contracts will be coordinated with the use of individual training accounts under that chapter.***

The Board will provide training services through the use of individual training accounts, including contracts for training services using individual training accounts, and will ensure customer choice in the selection of training programs regardless of how services are provided. The Board will also ensure to provide an assessment for youth workforce activities to include youth with disabilities and identify successful models of those activities. Individual training accounts allow Adults, Dislocated Workers and Out-of-School Youth to purchase training that will assist them in obtaining self-sufficient employment. Priority of services will be observed when providing ITA. The Training Program must appear on the state approved training provider list. Training must be a demand occupation. In-demand information can be obtained from "Bright Outlook" in the VOS data base system. Training must result in a recognized credential such as a degree, certificate, license, etc. Training should be short-term and not exceed 18-24 months in duration. Ideally, training of 12 months or less is preferred. Training ITAs cannot be issued for more than \$6,000 per enrollment without the approval of the Board. All other available financial resources such as Pell grants, TN Reconnect, TN Promise, Wilder/Naifeh, Lottery, TSAC, other scholarships, etc., must be used first towards payment of tuition, fees and books prior to WIOA dollars being expended. If customer is attending training at the time of WIOA enrollment, they must submit grades/progress reports before ITA is issued to ensure satisfactory progress is being met. Customer must provide grades/progress reports at the end of each quarter/semester/etc. or additional funds will not be authorized. ITAs are to be awarded per training provider term. The Career Coach will issue the ITA. Participants will be provided information on the Training Providers in order to make an informed choice. Out of state and on-line training provider programs must be on their states eligible training provider list before an ITA can be issued. A copy of the completed ITA must be forwarded to the training provider. In order to efficiently manage WIOA funds a Career Coach must de-obligate the remaining balance or unexpended funds to be recaptured and allocated to other customers.

Contracts for services may be used instead of an ITA only when one or more of these exceptions apply. The services provided are OJT, customized training, incumbent worker training, or transitional jobs; The Board determines that there are an insufficient number of Eligible Training Providers in the local area to accomplish the purpose of a system of ITA; The 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; The 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 the Board is considering entering into a pay-for-performance contract and the Board ensures that the contract is consistent with 20 CFR 683.510.

The Northern Middle Tennessee Workforce Board maintains the Eligible Training Provider List and presents changes and additions to the Board for review. New providers must have Tennessee Higher Education Commission (THEC) approval and then meet with Board staff to describe programs prior to Board review. Board staff and/or board members make site visits to new providers if applicable. The Board staff provides technical assistance to ensure the CSP team understands the ETPL and WIOA requirements. In addition, the Board staff evaluates provider performance and reports those findings to the Board to ensure quality training and instruction options are available to customers.

The NMTWB has the largest selection of eligible providers of any workforce in the state. It also includes its neighbor KY due to bordering territories and extends options so that customers truly can have customer choice under WIOA specifically 679.380. The dissemination of this list of approved providers is on the Jobs4TN.gov and lists providers and training programs that provide local and regional training opportunities which is governed through the states Eligible Training Provider List (ETPL). This portal for educational opportunities also gives feedback as to the success of each program depending on the institutions history of graduation rates and job placements as well as the Boards requirement to ensure there is a Bright Outlook for this training. The One Stop Operator ensures that all AJCs and especially the CSP is fully capable to assist customers that after initial assessment and eligibility, would be best for them to attend additional training to become up skilled. The final career decision however, is up to the customer, but through case management guidance and analysis of ETPL programs, the customer is able to make informed decisions in their choice for aligned training when launching new careers.

[Click here to view Northern Middle's Individual Training Account Policy](#)

***H.3 Northern Middle Board will ensure the continuous improvement of eligible providers of services through the system and that the providers will meet the employment needs of local employers, workers and jobseekers. Includes a copy of the local training provider approval policy and procedures.***

The ETPL evaluation system is under review at the state level and may impact the scope of future ETPL reports. However, the local Board staff compiles a comprehensive annual ETPL performance report for Board review. The evaluation includes provider performance measures: completion rate, credential attainment rate, and employment. The exit wage is also included in the performance report. (See sample report for June 2020 NMTWB meeting.) Individualized reports are shared with training providers in a focused effort to improve outcomes. The focus for the 2020/2021 program year will be credential attainment. The ETPL enrollment numbers align with the NM Sector Strategies.



The Northern Middle Board aligns its ETPL to support the states Tennessee Pathways initiative which was created to ensure at least 55 percent of Tennesseans have a college degree or certificate by 2025 and can access more career opportunities in their communities across the state. Tennessee Pathways supports alignment among K-12, postsecondary, and industry to provide students with relevant education and training to jumpstart their postsecondary degrees and credentials. Students, with their certificate, degree or credential, can transition seamlessly into the workforce and contribute to the success of our economy. The Northern Middle Workforce Development Board is focusing efforts and resources on Career Pathways in Health Care, Advanced Manufacturing, Information Technology, Construction, Transportation and Logistics and K-12 Education.

