

Program Year 2018 - 2020 Local Plan for the Southwest Workforce Development Area

*Serving the Counties of Chester, Decatur, Hardeman, Hardin,
Haywood, Henderson, Madison, and McNairy*



Open for Public Comment January 3, 2019 – January 17, 2019

Submit comments or questions in writing to:

Southwest Tennessee Workforce Board

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Any comments received in relation to the content of the Program Year 2018 - 2020 local plan will be addressed within the plan prior to submission to the TN Department of Labor and Workforce Development (TDLWD).

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Operating Systems and Policies

- A. Through regular, structured, cross-agency meetings of the AJC Management Team, Business Services Team, and Program Operator staff and training meetings, information is shared and projects are coordinated to ensure full agency participation. The AJC Management Team is composed of representatives of partner agencies and is tasked with the responsibility of ensuring quality in service access and provision in the One-Stop Delivery System. Management team meetings are held quarterly to review service provision within the system which makes planning and implementation efforts flow more smoothly. Quarterly Business Services Team meetings are held to address employer needs and coordinate services to employers. Weekly meetings of Program Operator staff are held through web cams to provide on-going training, address any issues, and sharing of information that directly impacts programs administered by SWLWDB.

Job center partners execute a Memorandum of Understanding (MOU) encapsulating the rules, playing field, and goals of the job center system in SWLWD area. While executed by SWLWDB, core programs and partners, via the Job Center Management Team, provide input into its development to ensure positive understanding and pro-active execution.

SWLWDB makes every effort to provide integration of services and offers collaboration and referrals to partners and programs within and outside of the job center system. As for business customers, the Business Services Team and One-Stop Operator Manager work in tandem to refer business customers to the resources and partners that will best meet their needs. The development of community partnerships with other service providers, private businesses, and institutions of higher learning will ensure that referrals and placements are both consistent and reliable. Working with these partners and other core partners will further integrate services to ensure the best leveraging of resources and to prevent unnecessary service duplication. Referrals between partners may transpire through different means to include, but not limited to, warm hand-off, electronic communication/technology, social media, and telephone.

WIOA includes a requirement that partners dedicate funding for allowable infrastructure and other shared costs. (20 CFR 678.700 – 678.760) Each partner financially contributes to the operations of the one-stop delivery system through an Infrastructure Agreement (IFA). All partner contributions are proportionate to the relative benefits received by the partner. Proportionate share, cost allocation methodologies, and any additional considerations are determined at AJC Management Team meetings. Each partner must agree to costs determined for their share at these meetings and sign the IFA denoting approval. Actual costs are billed rather than estimated budgeted amounts. Actual costs are reviewed and if any changes need to be made for any partner, the IFA can be modified at the next scheduled AJC Management Team meeting.

Locations / Services

The eight counties of Chester, Decatur, Hardeman, Hardin, Haywood, Henderson, Madison, and McNairy comprise the SWLWD area. There is one comprehensive AJC in the area:

Madison County (Jackson)

1124 Whitehall
Jackson, TN 38301

The seven remaining counties are affiliate sites located as follows:

Chester County (Henderson)

269 N. Church
Henderson, TN 38340

Decatur County (Parsons)

2039 Hwy. 641 South
Parsons, TN 38363

Hardeman County (Bolivar)

793 Tennessee St.
Bolivar, TN 38008

Hardin County (Savannah)

1080 Wayne Rd.
Savannah, TN 38372

Haywood County (Brownsville)

1151 Tammell Street
Brownsville, TN 38012

Henderson County (Lexington)

340 Natchez Dr., Suite D
Lexington, TN 38351

McNairy County (Selmer)

701-B Industrial Drive
Selmer, TN 38375

Career and other program services provided at each AJC are catalogued in the local Memorandum of Understanding (MOU) for SWLWDB. Career services consist of three types:

1. Basic career services
 - a. Job Center outreach, intake and orientation
 - b. Initial assessment of skills levels (including literacy, numeracy, and English language proficiency)
 - c. Labor exchange services
 - d. Referrals to and coordination with other programs and services
 - e. Provision of workforce and labor market employment statistics information
 - f. Provision of information on ETP performance and related program costs
 - g. Provision of information about local area achievement in performance measures and OSO performance
 - h. Information and referrals to supportive services or assistance
 - i. Provision of information and assistance regarding filing claims for UI

2. Individualized career services
 - a. Comprehensive and specialized assessments of skill levels and service needs of adults and dislocated workers
 - b. Development of an Individual Employment Plan (IEP)
 - c. Group counseling
 - d. Individual counseling
 - e. Career planning
 - f. Short-term pre-vocational services
 - g. Internships and work experiences that are linked to careers
 - h. Workforce preparation activities
 - i. Financial literacy services
 - j. Out-of-area job search assistance and relocation assistance
 - k. English language acquisition and integrated education and training programs

3. Follow-up services – for up to 12 months after first day of employment

Training services are also available to WIOA participants who cannot find employment leading to self-sufficiency. Under WIOA, there is no requirement that a participant must receive career services prior to training services. However, at a minimum, to be eligible for training, an individual must receive an eligibility determination for training services. Training services may include: [Ref: WIOA 134(d)]

- a. Occupation skills training, including training for nontraditional employment
- b. On-the-job training

- c. Incumbent worker training
- d. Programs that combine workplace training with related instruction, which may include cooperative education programs
- e. Training programs operated by the private sector
- f. Skill upgrading and retraining
- g. Transitional jobs
- h. Adult education and literacy services, including activities of English language acquisition and integrated education and training programs
- i. Job readiness training
- j. Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of training

Business services are made available to employers through via the Business Services Team. These services consist of the following:

- a. Certain career services must be made available to local employers, specifically labor exchange activities and labor market information.
- b. Customized business services may be provided to employers, employer associations, or other organizations;
 - Customized screening and referral of qualified participants in training services to employers
 - Customized services to employers, employer associations
 - Customized recruitment events and related services for employers including targeted job fairs;
 - Human resource consultation
 - Services, including but not limited to, assistance with:
 - Writing/reviewing job descriptions and employee handbooks
 - Developing performance evaluation and personnel policies
 - Creating orientation sessions for new workers
 - Honing job interview techniques for efficiency and compliance
 - Analyzing employee turnover
 - Creating job accommodations and using assistive technologies
 - Explaining labor and employment laws to help employers comply with discrimination, wage/hour, and safety/health regulations
 - Customized labor market information for specific employers, sectors, industries or clusters; and
 - Other similar customized services.
- c. Local areas may also provide other business services and strategies that meet the workforce investment needs of area employers; Allowable activities, consistent with each partner's authorized activities, include, but are not limited to:
 - Developing and implementing industry sector strategies (including strategies involving industry)
 - Partnerships, regional skills alliances, industry skill panels, and sectoral skills partnerships
 - Customized assistance or referral for assistance in the development of a registered apprenticeship program
 - Developing and delivering innovative workforce investment services and strategies for area
 - Assistance to area employers in managing reductions in force in coordination with rapid response activities with strategies for aversion of layoffs which may include:
 - Strategies such as early identification of firms at risk of layoffs

- Use of feasibility studies to assess the needs of and options for at-risk firms
- Delivery of employment and training activities to address risk factors
- Assisting employers with accessing local, State, and Federal tax credits

On Demand Access - Required Career Services in Most Inclusive and Appropriate Setting and Accommodations

Carefully planned and coordinated services among all Federally-funded workforce development programs are necessary to achieve the level of integrated service delivery WIOA envisions. This means that all Federally-funded workforce development programs work collaboratively in partnership to optimize the quality of services provided. To assure a high-quality customer experience through aligned and integrated services and to improve service outcomes, the workforce partners in SWLWD area commit to:

- Coordinating the “welcome function” through the OSO making sure the individual is warmly welcomed and offered a menu of the services available
- Sharing customer information and data by requesting the individual register at Jobs4TN.gov
- Closely planning and coordinating services to customers by referring customers to appropriate partners through a warm hand-off
- Training frontline staff to make them more knowledgeable about other workforce development programs and to improve the efficacy of referrals
- Planning and acting strategically based on a common understanding of regional economies, key sectors, workforce demographics and employer needs
- Leveraging program resources where possible to the mutual benefit of both customers and programs

One-Stop Operator (OSO) Information

Mid-Cumberland Human Resource Agency (Workforce Services Division) is the name of SWLWD area’s One-Stop Operator. The appropriate procedures were followed in the procurement process as outlined in Workforce Services Guidance - One-Stop Operator and Career Service Provider Procurement; Effective Date: January 27, 2017, updated February 23, 2018. A Request for Proposal was posted for a designated time period, with public notice being provided through print media and/or electronic means, and with potential bidders being notified by email. Proposals received were evaluated by the Executive Committee of SWLWDB, and a recommendation was made to the full Board. A contract was then entered into between the chosen entity for OSO and SWLWDB and CEOs in the area. The contract outlines the scope of work of the OSO, including the methods for coordinating service delivery between the OSO and operators as: “The Grantee shall establish One-Stop Operator Services pursuant to 20 CFR 678.620(a), including at a minimum, the coordination of service delivery of the required One-Stop American Job Center (AJC) partners, and service providers. Additional roles of the OSO in SWLWD area include:

- a. Conducting ongoing analysis of SWLWD area operations and conducting appropriate problem solving, continuous improvement, and correction action activities
- b. Fostering an integrated organizational structure
- c. Identifying and communicating to all partners and staff the vision, mission and values of SWLWDB
- d. Encouraging partner collaboration which continuously strives to achieve shared ownership for success of the customer and the system
- e. Providing all partners and staff with all information and communication needed for optimal performance of the eight-county area in SWLWDB area

- f. Staff development
- g. Providing informational reports (at least quarterly) to SWLWDB staff
- h. Submission of invoices for reimbursement

The primary role of the OSO is to coordinate the service delivery of required one-stop partners and service providers resulting in a seamless customer flow based on customer's needs. Referrals and shared customer data will be utilized in facilitating co-enrollment of the customer.

B. Local Referral Process

Per SWLWDB's Memorandum of Understanding (MOU) with required partner agencies, referrals do not imply automatic eligibility. The result of the referral is dependent on eligibility determination by each partner based on their unique program guidelines and fund availability. Should the partner agency be co-located in the American Job Center, a warm hand-off will be conducted when referring an individual to a Partner agency. Instances where the Partner agency is not physically located in the American Job Center, Partners will conduct a meeting to setup the following process to conduct referral services in the following manners, whenever possible:

- a. All customers referred for services (via the One-Stop Partners) will receive a written referral with the name, address, and phone number of the Partner organization receiving the customer referral. A copy of the referral form will be given to the customer and to the referring organization (via fax or email).
- b. The organization receiving the referral will make a good faith effort to contact the customer and schedule an appointment within 3 to 7 business days of the date on the referral form.

Referral Tracking

Once a referral is made it is always useful to obtain customer feedback about the referral as well as feedback from each agency to which referrals are made. A follow-up call should be made to each to ensure the referral was effective. Discussion of next steps can also be discussed during this time.

ADA and SBE

Auxiliary aids are available upon request to individuals with disabilities. Partners will ensure services are available to populations with barriers to employment by actively conducting outreach targeting these populations in coordination with one another. The customer will be referred to the most appropriate partner to provide services based on the customer's needs and available services. Targeted populations include, but are not limited to, the following:

- a. Displaced homemakers
- b. Low-income individuals
- c. Individuals with disabilities
- d. Older individuals
- e. Ex-offenders
- f. Homeless
- g. Youth who have aged out of foster care system
- h. Single parents
- i. Long-term unemployment individuals

C. Provision of Adult and Dislocated Worker Employment & Training Activities

The WIOA Adult and DLW formula programs, in coordination with the Wagner-Peyser (WP) Employment Service (ES), are pivotal pieces of the one-stop delivery system, which is the foundation of the workforce system. The system provides universal access to career services to meet the diverse needs of Adults and Dislocated Workers. The Adult and Dislocated Worker programs are required partners in the one-stop delivery system. Adults and Dislocated Workers may access career services and training services in any AJC in SWLWD area. WIOA provides for a workforce system that is universally accessible customer-centered and training that is job-driven.

WIOA programs are required by law to provide a priority or preference for a particular group of individuals. All WIOA programs (Adult, DLW, and Youth) are required to provide priority of service to veterans and eligible spouses of veterans. The Adult program is additionally required to provide priority of service to public assistance recipients, other low-income individuals and individuals that are basic skills deficient, when providing individualized and training services. English Language Learners meet the criteria for “basic skills deficient”.

Statewide Rapid Response Activities

SWLWDB has a staff person who also serves as the Rapid Response Coordinator for the local area who coordinates with the OSO and partners to provide assistance to employers and affected employees through Rapid Response services (Rapid Response Team).

Dedicated staff from all partners mobilizes immediately on behalf of businesses to help the employer navigate through government regulations, take advantage of workforce resources, and coordinate employee expectations. Rapid Response activities include an initial meeting with the employer and follow-up orientations for the workers affected by a potential layoff situation. The purpose of this meeting and the orientations are to share information about available employment transition services for workers that have lost their jobs as a result of a layoff or facility closure.

The Rapid Response Team can help employees with job search assistance while also providing help to the employer by assisting in the management of the workforce reduction and transition of employees while ensuring stability in the community in a positive and productive way.

D. Description and Assessment of Type and Availability of Youth Activities

CSP provider in SWLWD area has the discretion to determine what specific program services a youth participant receives based on each participant's objective assessment and individual service strategy. It is not required to provide every program service to each participant; the following 14 services are available to participants:

- a. Tutoring, study skills training, instruction and dropout prevention services that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential. This includes secondary school dropout prevention strategies that keep a youth in school and engaged in formal learning or training
- b. Alternative secondary school services, or dropout recovery services – Alternative secondary school services assist youth who have struggled in traditional secondary school education. Dropout recovery services are aimed at getting youth who have dropped out of secondary education back into a secondary school or alternative secondary school/high school equivalency program