[Click here to view Northern Middle's ETPL policy](#)

**H.4 Northern Middle has reviewed the eligible training providers to determine if there are enough providers to meet the demand of industry.**

The NMTWDB analyzes job demands and projected growth when determining sector strategies and staff direction. The board reviews Labor Market Information (LMI) on both the local and regional level. At this time, there are 103 active training providers with 39 hosting current WIOA enrollments. The top 10 programs and top 10 providers align with the NM Sector Strategies. At the request of the Board, an ETPL performance analysis was completed and presented with recommendations focused on prioritizing programs that consistently meet the WIOA performance measures of completion, credential attainment and self-sustaining exit wage. This analysis will be completed annually.



[Click here to view Northern Middle's ETPL report](#)

**I. The Northern Middle area will implement initiatives such as apprenticeships, incumbent worker training programs, on-the-job training programs, customized training programs, industry and sector strategies, career pathways initiatives, utilization of effective business intermediaries, and other business services and strategies designed to meet the needs of employers in the corresponding region in support of the business service strategy.**

The Northern Middle Workforce Board has a full array of programs and services to speed the connection of career pathways for both job seekers and employers. From incumbent worker training grants, to registered apprenticeship programs to work based learning, the NMTWDB is delivering the programs that make a difference in job seekers lives and are positioning companies to remain competitive in a global environment. Apprenticeships are proven strategies connecting individuals to a

career pathway that is structured and industry recognized. Incumbent worker training (IWT), is a competitive grant delivered by workforce boards that provides funding to help eligible Tennessee businesses effectively train and retain employees by providing skills upgrades and process Improvement training for existing, full-time employees.

A Successful apprenticeship program launched by the NMTWB is with **Empower Electric** and the Tennessee College of Applied Technology at Nashville as the training provider. A total of 27 men and women enrolled in the program, and up to **\$136,346** will be provided to cover the tuition component of the program, at approximately \$5,000 per apprentice. These electrical apprentices enrolled in this career pathway from around the region and the Northern Middle Board was pleased to have Kenyatta Lovett. The Assistant Commissioner for Workforce Services as the guest speaker at the kickoff celebration for the electrical apprenticeship.



The NMTWB works with members of the BST to educate employers about the availability of IWT and OJT funds to assist in upgrading skills of new and existing employees. Information about these programs is also found on both the NMTWB and Workforce Essentials, Inc. websites. BST assists in building employer relationships, marketing, and facilitating the use of AJC services such as IWT and OJT grants. In January and February of this year, twelve employers in the Northern Middle area applied for and were awarded IWT contracts for \$200,000 to serve 250 incumbent workers. These IWT employers consist of Manufacturing, Construction, and Healthcare, which cover three of the five industry sectors identified as in-demand employment opportunities in the Northern Middle area. Due to COVID, scheduled onsite and offsite employer trainings were cancelled and several employees were forced to implement temporary layoffs resulting in employers not being able to spend 100% of their awarded contracts. Some employers were able to conduct training using virtual platforms resulting in about a 50% expenditure rate of grant funds. As employers and businesses attempt to return to normal, the NMWB and BST will continue to recruit, promote, and educate employers on AJC services available to them. See the Northern Middle IWT graphs below that cover industry sector strategies in advanced manufacturing, healthcare, transportation and logistics, information technology and construction. This incorporates five of the six industry sectors supported as in-demand and growth opportunities in middle Tennessee.



Incumbent Worker Training Grants					
	Company	County	Sector Strategy	Grant Amount	# Trained
1	JL Plumbing	Cheatham	Construction	\$ 25,000.00	1
2	Tennsco	Dickson	Manufacturing	\$ 18,500.00	40
3	Hoist and Crane Service Group	Davidson	Manufacturing Service (Overhead Systems)	\$ 25,000.00	3
4	Hyun Tech	Montgomery	Manufacturing Service	\$ 20,000.00	5
5	Progressive Directions	Montgomery	Healthcare (Disabilities)	\$ 1,431.00	9
6	D&B Solutions	Montgomery	Manufacturing Service (Electrical)	\$ 5,000.00	5
7	Wellpath	Davidson	Healthcare	\$ 25,000.00	6
8	Industrial Maintenance	Sumner	Manufacturing	\$ 25,000.00	7
9	Caymas Boats	Cheatham	Manufacturing	\$ 25,000.00	20
10	Wearwell	Rutherford	Manufacturing/Healthcare Service (Flooring)	\$ 25,000.00	18
11	Intermetro Industrial Corporation	Rutherford	Manufacturing	\$ 24,065.00	80
12	Civil Constructors, LLC	Williamson	Construction	\$ 25,000.00	20
<b>Total</b>				<b>\$ 243,996.00</b>	<b>214</b>

Incumbent Worker Apprenticeship Training Grants					
	Company	County	Apprentice Type	Grant Amount	# Enrolled
1	Empower	Davidson	Electrical	\$ 131,476.50	27
2	Merryman Farr	Davidson	HVAC	\$ 39,295.50	17
3	Interstate AC	Davidson	HVAC	\$ 9,246.00	4
4	S & W Contracting	Rutherford	NCCER Electrical	\$ 64,391.00	19
5	North American Stamping	Sumner	Tool and Die	\$ 29,950.02	9
6	Autocam Medical	Rutherford	Machinist	\$ 3,072.00	6
7	Integrated Control Systems	Rutherford	Machinist	\$ 512.00	1
<b>Total</b>				<b>\$ 277,943.02</b>	<b>83</b>