- c. Paid and unpaid work experiences that have academic and occupational education as a component of the work experience, which may include the following types of work experiences:
 - 1. Summer employment opportunities and other employment opportunities available throughout the school year
 - 2. Pre-apprenticeship programs
 - 3. Internships and job shadowing; and
 - 4. On-the-job training opportunities
- d. Occupational skills training, which includes priority consideration for training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the local area, is an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupation fields at entry, intermediate, or advanced levels. Occupational skills training must meet the following criteria:
 - 1. Be outcome-oriented and focused on an occupational goal specified in the individual service strategy
 - 2. Be of sufficient duration to impart the skills needed to meet the occupational goal
 - 3. Lead to the attainment of a recognized postsecondary credential
 - 4. Meet the quality standards in WIOA Section 123
- e. Education offered concurrently with workforce preparation and training for a specific occupation or occupational cluster – This element refers to the concurrent delivery of workforce preparation activities, basic academic skills, and hands-on occupational skills training in a specific occupation, occupational cluster, or career pathway
- f. Leadership development opportunities, including community service and peer-centered activities, encouraging responsibility, confidence, employability, self-determination, and other positive social behaviors
- g. Supportive services that enable an individual to participate in WIOA activities
- h. Adult mentoring for a duration of at least 12 months, that may occur both during and after program participation
- i. Follow-up services for not less than 12 months after the completion of participation
- j. Comprehensive guidance and counseling provides individualized counseling to participants and may include drug and alcohol abuse counseling, mental health counseling, and referral to partner programs
- k. Financial literacy education includes information and activities such as creating budgets, setting up checking and saving accounts, managing spending, understanding credit reports, and protecting against identity theft
- l. Entrepreneurial skills training assists youth develop the skills associated with starting and operating a small business
- m. Services that provide labor market information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services
- n. Post-Secondary preparation and transition activities, which prepares youth for postsecondary education after attaining a high school diploma or its recognized equivalent.

Meeting the Requirements of In-School Youth Waiver

SWLWDB elected to **not** adopt the waiver approval to move to 50% In-School Youth expenditure rate. With the continuation of the current policy to expend 75% of youth funds on Out-of-School Youth, the Career Service Provider has several process and procedures in place to refer the In-School Youth population to resources throughout the SWLWD area. One of these tools is a Common Intake Form that assesses all

individuals entering the American Job Centers and creating warm handoffs to partnering programs both in-house and throughout our area including, but not limited to, Adult Education, TN Promise and Reconnect. Services for the In-School population are thriving through implementation of programs in local schools such as:

- a. Griffin Program – implemented in Chester County Schools which provides students with career pathway courses through partnership with Jackson State Community College and Jackson TCAT
- b. L.O.O.P. – Local Options and Opportunities Program – in Jackson Madison County Schools which provides students with the opportunity for work experience and training through partnerships with companies such as Stanley Black and Decker and TBDN, as well as others.

Several schools have career coaches on staff who assist students in receiving training and connection to local resources. All school districts in the Southwest area offer some form of career and technical education (CTE) or career pathway courses and the local AJC's provide support for these programs as needed. Dual enrollment courses are available in all schools so students can receive high school and college credit simultaneously. The TN Pathway program will also provide valuable assistance for school districts and their students to increase opportunities and guidance for students as they complete secondary schooling and transition to post-secondary schooling or job training.

E. How Priority Populations Will Be Served

Southwest Local Workforce Development Board's Career Service Provider work to specifically meet the targeted populations' needs. This group includes veterans and spouses of veterans, low-income individuals, basic skills deficient persons, Adults and Youth with disabilities, and individuals who are re-entering society following incarceration. Specialized training has been developed on assisting individuals of diverse geographic and demographic populations consisting of rural and urban communities veterans, recipients of public assistance, other low-income individuals, and individuals who are basic-skills deficient. Services to eligible WIOA Adult Program participants will be provided in the following order:

- a. First, to Veterans and eligible spouses of Veterans who are:
 1. Recipients of public assistance
 2. Low-income, or
 3. Basic skills deficient
- b. Second, to individuals who are not Veterans and eligible spouses of Veterans but are:
 1. Recipients of public assistance
 2. Low-income, or
 3. Basic skills deficient
- c. Third, to Veterans and eligible spouses of Veterans who are not:
 1. Recipients of public assistance
 2. Low-income, or
 3. Basic skills deficient
- d. Fourth, groups established by the Governor and/or Local Board. The following populations experiencing barriers to employment are specifically targeted for services and must be provided priority for training activities per TDLWD Workforce Services Guidance/MOU/IFA:
 1. Individuals with significant barriers to employment
 2. Displaced homemakers
 3. Individuals with no high school diploma
 4. Individuals who are homeless
 5. Unemployed individuals, including long-term unemployed individuals who have low literacy levels

6. English language learner individuals
7. Individuals with disabilities, including youth with disabilities
8. Eligible migrant and seasonal individuals
9. Individuals re-entering the workforce
10. Older individuals
11. Single parents (including single pregnant women and non-custodial parents)
12. Native Americans, Alaskan Natives, and Native Hawaiians
13. Veterans
14. Youth who are in, or have aged out of, the foster care system
15. Individuals facing substantial cultural barriers
16. Individuals within two years of exhausting lifetime eligibility under Part A of the Social Security Act 13

How Local Board Will Determine Priority Populations and How to Best Serve Them

The Workforce Development Board in combination with the CSP has a history of addressing the needs of individuals with multiple barriers to employment, specifically low-income individuals, basic skills deficient individuals and veterans. Even though these population groups have been identified for targeted services, a coordinated response will be developed for other groups that often face multiple barriers to employment such as dropouts and migrant and seasonal farm workers to assure their personal and professional goals are met as well.

F. Provision of Training Services

Under WIOA, training is not entitlement. An Individual Training Account is the mechanism by which payment for training service is made. Local policy defines an ITA to include the cost of tuition, books and fees. Tools, uniforms, supplies, and supportive services are not included in the ITA.

- They must meet provisions of WIOA eligibility regulations
- They must have been interviewed, evaluated, and assumed by a career specialist and be determined to be in need of training services. They must also have the skills and qualifications needed to successfully complete the selected training program.
- They must select a program of training that is directly linked to employment opportunities in the local area as demonstrated by labor market information. If the training area is not high growth, a letter must be obtained from an employer stating that the customer will be hired upon successful completion of training or the client must agree to re-locate to a high growth area for the type of training which is being funded in order to obtain employment after training is completed.
- The training provider must be included on the state-approved list.
- The customer must be unable to obtain grant assistance from other sources or need assistance beyond what is available to pay for the cost of training (currently \$3,500 per 12-month period for two years). A customer must apply for federal financial aid before being granted an ITA since WIOA funds are to be utilized as "last source".

Southwest Local Workforce Development Board Individual Training Account (ITA) Policy is attached as Attachment 1.

G. Customer Choice

ITAs may be used for any training that is also approved by the LWDB. Career Specialists have received the appropriate training in the use of ITAs and the importance of customer choice.

H. Eligible Providers of Services

Classroom training can only be received at approved training facilities and programs. Staff must first check the Demand Occupation/Approved training list to verify that the training is approved. Staff must also verify the provider has been approved and is entered in the state VOS system prior to issuing a voucher for classroom training.

If the customer wants to attend training at a facility or in a program that is not approved, staff will inform the customer and contact the CSP Lead staff person in an effort to begin the approval process. Any questions from a facility regarding gaining approval for their facility or program should be directed to the CSP Lead staff person.

Any changes to State Policy on the local training provider list will be updated when we receive notification from the State through the VOS system. The Workforce Development Board approves the training list on a bi-yearly basis.

A copy of the Eligible Training Provider Process Policy is attached as Attachment 2.