**J. Northern Middle’s Business Services Team is structured and the process of disseminating the service strategy for employers from the LWDB to the team members responsible for implementation.**

The Business Service Team is structured with Title I and Title III staff as its foundation, with TANF and VR partners supporting operations. In addition, Job Corps and Adult Education support the BSD team through IET and supply pipelines. It falls under the direction of the OSO who tailors the teams to ensure the services delivered are professional and responsive. The lead of each Business Team throughout the Northern Middle Area is a Local Veterans Employment Representative, or LVER, who begins initial contact and formulates the plans and gathers the resources to meet the needs of industry. The Business Service team is coordinated by Leads at Comprehensive Centers and organized through the efforts of the OSO to answer to the needs of business and industry. The team lead carries a wide variety of services with them such as those listed: A) Jobs4TN.gov B) American Job Centers C) Mobile American Job Center D) Veteran’s Services E) Apprenticeship Assistance Training Grant F) On-the-Job Training Grant G) Incumbent Worker Training Grant H) Federal Bonding. Business service staff are responsible for meeting directly with business leaders and their purpose is threefold: 1. During these meetings the teams will form positive relationships, assess the needs of the employer, and formulate a customized plan to develop the targeted workforce. 2. Business service staff will report directly to the Team Lead of their American Job Center to disclose information regarding which employers they met with, which programs were offered, and how many employees will be served. 3. This data is then compiled by the One-Stop Operator and reported to the Local Workforce Development Board (LWDB) for performance review.

The OSO then measures the performance of the Business Service Team using these three criteria: 1. Retention of an employee with the same employer for the second and fourth quarter after exit from the program. 2. Repeat business customer rate measures the percentage of employers who receive core services more than once in the last three recording periods. 3. Employer penetration rate measures the percentage of employers using services in the State. These are reported to the Board on quarterly meetings and immediate feedback given to the local AJC to set the stage for service to the business customer.

**K. Northern Middle's initiatives in implementing programs to insure accessibility to services in At-Risk Counties.**

The NMTWB has physical offices in all 13 of its counties, open 5 days a week 8-4:30 ensuring that AJC services are delivered to job seekers as well as business and industry and are accessible for all customers within the LWDA. Houston County is the only Distressed County within the workforce area and the office located in Erin TN provides direct Title I, Title II, Title IV services as well as referral by appointment of Title III services. A computer resource center is also available with high speed internet that allows the county residents to conduct job search as well as access to training and general WIOA information. Job fairs by select employers are also held within the center. These services are aligned through the partner MOU and IFA signed by all partners within the region. The Bridge to Work GIVE grant and the Rural Initiative are targeting high school youth into a career pathway into advanced manufacturing and focuses specifically in Houston County.

***K.1 Northern Middle Board has implemented new programs to best serve the rural area (to include Distressed and At-Risk Counties).***

To support Governor Lee and the Tennessee Department of Labor and Workforce Development's rural initiative, NM is providing a Certified Production Technician Training in coordination and leveraged with the GIVE and SPARC initiatives. It establishes a new Advanced Manufacturing workforce pipeline to meet regional workforce needs by creating a collaboration of individuals representing, K-12 education, post-secondary education, workforce development, and local employers. This unique collaboration provides the Northern Middle Tennessee region with valuable tools to increase the number of students and adults gaining post-secondary credentials needed to meet the Drive to 55 goals. This region, prior to the COVID pandemic, has seen dramatic growth within the manufacturing sector, and renewed efforts must develop entry-level workers with a strong work ethic and basic manufacturing-related skills necessary to be successful. The BRIDGE to Work ensures that Houston County, a distressed county in Northern Middle, as well as Stewart and Humphrey's Counties have a career pathway opportunity, especially for youth to up-skill and earn a living wage in a bright outlook industry sector such as manufacturing. On the eastern side of the Northern Middle Area the Board has established a specialized center in Trousdale County this year which for the first time allows the full array of AJC services to be delivered in the county through this center.

**L. The Northern Middle is serving individuals who will be re-entering the workforce who were previously incarcerated or justice involved.**

The Northern Middle Board has initiated Adult Education programs in the Cheatham, Dickson, Houston, Montgomery, Robertson, Rutherford, Stewart, Sumner, Williamson and Wilson County detention facilities. Classes have resulted in over hundreds of HiSet diplomas received by inmates prior to release. This

eliminates a severe barrier to employment and prior to release many are co-enrolled in Title I programs to ensure other barriers are eliminated and they are better prepared to enter the workforce. In Sumner County, the Board and its CSP contracted partner, Mid Cumberland Workforce Services have developed a work release program with the County Judges and Sheriff's Department. The Judges nominate incarcerated individuals prior to release to begin a work experience/ employment program with local businesses. They are enrolled in Title I and receive soft skill training in the jail. They are then assessed and matched to employers such as the GAP warehouse, O'Charleys and other manufacturers in the Industrial Park. Braiding funds with other partners, Title I transports them each day to the workplace where they earn actual wages while employed. Each night they are returned to the prison until release. The inmate is able to begin to pay off court costs, develop workplace habits and skills and in most cases remain employed with the employer after release. This reduces recidivism and returns them into the civilian world of work with purpose and hope.

***L.1 The Northern Board will be implement new programs to best serve those who were previously incarcerated or justice involved.***

The Northern Middle Board, prior to establishment of the Specialized Center began to work with Trousdale County Core Civic facility to establish a pipeline of early released inmates into the construction field specifically in pouring and finishing concrete both in commercial and residential construction. Additionally, the plan is to deliver both in and out of the Core Civic facility, a series of Adult Education classes geared to delivering the final HiSet equivalency diplomas and possible prep for enrollment into nearby TCAT classes. Dr. Cockrell was also contracted with the Board to deliver a series of educational and motivational seminars to inmates to show pathways of success and techniques to utilize to ensure that personal actions and decisions do not result in a return to prison. Due to an inmate murder and the then 50% positive COVID test of all inmates and staff within the facility, all these plans are on hold and will launch, hopefully in phases this fall when restrictions within Core Civic are eased.

## **PERFORMANCE GOALS AND EVALUATION**

The NMTWB has a strong history of being a high-performing workforce board and strives to remain the highest performing workforce area within the state. It accomplishes this through strong partnerships and a clear vision that is focused on business and job seekers while leveraging resources from stakeholders and partners.

The following activities will be a focus in PY2020 through 2024:

- *Data-Driven Planning and Performance Management:* The Board will continue to enhance its workforce service delivery outcomes by establishing benchmarks, developed through data and program analysis, to develop efficient, effective service delivery plans and improve performance management and monitoring. These efforts will include the analysis of local area and regional economic conditions to be proactive in the provision of sector and career pathway services.
- *Innovation and Evidence-Based Best Practices:* Board staff are engaged with national, state, regional, and local associations and initiatives in a variety of focus areas including re-entry and youth opportunities. Northern Middle will evaluate evidence-based service delivery models and program designs and implement those that advance the economic self-sufficiency of individuals and economic growth of employers.

**A. Northern Middle's levels of performance negotiated with the Governor and chief elected official consistent with WIOA Sec. 116(c), to be used to measure the performance of the local area and to be used by Northern Middle for measuring the performance of the local fiscal agent (where appropriate), eligible providers under WIOA Title I Subtitle B and the one-stop delivery system in the local area.**

The Northern Middle Board negotiated performance along with the Chief Local Elected Official (CLEO) and reached an agreement on local performance based on State levels. The Board and CLEO made

Northern Middle Core Performance Indicators PY2019						
Federal Performance Indicator	Adult	Dislocated Worker	Youth	Adult Education	Wagner-Peyser	Voc. Rehab.
Employment Rate 2 <sup>nd</sup> Quarter after exit	83.5%	82.0%	79.50%	Baseline	66.0%	Baseline
Employment Rate 4 <sup>th</sup> Quarter after exit	83.5%	82.0%	76.00%		66.0%	
Median Earnings 2 <sup>nd</sup> Quarter after exit	\$6,650.00	\$7,000.00	N/A		\$4,700.00	
Credential Attainment w/in 4 Quarters after exit	59.0%	69.0%	72.00%		N/A	
Measurable Skills Gains	Baseline	Baseline	Baseline		N/A	
Effectiveness in Serving Employers	Baseline					
Northern Middle Core Performance Indicators PY2020 & 2021						
Federal Performance Indicator	PY 2020			PY 2021		
	Adult	Dislocated Worker	Youth	Adult	Dislocated Worker	Youth
Employment Rate 2 <sup>nd</sup> Quarter after exit	TBD	TBD	TBD	TBD	TBD	TBD
Employment Rate 4 <sup>th</sup> Quarter after exit	TBD	TBD	TBD	TBD	TBD	TBD
Median Earnings 2 <sup>nd</sup> Quarter after exit	TBD	TBD	TBD	TBD	TBD	TBD
Credential Attainment w/in 4 Quarters after exit	TBD	TBD	TBD	TBD	TBD	TBD
Measurable Skills Gains	TBD	TBD	TBD	TBD	TBD	TBD
Effectiveness in Serving Employers	Baseline					

adjustments for expected economic conditions and characteristics of participants to be served in Northern Middle. The performance applicable to the performance year reflects the actual economic conditions experienced and characteristics of the population served using statistical models. The Board and the LEO voted in the November 2018 meeting to adopt the state performance goals listed above for PY2019. The NMTWB will negotiate the PY 20 & 21 targets by September, 2020.