I. Provision of Transportation

As the supportive services policy will be included in SWLWDB's local plan, the Board will have the opportunity to review them when the plan is presented to them at a regular meeting so they will be able to make sure they are consistent, complementary and will help enable customers to achieve their education, training, and/or career goals.

SWLWDB Policy regarding supportive services, including transportation, is attached as Attachment 3.

Vision, Goals, and Implementation Strategy

A. Business Service Strategy

The vision of the SWLWDB and required partners is for Southwest Tennessee to become an area where business and industry thrive based on the availability of a skilled workforce and a robust talent pipeline, and where increasing wealth fuels prosperous communities and a high quality of life. To achieve this vision, the board and partners strive to develop a quality workforce system to meet the needs of area employers and job seekers by:

1. Increasing the skills and knowledge of Southwest Tennesseans to meet the needs of employers now and in the future;
2. Creating career pathways from high school, postsecondary education/training to the workforce; and
3. Eliminating duplication and leveraging dollars to provide more opportunities to the existing and emerging workforce.

The Regional Planning Council, which includes members of the core partners as well as other partners, identifies regional and local in-demand and emerging sectors using available labor market data, strategy meetings, and other data gathering methods. Workforce efforts are then focused on identified sectors through services available through AJC partners, such as the development of career pathways in manufacturing and healthcare. The SWLWDB plans to work with the Business Services Team in creating and implementing effective methods of gathering feedback from employers, such as an employer survey, participation in various business organizations, and various methods of conducting outreach to local employers.

Members of the Business Services Team also conduct outreach in order to educate employers on the services available through the AJC designed, with employers' input, to meet their needs and support talent development. Coordination between training institutions, funding sources, the SWLWDB, and employers ensures that training is available for in-demand occupations in the local area, current and prospective students are aware of various resources for funding training, including those offered by the partner programs, and that resources are leveraged through co-enrollment and referrals to eliminate duplication. Sector studies have also been completed and career pathways developed for both the healthcare and manufacturing sectors.

By supporting strategies under the Governor's Drive to 55 initiative to align education and training with the needs of business and industry and assisting individuals in accessing training opportunities, the SWLWDB is working towards achieving the initiative's goal of 55% of Tennesseans earning a postsecondary credential by 2025. Strategies to improve access to activities leading to a recognized postsecondary credential, academic or industry recognized, thereby prepare workers for in-demand industry sectors and occupations include:

- Approving in-demand training opportunities to be included on the statewide Eligible Training Provider List (ETPL) as WIOA fundable programs;
- Encouraging all job seekers to consider these programs as career options by offering assessments, opportunities, and materials noting local employment opportunities;
- Partnering with employers and high schools on career pathway opportunities in employer-driven training programs;
- Considering options to partner with training providers and neighboring local workforce development areas to "buy" classes offered by training providers so that dislocated workers, adults, and disadvantaged youth have an opportunity to train in the high-demand occupation without a delay due to a waiting list;
- Leveraging assets such as TN Promise, Pathways, and ReConnect in order to increase capacity and provide integrated services to increase skill development and educational attainment of area residents.

Education and training services offered include:

- Needs-Based Scholarships for Postsecondary Training
- Transportation Stipends for Postsecondary Training and Work Experience
- On-the-Job Training and Incumbent Worker Training Grants
- Apprenticeship Programs

Needs-Based Scholarships, issued through Individual Training Accounts (ITAs) for postsecondary training, are managed in the AJCs by members of the Career Development Services Team. After a thorough assessment and verification that the training plan will lead to employability in an in-demand occupation, staff obligate funds, which is documented in Jobs4TN to allow fiscal staff and the SWLWDB to have a clearer picture of funds available and projected expenditures for the program year. A priority of service policy is in place to ensure the most in need receive services first.

While brick-and-mortar AJCs are valued for cost effectiveness, availability of resources to customers, and visibility in the community, Southwest TN also recognizes the need to bring the services to the customers who may not be able to visit the established AJC given the large service area and transportation barriers. In order to bring the services to the people, the TDLWD's Mobile AJC is utilized to serve remote areas and individuals who are unable to commute to one of the AJCs in the region. A Title I staff member has been assigned to coordinate with the Mobile AJC staff to ensure staff from the Title I partner attend Mobile AJC events, providing customers with access to all AJC services. Jobs4TN also allows jobseekers and employer customers to remotely access secure, web-based AJC services such as labor market information, unemployment insurance, and mediated labor exchange.

In order to maximize services to populations with barriers, agencies serving these populations are targeted for outreach efforts such as distribution of marketing materials, participation in events, such as those involving "street teams" or the Mobile AJC, and invitations to participate in AJC events and strategy meetings. Such agencies may include Adult Education, Department of Human Services, Health Department, Housing Authorities, Head Start programs, and Boys & Girls Clubs. The AJC displays marketing materials for core and community partners, and provides materials to be displayed at the partners' sites. Social media accounts are also used to connect with customers and other agencies and inform them of the services available through the AJC. The Business Services Team conducts rapid response meetings to serve workers dislocated through closures or layoffs. Outreach to unemployment claimants regarding AJC services is also conducted via email when contact information is available. A standing committee of the board provides guidance for reaching and serving such populations.

B. Business Service Strategy

The Business Services Team assists in identifying and meeting the needs of employers in existing and emerging industries and occupations by building relationships through local and regional initiatives, identifying means of addressing human resources needs, and promoting and facilitating the use of AJC services such as On-the-Job Training grants, customized training opportunities, industry and sector strategies, apprenticeships, and the availability of Incumbent Worker Training grants. Other services provided to new and prospective companies by the Business Services Team and American Job Center Partners include:

- Pre-screening Applicants – Analyzing and pre-screening job applications based on minimum requirements, then referring qualified candidates to various pre-employment assessments.
- Job Fairs – Facilitating, organizing, planning and finding qualified labor for open positions, including joint job fairs across the West TN region.
- Labor Market Information – Labor Market FAQs can be found on www.Jobs4TN.gov - an online resource that provides access to a wide variety of information about jobs in the local area, such as the average wages for jobs in an area, the occupations predicted to have the most future job openings, the salary expectations for specific occupations, and county unemployment rates.
- Virtual American Job Center – Using the Jobs4TN online website to connect employers to job seekers by listing job orders and making coordinated referrals based on job descriptions.
- On-the-Job and Incumbent Worker Training – Educating employers about the availability of OJT and IWT funds to assist in upgrading skills of new and existing employees.
- Unemployment Insurance (UI) Services – Using Jobs4TN to report layoffs and closures, workers to file claims, job search, and complete weekly certifications, and connect to programs for UI recipients including Re-Employment Services Eligibility Assessment (RESEA).
- Starting Your Own Business Workshop – Attendees learn the skills and information they need to get started, including successful business ownership traits, assessment of the business idea, and the “mechanics” of starting a business – forms of ownership, insurance, financing, and more. Offered in partnership with the TN Small Business Development Centers.

C. Coordination of Education and Workforce Development Activities

The SWLWDB focuses on enhancing training opportunities and providing individuals with the knowledge and resources needed to take advantage of them. Data from the [Economic Analysis of West TN](#) is used as a

foundation to begin discussions and develop partnerships with core programs and educational institutions such as TN Colleges of Applied Technology (TCAT), Community Colleges, and Universities to address educational needs in the area, and achieve the goal of the Drive to 55 initiative, by ensuring the availability of needed training opportunities.