Tennessee's core targets for PY2020 are:

State Core Performance Indicators PY2020						
Federal Performance Indicator	Adult	Dislocated Worker	Youth	Adult Education	Wagner-Peyser	Voc. Rehab.
Employment Rate 2 <sup>nd</sup> Quarter after exit	83.5%	82.5%	79.5%	41.0%	66.0%	Baseline
Employment Rate 4 <sup>th</sup> Quarter after exit	83.5%	82.0%	79%	42.0%	66.0%	
Median Earnings 2 <sup>nd</sup> Quarter after exit	\$6,650	\$7,000	\$3,300	\$3,300.00	\$4,700.00	
Credential Attainment w/in 4 Quarters after exit	59%	69%	70%	30.00%	N/A	
Measurable Skills Gains	52%	48%	45%	35.00%	N/A	
Effectiveness in Serving Employers	Baseline					
State Core Performance Indicators PY2021						
Federal Performance Indicator	Adult	Dislocated Worker	Youth	Adult Education	Wagner-Peyser	Voc. Rehab.
Employment Rate 2 <sup>nd</sup> Quarter after exit	84%	82.5%	80%	42.0%	67.0%	Baseline
Employment Rate 4 <sup>th</sup> Quarter after exit	83.5%	82%	80%	43.0%	67.0%	
Median Earnings 2 <sup>nd</sup> Quarter after exit	\$5,580	\$7,100	\$3,400	\$3,400.00	\$4,800.00	
Credential Attainment w/in 4 Quarters after exit	60%	70%	71%	31.0%	N/A	
Measurable Skills Gains	53%	49%	47%	36.0%	N/A	
Effectiveness in Serving Employers	Baseline					

**B. Northern Middle is monitoring progress and tracking to meet the negotiated measures and reporting information to the Board.**

State and Local Performance Measures are tracked on a regular basis using the following methods:

- Monthly programmatic and fiscal monitoring by board and fiscal agent staff who review each CSP invoice.
- Monthly reports indicating enrollments, exits, minimum participant cost rate and follow-ups completed.
- Monthly reports issued to the CSP to provide information on fiscal and program monitoring, including MPCR and performance. MPCR Target is 50% for the CSP in the NMWA.
- Quarterly meeting with the CSP to provide technical assistance on reported deficiencies.
- Quarterly reports presented to the Board showing actual vs. planned enrollments and expenditures
- Quarterly WIOA Performance Reports are provided at committee meetings and discussed at full board meetings

The KPI's under WIOA's (15) programs are at various stages of development. Quarterly target measures for (11) partners were effective 01/01/2020. Some targets have yet to be developed.



<b>Northern Middle KEY PERFORMANCE INDICATORS (KPIs) 2020</b>		
<b>Program</b>	<b>Enrollment</b>	<b>Key Performance Indicator</b>
Adult & Dislocated Worker	1524	New Enrollments
Youth	519	New Enrollments
Adult Education	3148	New Enrollments
Adult Education/NICE (IELCE)	211	New Enrollments
Wagner-Peyser	6327	New Enrollments
Senior Community Service Employment Program (SCSEP)	19	Exits
Re-Employment Services & Eligibility Assessment (RESEA)	182	Co-Enrollments
Trade Adjustment Assistance (TAA)	50%	Co-Enrollment Rate
Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T)	508	New Enrollments
Jobs for Veterans State Grants (JVSG)	330	New Enrollments
Migrant & Seasonal Farm Workers (MSFW)	43	New Enrollments
Reentry	219	New Enrollments
Vocational Rehabilitation	TBD	-
Temporary Assistance for Needy Families (TANF)	TBD	-
Distressed Counties	TBD	-

## **TECHNICAL REQUIREMENTS, ASSURANCES, and EVALUATION**

### **A. Physical and Programmatic Accessibility in Northern Middle**

The Board has chosen to invest and create a network of partners and AJC delivery service points in all of its 13 counties. It recently created a Specialized Center in Trousdale County. The Northern Middle Board has a website, nm-wb.org that disseminates information along with multiple social media sites that allows those in remote communities to access workforce options. In early March, prior to the national declaration of a COVID pandemic, a tornado struck the area and created a 50-mile path of destruction. The Board, with the support of TDLWD, facilitated the strategic placement of three Career Coaches into remote areas and areas without power to create workforce services access points. Coaches were poised near FEMA and TEMA sites to leverage services to customers, many who had lost everything. During the recent COVID outbreak, offices were closed to face-to-face operations with customers and all staff worked from behind closed doors or were AWS. Throughout the pandemic, services were delivered to job seekers and employers through a virtual system.

The Northern Middle Board has put policies and prohibitions in place to ensure against discrimination on the basis of age under the Age Discrimination Act, on the basis of sex under Title IX, or on the basis of race, color, or national origin under Title IV of the Civil Rights Act. Programs and activities funded by the Board are considered programs and activities funded under Federal financial assistance and will comply with these Acts. Additionally the Board has in place policies and procedures to prohibit discrimination

regarding participation, benefits and employment; prohibition on assistance for facilities for sectarian instruction or religious worship; prohibition on discrimination on the basis of participant status; and prohibition on discrimination against certain non-citizens.

The One Stop Operator has a network of equipment available to serve people with disabilities to include electric powered tables in resource rooms, track ball mouse and other computer ADA equipment and during monthly huddles conducts training updates on how to assist people with disabilities. All Board leased buildings have power assisted entrance doors to ensure those with disabilities can physically access AJC services. Vocational Rehabilitation staff are on site in four of the centers, DVOP staff are also available, and both are experts in their fields to assist those with disabilities. The Board has comprised one of its committees to be a Special Populations committee of which those with disabilities are represented on that committee by the Boards VR member. All Comprehensive, Affiliate and Specialized Centers have been certified by the Board per the 26-page certification document required through state policy. The Certification team reviews accessibility of all centers and partner delivery of their services through the glass of a person with a disability per pages 11-13 Attachment C of the certification criteria. Additionally, all partners within the MOU specifically section 9 agree to have the processes and equipment in place to serve those with disabilities. The Board also requires the subject matter expert, VR, to conduct a scan of all centers prior to certification, to include suggested upgrades or deficiency corrections until certification is finally approved. The Northern Middle Board also has enrolled to become an Employment network and has a self-sustaining Ticket to Work Program at the AJC to additionally blend funding to assist serving those with disabilities. Electronic tables in resource center, track ball mouse, keyboard accessible, automatic doors are located in most American Job Centers. In addition, all of the Centers in Northern Middle underwent thorough certification and inspection from the Tennessee Department of Vocational Rehabilitation to assure services are accessible to individuals needing accommodations.

## **B. Northern Middle Fiscal Management**

### ***B.1 The entity responsible for the disbursement of grant funds in Northern Middle described in WIOA as determined by the chief elected official or the Governor under WIOA.***

Workforce Essentials Inc. was selected by the Chief Local elected Official via the Interlocal Agreement as the Fiscal Agent and Administrative Entity for the Board. The Fiscal Agent has signed the agreement and understands the responsibilities and liabilities of the role as the sub recipient as described in WIOA Section 107(d)(12)(B)(I)(II). All contacts between the CLEO and Fiscal Agent have clearly defined roles and responsibilities and follow the functions of 20CFR679.420.

### ***B.2 Northern Middle's local procurement policies and procedures and description of the competitive procurement process that will be used to award the sub-grants and contracts for WIOA Title I activities.***

The NMTWDB follows the procurement of goods and services obtained with WIOA funds, as set forth in the requirements provided by the Office of Management and Budget, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards Final Rule Title 2 of the Code of Federal Regulations 2CFR200. The attached Procurement Policy is the guidance followed by the NMTWDB and will remain consistent with WIOA sections 107 and 121 as well as being in agreement with the CLEO in his selection of the One Stop Operator and the Title 1 Career Service Providers. The

NMTWDB will issue a Request for Proposal to a Third Party Administrator (TPA) to conduct the outreach and handle proposals for the Board's One Stop Operator and Career Service Provider. This will hold the Board initially at "Arm's Length" from the process to ensure all proposers have similar competitive access to apply to serve the businesses and job seekers within the 13 county area. The RFP, handled by the TPA, will follow guidelines of the procurement policy as well as WIOA section 121 and applicable TN sunshine laws and state policies. The selected contractors by the Board will enter into contracts with the Board.

[Click here to view Northern Middle's Procurement Policy](#)

### ***B.3 Northern Middle's process to ensure the required 40 percent minimum participant cost rate (MPCR).***

The NMTWB established an annual budget for the region as well as a budget for the career service providers. In order to meet the 40% MPCR, the Board required the career service provider to maintain a 55% MPCR. The Board maintains a dashboard and monitors the career service provider monthly for adherence to the MPCR. Quarterly meetings are conducted with the Career Service Provider to review on-going issues and discuss continuous improvement opportunities. The Northern Middle Board is updated quarterly on performance results. See Page 8 of the [budget materials](#).

## **C. Northern Middle's Budget Information and Supporting Materials**

### ***C.1 Northern Middle's budget including sources and uses of Tennessee Department of Labor and Workforce Development (TDLWD) pass-through funds and all non-Federal matching funds.***

The Board's financial responsibilities, including the budget, are under the supervision of Fiscal Director, Ginger Fussell, CPA and supported through the Fiscal Agent, Workforce Essentials. Specific internal controls to ensure prudent financial management under the Workforce Innovation and Opportunity Act are listed in brief below.

- Organizational structure with assignments of all financial responsibilities to ensure checks and balances;
- An auditable, double-entry fund accounting system that controls assets (e.g. cash), liabilities (e.g. accounts payable) and fund balances by contract, title, subtitle, and location;
- An automated payroll system;
- Financial procedures for all contracts;
- A financial budget with monthly and quarterly reviews;
- Segregation of key financial functions among staff;
- Competitive and cost effective procurement/purchasing procedures with specific guidelines;
- Time and attendance records multiple approvals ;
- Property control, including inventory management monitored by IT;
- A management information system that provides current and accurate financial data;
- A support/obligation control system;
- The capability to report accrued expenditures as required by the contract;
- Sound cash flow management;
- A financial monitoring and internal audit capability to ensure consistency of financial activity;
- Workforce Essentials has not had any findings in company audits in the past 20 years.

[Click here to view Northern Middle's budget materials](#)

***C.2 Northern Middle's budget narrative including a detailed explanation of expenditures by the line items listed on Standard Form 424A. (Including a purpose of travel and supply/equipment lists, and describe expenses in the 'other' line item.70.If applicable, the budget includes personnel or contractual expenses (cash or in-kind resources)).***

The Northern Middle Board approves an annual budget to include specific utilization of funds such as pilot re-entry projects, apprenticeship set-a-sides and outreach and recruitment. The line item budget is reviewed quarter by the Board and modified as needed. The Board approved budget for 2020-2021 can be attached in the budget section. A line item narrative for the 2020-2021 budget year is listed below:

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### **Budget Narrative**

#### **Salaries - \$118,600.01**

Costs include personnel costs of 9.5 full time equivalents Northern Middle staff which are directly attributable to one identifiable grant, or those benefitting program activities of more than one program and which are not indirect in nature.