In order to meet the needs of employers and align education and training opportunities with targeted industries and occupations, the SWLWDB also takes advantages of initiatives and opportunities, such as TN Pathways, when possible to partner with workforce, education, training, and employer partners. The TN Pathways initiative, part of a multi-state consortium, the Pathways to Prosperity Network, aims to address the “skills gap” that threatens the preparedness of young Americans entering the workforce. The mission of TN Pathways is to provide TN students rigorous academic/career pathways, which are linked to economic and labor market needs and trends. To yield a pipeline of skilled entry-level workers to address the current and projected skilled worker shortage, the SWLWDB will also:

- Research labor market information and assist in the engagement of employers in the region to determine current and future hiring needs.
- Coordinate with middle schools to understand, develop, and/or enhance career exploration activities for students, beginning in the 7th grade, to assure programs align with industry needs.
- Facilitate interaction between employers and middle/high school teachers, counselors, and/or administration to provide “real world” workforce expectations of business and industry, including pathways, work ethic and soft skills.
- Coordinate with secondary schools and postsecondary institutions to develop career pathways for students that meet the needs of the students and employers.

D. Coordination of Core and Other Workforce Development Programs

The SWLWDB supports the service alignment strategy identified in the State Plan through increased coordination, leveraged funds, seamless customer service delivery, and functional alignment of services. WIOA Title I program funds are braided with other Federal and State programs, such as Trade Adjustment Act, TN Promise, TN ReConnect, Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T), TANF, Senior Community Services Employment Program (SCSEP), Disabled Veterans Outreach Programs, and Re-Employment Services Eligibility Assessment (RESEA) in order to eliminate duplication and leverage dollars to maximize resources and services. The AJCs also strive to provide integrated service delivery by aligning staff by functional teams and providing cross-training on all programs and services offered in the AJC by the various partners. The Welcome Function is coordinated by the One-Stop Operator (OSO). Staff is hired by the OSO and partners are coordinated to fulfill the duties of this function. Those serving in the Welcome Function warmly greet customers entering the AJC and offer an evaluation of service need to identify the services to offer to customers in order to best meet their needs. Staff serving in the Welcome Function coordinates with Career Development Team staff and Business Services Team partners in order to seamlessly deliver career services to all customers. All core partners have staff who serves as a member of the Career Development and/or Business Services Team, whether on-site or off-site by referral or electronic connection. Each program provides a valuable service, and all are connected to reach the desired outcome for the customer. While Career Development Team members focus on performing individualized career services such as skills assessments, developing Individual Employment Plans (IEPs), and case management, the Business Services Team focuses on developing positive relationships with employers in order to identify and address their human resource needs. Staff members are also cross-trained to allow for streamlined services and reduced duplication.

AJC partners, including training providers with program authorized under the Carl D. Perkins Career and Technical Education Act of 2006, also enter into Memorandums of Understanding (MOUs) in order to leverage resources, eliminate duplication of services, and improve effectiveness, thereby decreasing administrative and program costs. The scope of services outlined in this MOU follows Workforce Services Division Policy #7 regarding Service Integration and functional alignment wherein Tennessee’s One-Stop

system shall strive to streamline workforce services functions, prevent the duplication of services and eliminate inefficient practices.

Parties to the MOU agree:

1. To endorse a single customer flow model based on customer need, not program requirements;
2. To refer customers between Partners by methods listed in the MOU;
3. To authorize the sharing of customer data and information in order to facilitate co-enrollment and case management across programs and funding streams; and
4. To participate in joint planning of this MOU, plan development, and modification of activities to accomplish:
 - Accessibility of the Partners' applicable services to customers through the One-Stop Service Delivery system
 - Participation in the operation of the One-Stop Service Delivery system, consistent with the terms of the MOU and requirements of authorized laws
 - All Partners and staff are adequately cross-trained as a result of their participation in capacity building and staff development activities
 - Continuous partnership building by requiring inclusion of all Partners involved in the One-Stop System
 - Continuous adaption to state and federal guidelines
 - Responsiveness to local and economic conditions, including employer needs
 - Meet common data collection and reporting needs via Jobs4TN
 - Involvement in special grant and/or pilot projects that impact a Partner's shared staffing resources
 - Co-branding through inclusion of "AJC identified" or "American Job Center" on any joint products, programs, activities, services, facilities, and materials used by the combined Partnership of the System

New Plan Element – Workforce and Correction Partnership

A. Local Board Partnerships

The SWLWDB supports the goal of improving labor market outcomes of formerly-incarcerated population often known as justice involved. To do so, the SWLWDB will continue to establish or enhance partnerships with re-entry service providers, parole and probation field offices, employers, community-based organizations, faith-based organizations, labor organizations, vocational training providers, and social enterprises that serve the formerly incarcerated and justice-involved individuals. The SWLWDB recognizes the value of all partners, especially community and faith-based organizations who have firsthand expertise in understanding and providing impactful services to the re-entry population. The One-Stop Operator (OSO), on behalf of all partners of the AJC, will reach out to the various organizations that can assist in this effort. The SWLWDB and AJC are actively working with local Sheriffs and county jails in seven of the eight counties to provide re-entry services for currently incarcerated inmates to ensure a smooth transition into the labor force upon release. The jails offer a network of community-based organizations already working with inmates for transition into society. By coupling these efforts, justice involved individuals will have a much better chance for success and reduce the recidivism rates for this population. The programs vary to meet the needs of the area and provide seamless, integrated and effective services to both current justice-involved individuals and those formerly incarcerated. Although the AJC OSO can arrange for partners to provide basic career services, including, but not limited to, labor market information, career pathway guidance, and job search assistance, etc., the SWLWDB also recognizes that justice-involved individuals may need mental health and faith-based programs. The OSO will seek to coordinate with community-based organizations currently working with justice involved individuals to blend and braid services. Additionally, the OSO will seek out new community-based organizations to provide any void in services.

B. Assessment of Need and Population Size

Overview of Size and Demographics of Supervised Population. The following information was included in the TN Jail Summary Report, October 2018, as of October 31, 2018 – One Day Snapshot.

Facility	TDOC Back-up	Local Felons	Other Convicted Felons	Federal & Others	Convicted Misdemeanor	Pre-Trial Felony	Pre-Trial Misdemeanor	Total Jail Population
Chester	23	3	0	1	6	25	6	67
Decatur	23	0	0	0	2	15	16	54
Hardeman	177	10	3	0	20	68	10	128
Hardin	20	9	6	1	9	72	377	154
Haywood	0	52	0	13	21	68	24	178
Henderson	85	12	14	6	54	47	28	246
Madison	41	25	0	1	126	150	134	477
McNairy	11	3	0	0	3	49	44	110

Assessment of the Types of Services Needed

In addition to the traditional career services offered by AJC partners, employing individuals with barriers requires “hard” skills and experience to get a job and keep that job. Title I partners can provide ITAs and supportive services for occupational skills training. Southwest Local Workforce Area is finalizing a partnership agreement to meet the needs of the manufacturing industry with area Tennessee Colleges of Applied Technology (TCAT) to provide the Manufacturing Skills Standard Council (MSSC) Certified Production Technician (CPT) training program. The aim is to furnish life skills utilizing our current program to the same group that will be taking the (CPT) Certified Production training. We hope to have this program up and running in the spring. In the past 4 years our re-entry programs, Inside –Out Dad and Responsible Mom have graduated 179 inmates, 135 men and 44 women. Of those released, the recidivism rate was under 15%.