#### **Fringe - \$41,510.00**

Fringe benefits are computed on an individual basis for staff included under salaries (personnel) costs. Items included in fringe benefits consist of health, dental, and vision insurance, disability insurance, unemployment and worker's compensation and mandatory employer match on federal employment taxes, and retirement costs.

#### **Travel \$7,000.00**

Travel includes direct travel costs for staff and is reimbursed in accordance with amounts and limitations specified in the Tennessee "State Comprehensive Travel Regulations," as they are amended from time to time.

#### **Contractual \$6,377,681.07**

##### **Career Service Provider - \$6,168,788.47**

Competitively procured Career Service Provider expenses incurred in the delivery of all assigned duties as they relate to the delivery of services to the Northern Middle LWDA.

##### **One-Stop Operator - \$208,902.60**

Competitively procured One-Stop Operator expenses incurred in the delivery of all assigned duties as they relate to the delivery of services within the One-Stop System of the Northern Middle LWDA to include coordinating services, performance and targeting populations.

#### **Other \$2,400**

Costs including, but not limited to, communication and supplies necessary to carry out the direct activities and responsibilities of one identifiable grant, or those costs benefitting program activities of more than one program and which are not indirect in nature.

#### **Indirect - \$727,465.67**

Administrative costs directly associated with each grant, as well as administrative expenses which are pooled and allocated according to the cost allocation plan to include, but not limited to, salaries, benefits, travel, communication, supplies, contractual services, accounting and auditing, supplies, rent, utilities, computer and related costs of an administrative nature. Costs in this category do not exceed 10% administrative cap.

***C.3 Northern Middle's personnel or contractual expenses (cash or in-kind resources) with estimated the number of hours/days and hourly rate (or portion of FTE and salary) for the time that is expected to be spent on the proposed project by key personnel, contractors, or consultants.***

The Northern Middle Board submits a complete cost allocation plan, which includes the projection of time by position and is approved by the Tennessee Department of Labor and Workforce Development. The Board requires that the Career Service Provider and One-Stop-Operator submit a line item budget and monitors it monthly.

***C.4 Northern Middle's budget description of land or buildings, provide an MAI appraisal or comparable appraisal.***

The Northern Middle Board does not utilize WIOA funding for the purchase of any land or buildings. The Board leases each of the AJC locations.

***C.5 Northern Middle's non-TDLWD funding source as federal, state, local, or private.***

The SF424 details the primary funding sources of the Northern Middle TN Local Workforce Development Board. In addition, the audited financial statements indicate the funding sources of the Board. See pages 16 and 17 in [budget materials](#).



NORTHERN MIDDLE TENNESSEE LOCAL WORKFORCE DEVELOPMENT BOARD, INC.  
SCHEDULE OF EXPENDITURES OF FEDERAL AND STATE AWARDS  
FOR THE YEAR ENDED JUNE 30, 2019

FEDERAL GRANT AWARDS

CFDA Number	Grant ID Number	Program Name	Grantor/ Pass-through Agency	Amount Expended	Passed Through To Subrecipients
10.561	LW08F181QSNAP18	SNAP	USDA/TDLWD	\$ 23,769	\$ 21,892
17.207	LW08P161WP32517	Wagner Peyser - LIFT	USDL/TDLWD	30,450	28,670
17.207	LW08P171WP32517	Wagner Peyser - LIFT	USDL/TDLWD	82,673	78,416
Total 17.207				<u>113,123</u>	<u>107,086</u>
17.225	LW08F172RESEA17	RESEA	USDL/TDLWD	29,981	27,562
17.225	LW08P181RESEA19	RESEA	USDL/TDLWD	86,250	81,558
Total 17.225				<u>116,231</u>	<u>109,120</u>
17.245	LW08F161LATAA16	Trade Adjustment Assistance (TAA)	USDL/TDLWD	17,720	16,631
17.277	LW08P191TEDWGI9	Trade & Economic Transition National Dislocated Worker Grant	USDL/TDLWD	916,845	869,199
<b>WIOA Cluster</b>					
17.258	LW08F181ADULT18	Adult	USDL/TDLWD	23,118	17,684
17.258	LW08P172ADULT18	Adult	USDL/TDLWD	660	595
17.258	LW08P171ADULT18	Adult	USDL/TDLWD	19,099	18,230
17.258	LW08P181ADULT18	Adult	USDL/TDLWD	181,783	171,255
17.258	LW08P191ADULT19	Adult	USDL/TDLWD	1,459,571	1,357,620
17.258	LW08P181ADULT19	Adult	USDL/TDLWD	423,958	395,444
Total 17.258				<u>2,108,189</u>	<u>1,960,828</u>
17.259	LW08P172YOUTH18	Youth	USDL/TDLWD	220,061	197,564
17.259	LW08P173YOUTH18	Youth	USDL/TDLWD	4,544	4,093
17.259	LW08P181YOUTH19	Youth	USDL/TDLWD	100,943	100,943
17.259	LW08P171YOUTH18	Youth	USDL/TDLWD	\$ 660,322	\$ 636,590

SEE ACCOMPANYING NOTES AND AUDITOR'S REPORT.