Number of Individuals Released Annually from State Prison

According to the TN Department of Correction [Fiscal Year \(FY\) 2018 Statistical Abstract](#), releases increased by 423, or 3.2%, from FY 2017 to FY 2018. In FY 2018, there were 13,538 releases. Of those, 2,428 were released from local jails for reasons other than death. In West TN, a total of 2,974 individuals were released. Also in FY 2018, 24,323 individuals were admitted to some type of community supervision (probation, parole, or community corrections), while 23,792 individuals were released from community supervision.

Number Formerly Incarcerated Served for PYs 15-18

In the past 4 years our re-entry programs, Inside–Out Dad and Responsible Mom have graduated 179 inmates, 135 men and 44 women. Of those released, the recidivism rate was under 15%. We have conducted both men’s and women’s classes in seven of our eight county jails. Southwest Local Workforce Area hopes to start the program in Hardin County this spring. This will have our entire region covered.

Ways Partners Will Facilitate Information Sharing

The One-Stop Operator provides a mechanism for communication between all program partners. To date, the Sheriff's Offices has provided documentation for eligibility for current inmates who often do not have a current driver's license, etc. The AJC has also contacted Probation and Parole for necessary information.

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

Existing and Prospective Partnerships to Coordinate Re-Entry

Not only are all participants in our re-entry program registered in Jobs4tn, we also maintain a close relationship with all partners and share information with them on a regular basis. In several counties we have prospective employers meet with the classes to talk about their needs in employees. Several of those have been hired upon release from being incarcerated. This has been one of the most successful options for our participants.

Current Level of Service and Plans to Modify

The Southwest TN region has been working with justice involved programs for four years and currently has plans in place to provide additional training classes through the Tennessee College of Applied Technology. We have plans to expand those training classes into all eight of our counties.

Identification of Potential Barriers and Supportive Services

Multiple barriers await a justice involved individual as he/she tries to put their life back on track. Through current efforts, the SWLWDB has found the timing of release to be a real issue. Some inmates are released prior to finishing the program, some months afterwards. Most jails will not release them unless they have a "plan" for housing and a job. Generally, the faith-based and community-based organizations work with them on housing. Title I can provide transportation for schooling and work experience, but only for an approved period of time. Referrals are made to TANF for childcare. Title I can also provide tools and uniforms and other work-related expenses.

Outreach and Recruitment Strategies & Collaboration with Parole and Probation Partners

Outreach and recruitment of participants for the Inside-Out Dad and Responsible Mom programs start with the county mayor, sheriff, Business Service Team, AJC Partner staff and training provider. Once all parties agree to the project, informational brochures are provided to the inmates and staff meets individually to determine if they are a right fit for the program through initial assessment and screening.

Intake and Case Management Needs

Case Managers work closely with all applicants to obtain current information about the education and training they have received. The SWLWDB acknowledges that those who received education and training during incarceration often have more difficult time providing information to help build the best employment plan possible. Case Managers will assist the justice involved individual by reaching out to Probation and Parole or directly to the facility or training provider to gather the information, such as transcripts of credentials.

D. Relationship to Regional Labor Market Needs, Sector Pathway Programs, and Partnerships

Development of Resources and Information for Distribution

Informational materials are readily available on all of these programs for the federal Work Opportunity Tax Credit and Federal Bonding. The Business Services Team currently provides information to employers on these topics as a standard part of their presentation. Through team meetings hosted by the One-Stop Operator, Business Services Representatives are made aware of the various supportive services offered by partners, CBOs, and other organizations to assist in hiring formerly incarcerated individuals. They provide this information to employers as needed, while AJC staff share the information with applicants.

Interface with Regional Sector Pathways Efforts

Manufacturing continues to be a strong regional sector pathway throughout West TN. To facilitate increasing the number of individuals trained and available for work in manufacturing, Southwest Local Workforce Development Area plans to initiate a Re-Entry Advanced Manufacturing Program. TCATs and/or the community college provide onsite instruction for currently incarcerated individuals in Safety, Quality, Manufacturing Processes and Maintenance Awareness. Formerly incarcerated individuals are eligible for ITAs in various other sectors, including healthcare, transportation and business.

Staff and Training Needs of Regions, Boards, and Partners

All three areas in the West TN Region offer very different re-entry programs. Leadership provides periodic reviews of programs at the Regional Planning Council (RPC) meetings. The RPC plans to convene a meeting of “practitioners” throughout the region to discuss the details, challenges and successes. If additional training needs are determined beyond the region, we will seek the assistance of the TDLWD to identify training resources.

Identification of and Engagement with Employers and Partnerships

The SWLWDB utilizes our Business Services Team which includes our Business Services Coordinator, representatives of Voc-Rehab, Adult-Education, ECD Title I Team Lead, Wagner-Peyser Team Lead, One Stop Operator, Local Workforce Board staff, and other interested partners. These members indicated their companies would give justice involved individuals an opportunity on a case-by-case basis. All partners are included in the planning process where priority industry sectors and occupations are identified. Further, the One-Stop Operator is aware of the priority and distributes all job order, job fair, etc. information to all partners. Further, the Business Services Team in Southwest TN has developed very good relationships with the employer community. During visits, they discuss the possibility of hiring ex-offenders or currently incarcerated (where work release programs are established). They explain the benefits of Transitional Work Experience, OJT, WOTC and Federal Bonding.

Shared Case Management – Services/Referrals and Support Services

The One-Stop Operator monitors case management in the Virtual One Stop system to ensure that all participants, including those serving formerly incarcerated and justice involved individuals, receive shared case management services from all appropriate partners. Partners are accustomed to the “it takes a village” methodology when working with individuals with barriers.

Performance Goals and Evaluation

To remain a high performing board, the SWLWDB will follow the factors developed by the State Board:

1. communicate a vision;
2. build strategic partnerships; and
3. keep the local workforce system accountable

The SWLWDB's vision, developed through strategic planning with workforce system stakeholders, is for Southwest Tennessee to be an area where businesses can find skilled workers, improve the economy of West Tennessee and the residents enjoy productive careers. To achieve this vision, the SWLWDB focuses on aligning resources and partners to support key priorities. Locally, the SWLWDB's American Job Center partners provides guidance for enhancing services to jobseekers and employers through the AJCs, while the Business Services Team, along with the One-Stop Operator enhance strategic partnerships and align resources. Regionally, the Regional Planning Council, including representatives from all of the core partners, develops the Regional Plan which includes methods for enhancing services. The cooperation of the leadership of the core partners is echoed among front-line staff at the AJC who implements the vision and directives of the SWLWDB and Regional Planning Council by striving to align by functional purpose and thereby avoiding program silos.

Furthermore, the SWLWDB collects and analyzes data to evaluate the one-stop system. The AJCs utilize the Virtual One-Stop (VOS), or Jobs4TN, in order to collect, measure, review, and analyze data, including data regarding required performance measures. The system also allows for data regarding caseloads, Center traffic, case notes, exit status, and many other items to be generated into reports for specified time periods, which are shared with staff and stakeholders.

Performance

A. Projected Local Service Levels

Expectations are to increase traffic flow in the AJCs through outreach methods such as:

- Word of mouth
- Utilization of social media
- Community events
- Referrals for program outreach

In order to build trust and strengthen the participant's relationship with their Career Specialist, CSP staff will meet with a participant where they are, on their terms. Career Specialists reach out to participants by the medium they prefer and is most convenient to them. In addition, Career Specialists will frequent locations of complementary service providers, such as Adult Education, DHS, UT Extension Offices, etc. in order to increase traffic flow and market the services provided through the AJCs.

A participant-focused model that is both strengths-based and data-centered will be utilized in order to best provide services to underserved populations and employers. Career Specialists will work directly with each participant on a one-on-one basis to provide specialized services to remove barriers towards success. This individualized approach is further tailored to the specific needs of traditionally underserved participants by utilizing research, labor market information, and relationships established within the community to identify specific needs and solutions. While the ultimate goal in providing services is to help individuals pursue post-secondary education, attain a credential, and acquire gainful employment, this approach works to end negative cycles of poverty, unemployment and lack of education. By providing support to a participant, future opportunities for the participant are expanded.

Projected goals for enrollments through WIOA are allocated to each Career Specialist quarterly. The following chart denotes projected numbers by county/AJC for PY18-19:

Chester	Decatur	Hardeman	Hardin	Haywood	Henderson	Madison	McNairy
77	24	115	51	106	53	192	90

B. Negotiated Local Levels of Performance

The Primary Indicators of Performance for the WIOA Title I Programs, WIOA Title III, Wagner Peyser and WIOA Title II, Adult Education will be used to measure and evaluate performance for the local area. These are federal performance indicators negotiated with the U.S. Department of Labor and the U.S. Department of Education.

Performance indicators for PY 17-18 are attached as Attachment 4.

In order to ensure local performance goals are met, performance goals will be reviewed by the OSO, CSP Team Lead, management staff, and Board staff on a quarterly basis. SWLWDB members will be updated on performance goals at each Board meeting.

Career Specialists have had intensive training regarding performance measures to maintain successful outcomes.

Negotiated performance measures for PY 2019 are attached as Attachment 5.

Technical Requirements, Assurances, and Evaluation

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

An integrated, technology-enabled intake and case management information system under WIOA (§ 679.560(b)(20)).

The Jobs4TN system is the management information system used to case manage participants for the programs listed below. Each employee is required to sign a user agreement stating that personally identifiable information is to be kept confidential and only used for the purpose of job duties. Each AJC also utilizes the Greeter feature to track the number of customers using the AJC. Using this system for the majority of WIOA programs allows programs to share information and reduce duplication of data entry. Information needed to calculate all common indicators of performance resides in this system. Reports can be generated and shared with program staff to ensure that performance targets will be met. The State office has held core partner meetings and has established performance groups that will routinely meet and report out all core partner performance. This approach will allow all partners to share concerns and keep a close eye on performance as a system. TANF and Vocational Rehabilitation use other case management systems but all WIOA partners will work to share information across these systems in order to better serve participants.

- Title I: Adult, Dislocated Worker, Youth
- Title II: Adult Education and Family Literacy
- Title III: Employment Programs under Wagner-Peyser
- Unemployment Insurance
- Trade Readjustment Assistance (TRA)
- Trade Adjustment Assistance (TAA)
- Job Counseling, Training, Placement Services for Veterans

- Migrant and Seasonal Farmworkers
- Community Services Block Grant (CSBG)
- Senior Community Services Employment Program (SCSEP)

In addition, the above partners, as parties to the MOU, agree to work cooperatively to share data to the extent necessary and as permitted or required by applicable statutes or regulations.

Access to services, including in remote areas, through the use of technology and other means.

In accordance with the “direct linkage” requirement under WIOA, services are provided using technology available at the AJCs. Jobs4TN allows both job seeker and employer customers to remotely access secure, web-based AJC services such as labor market information, unemployment insurance, and mediated labor exchange. On-site and off-site partners also routinely make referrals via phone, email, or Jobs4TN.gov for the unemployment insurance program. Information regarding AJC services is also made available on the system's website and social media pages. The Mobile AJC provides access to services for individuals in remote areas.

B. Physical Accessibility

As detailed in the MOU, partners agree that they will comply fully with the non-discrimination and equal opportunity provisions of: (1) Workforce Innovation and Opportunity Act Section 188, (2) Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq), (3) Nontraditional Employment for Women Act of 1991, (4) Civil Rights of 1964 Title VI (as amended), (5) Rehabilitation Act of 1973 Section 504 (as amended), (6) Age Discrimination Act of 1967 (as amended), and (7) Education Amendments of 1972 Title IX (as amended). Parties to the MOU must also adhere to requirements imposed by, or pursuant to, regulations implementing these laws – including but not limited to 29 CFR 37-38.

All partners also agree that they will not discriminate in their employment practices or services on the basis of gender, gender identity and/or expression, age, race, religion, national origin, disability, veteran’s status, or on the basis of any other classification protected under state or federal law. Partners assure that they have policies and procedures in place to address these issues, and that such policy and procedures have been disseminated to their employees and otherwise posted as required by law. All partners also cooperate with compliance monitoring that is conducted to ensure that all AJC programs, services, technology, and materials are physically and programmatically accessible and available to all. Additionally, staff members are trained to provide services to all, regardless of range of abilities, mobility, age, language, learning style, or comprehension or education level. The attached Title VI training is offered to the One-Stop Operator, service providers, Board and Board staff. Title VI training is attachment 6.

Reasonable accommodations are provided for all aspects of a customer’s experience in the AJCs, such as during application/registration for, and provision of, aid, benefits, services, and training. Accommodations are made according to the individual's need in order to ensure that he / she receives equal benefits from the program or activity, will be able to compete fairly in educational work settings, and in general, to have an equal opportunity. If needed, documentation of the individual's need for accommodations is obtained and maintained in a separate, secure location. In order to inform customers of the accommodations available, the following tag-line, or one similar, is included on all recruitment brochures and other outreach materials including print, newspaper ads, television, and radio commercials produced by the local workforce development board: “EOE. Auxiliary aids and services available upon request. TDD# 711.” Accommodations available include a large keyboard and calculator, a trackball mouse, software for individuals with visual impairments, Language Line for interpretation or translation services, extended time and readers for assessments, large-print and Spanish Registrant Handbooks, and IntelliKeys keyboards. NV Access Technology (www.nvaccess.org) has been installed for individuals with visual impairments. NV Access reads aloud what’s on the computer screen and gives the user a unique set of intelligent tools for navigating and

accessing web pages and all screen content, is also available at the comprehensive center in Jackson. The system utilizes a TDD/TTY number for all centers, 711, and a TDD/TTY phone is available at the comprehensive center in Jackson. Referrals are made for additional services not offered in the AJC.

C. Fiscal Management

- a. Identify the entity responsible for the disbursement of grant funds [WIOA Sec. 108(b)(10)].

The SWLWDB was selected as Administrative Entity/Fiscal Agent for the WIOA grant funds by a Consortium of Chief Elected Officials (CEO). As the designated entity, the SWLWDB, in accordance with Sec. 107(d){12}{B}{III} shall disburse the grant funds for workforce investment activities at the direction of the board, immediately upon receiving such direction from the local board. §679.420 states that the designation of a fiscal agent does not relieve the chief elected official or Governor of liability for the misuse of grant funds. If the CEO designates a fiscal agent, the CEO must ensure this agent has clearly defined roles and responsibilities, therefore, CEOs enter into an agreement with the SWLWDB

- b. Competitive procurement processes used to award the subgrants and contracts for WIOA Title I.