***C.6 Northern Middle's leveraged funds to include any fee based and/or revenue generated.***

The NMTWB will leverage funding of tenants in the American Job Centers by reducing rent of IFA partners. Tenants are occupants of the American Job Centers, such as Mid-Cumberland Community Services Agency, that do not participate in the IFA process.

***C.7 Northern Middle's in-kind resources, including the methods used to determine their value.***

In-kind services such as the Senior Community Services Program are valued by the wages of similar paid positions in the AJC such as greeters or welcome function staff. In addition, Workforce Essentials provided multiple AJC's with furniture and equipment through non-federal funding. This support of the AJC system is considered in-kind and recorded on the monthly financial reports.

***C.8 Northern Middle's pertinent supporting materials.***

Included in the Budget Information is copies from the June 10, 2020 Northern Middle Board Meeting to include budget review, MPCR evaluation and proposed budget for 2020-2021.

[Click here to view Northern Middle's budget materials](#)

**D. Northern Middle's existing approach/strategies regarding the transfer of Title I workforce funds, including the maximum dollar amount and/or percentage that is authorized to be transferred on an annual basis.**

According to WIOA Section 133, the Board may transfer up to 100% of the funds between the Adult allocation and the Dislocated Worker funding allocation. The request to transfer these funds must be based on areas such as, but not limited to; current labor market information, performance data, comparison and analysis of adult priority of service population compared to dislocated workers either long term unemployed or mass layoffs, recruitment efforts within the AJC system or average cost per participant. The transfer request once motioned by the finance committee of the Board then goes to the full Board for approval. The Northern Middle Board approved transfer of Dislocated Worker funds to be utilized for the Adult program in 2019 to maximize efficiency in operations.

***D.1 Northern Middle's existing method of funds transfer between the adult and dislocated worker funding streams.***

It is the responsibility of the Finance Committee to review financial reports to determine if transfers or set-a-sides are needed. Board staff prepare reports for the committee and Board to justify such requests. The Board transferred up to \$2 million of Dislocated Worker funding in 2019 to be utilized for the Adult program due to the economic conditions at that time. Due to the impact of COVID-19, it is projected that more Dislocated Worker funding will be needed and transfers will be unlikely.

***D.2 Northern Middle's use of incumbent worker training as outlined in WIOA Sec. 134(d)(4)(A)(i).***

The Board can also use no more than 20% of its funds to pay for shared costs of Incumbent Worker trainings according to WIOA section 134(d)(4)(A)(i). For the Board to authorize these funds for Incumbent Worker training the Board takes into account factors such as the employer's competitiveness, characteristics of the employees to be trained, the wage and benefits to the employees and other factors. The guidance the Board uses for Incumbent Worker Training of the Board entitled Consolidated Business Grant Policy, which outlines Apprenticeship, OJT and IWT programs that the Board may/may not authorize. The Board utilized this policy during the 2019 year to assist businesses with funding when CBG funding was interrupted at the Federal level as a means to continue middle Tennessee's overall economic development and momentum. The Board prioritized focus on apprenticeships with Incumbent Worker funds.

***D.3 Funds for transitional jobs as outlined in WIOA Sec. 134(d)(5) in Northern Middle.***

At this time, the Northern Middle Board has not authorized 10% of funding for transitional jobs. However, in light of Covid-19, this strategy may be reviewed to provide additional flexibility for re-employment services.

**E. Northern Middle’s executed cooperative agreements (as applicable) which define how all local service providers, including additional providers, will carry out the requirements for integration of and access to the entire set of services available in the local one-stop system, with respect to efforts that will enhance the provision of services to individuals with disabilities.**

The Northern Middle Board has developed a thorough Memorandum of Understanding with all AJC partners and has include youth providers that have been added to increase the scope and framework of youth services in the NMWA.

[Click here to view Northern Middle's Memorandum of Understanding for Partners](#)  
[Click here to view Northern Middle's Youth Agreements](#)

**F. All service providers, One-Stop Operators and Northern Middle Board staff have been provided copies of Title VI trainings.**

The One Stop Operator as well as the Career Service Provider staff have attended Title VI training. CSP staff and the OSO staff attended Federal Discrimination Laws training. Members of the NMTWB are aware of the requirements to ensure that providers of services throughout the AJC system are trained, but not limited to, areas such as EEO, Conflicts of Interest, and Title VI.

[Click here to view Northern Middle's Title VI training materials](#)

#### **Additional Required Documents**

[Click here to view Northern Middle’s stakeholder involvement](#)

The NMTWB held a public comment webinar for interested stakeholders on June 24, 2020 at 5:00 p.m. No comments were received.

Public Comments from the Tennessee Department of Labor and Workforce Development, as well as AJC State Partners have been addressed and are designated by red text.

[Click here to view the Northern Middle Board's organization chart](#)