The SWLWDB follows the appropriate procurement and purchasing guidelines as outlined in the attached Purchasing and Procurement policy (Attachment 7). When procuring a One-Stop Operator and Title I Service Provider, the Board follows the guidelines for formal solicitations as listed in the attached policy (Attachment 8). Consistent with WIOA Sections 107(d)(10) and 121(d), the Workforce Services Policy regarding One-Stop Delivery and Design System, paragraph (D) of the Local Board Responsibilities section, and in accordance with the Regional Planning Council, the SWLWDB, with the agreement of the chief elected officials for the local area, shall designate or certify one-stop operators as described in section 121(d)(2)(A). In order to conduct a competitive process for the selection of a one-stop operator and Title I Service Provider in accordance with 121(d)(2)(A), the Board, with the agreement of the CEOs, will issue, or will select a third-party contractor to issue, a Request for Proposals (RFP). The RFP will be posted for a designated time period, with public notice being provided through print media and / or electronic means, and with potential bidders being notified of the release by email. Proposals received shall be reviewed by a committee approved by the Board and CEOs, or by the selected third-party contractor. The review committee or contractor shall make a recommendation to the Board for selection of the Operator and Title I Service Provider. The selected Operator and Service Provider, which may be separate entities, shall enter into a contract(s) with the Board and CEOs as developed by the fiscal agent.

- c. Describe how the local area will meet the required 50% minimum participant cost rate (MPCR).

Per TN WIOA 17-11 Minimum Participant Cost Rate, SWLWDB shall ensure a minimum of 40 percent (40%) of WIOA Title I formula funds allocated to the Board (WIOA Section 128(b)(4) and 133(b) is expended on allowable participant costs under WIOA funded services per WIOA Section 129(c)(2), WIOA Section 134, TEGL 19-16 and TEGL 21-16. *Minimum Participant Cost Rate (MPCR) will be adjusted accordingly when State Policies are changed regarding the percentage.*

Qualifying expenditures under this policy are those that represent the cost of services for Title I (Adult, Dislocated Worker, and Youth) participants that do not include administrative, personnel or operating expenditures and are listed below:

A. Qualifying Activities

In order to determine if the cost of an activity should be considered a direct participant expense (i.e., fundable activity) that will count towards the 40% MPCR, the following factors will be considered:

- a. If the activity is listed on Attachment 9 of this guidance, the activity qualifies as a direct participant cost to be included in the MPCR calculation.
- b. If the activity is not listed, conduct the analysis below:
 - But for the WIOA Youth program, in order to receive this service/activity, would the participant have to incur and out-of-pocket personal expense? If the answer is yes, count the activity as a direct participant expense. (Ex: There are no free or available financial literacy classes offered in the community, if not for the youth program offering the class, the individual would have to incur expenses to participate in a class.)

B. Youth Services

- a. Tutoring, study skills training, instruction, and dropout prevention services (20 CFR 681.460 (a)(1))
- b. Alternative secondary school services or dropout recovery services (20 CFR 681.460 (a)(2))
- c. Paid and unpaid work experience (20 CFR 681.600)
- d. Occupational skills training (20 CFR 681.540)
- e. Education offered concurrently with workforce preparation and training for a specific occupation (20 CFR 681.630)
- f. Leadership development opportunities (20 CFR 681.520)
- g. Supportive services (20 CFR 681.570)
- h. Adult mentoring (20 CFR 681.490)
- i. Follow-up services (20 CFR 681.580)
- j. Comprehensive guidance and counseling (20 CFR 681.510)
- k. Financial literacy education (20 CFR 681.500)
- l. Entrepreneurial skills training (20 CFR 681.560)
- m. Services that provide labor market information (20 CFR 681.460 (1)(13))
- n. Post-secondary preparation and transition activities (20 CFR 681.460 (a)(14))

C. Adult and Dislocated Worker Services

- a. Career Services defined (20 CFR 678.430) as costs directly benefiting participants (i.e. assessments) and does not include salaries of staff providing the assessments.
- b. Training services (20 CFR 680.200 through .230 and 20 CFR 680.300 through .350).
Types of training services that may be provided include:
 - 1. Occupational skills training, including training for nontraditional employment;
 - 2. On-the-job training;
 - 3. Incumbent worker training;
 - 4. Programs that combine workplace training with related instruction, which may include cooperative education programs;
 - 5. Training programs operated by the private sector;
 - 6. Skill upgrading and retraining;
 - 7. Entrepreneurial training;
 - 8. Job readiness training provided in combination with the training services described in any of clauses (a) through (g) or transitional jobs;
 - 9. Adult education and literacy activities, including activities of English Language acquisition and integrated education and training programs, provided concurrently or in combination with services provided in any of clauses (a) through (g); and
 - 10. Customized training conducted with a commitment by an employer or group of employers to employ and individual upon successful completion of the training.

c. Supportive Services (20 CFR 680.900)

The base year for this policy is program year July 1, 2017 through June 30, 2018. Calculation of MPCR will be conducted by dividing the Total Qualifying Expenditures incurred by the Total Cumulative Expenditures – Program Only (as reported on the Monthly Expenditure Report).

Continuous Improvement steps listed below will be utilized in meeting the MPCR:

- a) This policy will be maintained to ensure compliance with the 40% minimum expenditure requirement including determination of the qualifying expenditures.
- b) The MPCR for current Program Year will be calculated and reported to TDLWD utilizing the attached MPCR Calculation Template quarterly. Once completed, the information will be emailed to workforce.board@tn.gov by the close of business of the last day of the quarter.
- c) Should the LWDA fall below the 40% MPCR, it is required that the issue be addressed and a plan must be developed that identifies measures to be taken in order to reach the MPCR by the end of the Base Program Year 2017 (June 2018).
- d) The 40% expenditure rate will be reviewed quarterly by the LWDB. To provide for continuous improvement, a brief narrative will be submitted along with the quarterly report explaining why the expenditure rate was not attained in instances when the area falls below the 40% MPCR. Should the local area perform the 40% rate for three consecutive quarters, SOUTHWEST LWDB must submit a board-approved Corrective Action Plan providing a detailed analysis of the inability to attain a minimum 40% training expenditure rate. This Corrective Action Plan must include at a minimum:
 - a. Local Board approved action steps to meet the minimum required rate
 - b. Timeline for meeting the 40% minimum required rate
 - c. Any measurable benchmarks or indicators the plan will ensure the LWDA is on track to meet the expected outcome
 - d. Acknowledgement by the LWDB that the area is subject to remedies for non-compliance as outlined in 2CFR 200.207 and 200.338 until the MPCR is attained.

When meeting or exceeding the MPCR, SOUTHWEST LWDB will strive to maintain and/or improve current rate of expenditures in order to meet the State proposed regional MPCR of 50% or greater. It is intended that regions meet the regional MPCR no later than the end of Program Year 2018 (June 2019).

Action:

Forty percent (40%) of program costs of each formula contract received by SOUTHWEST LWDB is designated on the front end to be spent on participant training. This number is made a part of each formula contract assigned to the Service Provider and designated as “participant training costs”. The Service Provider has been given copies of this policy and has been informed of the importance of meeting this requirement.

Board staff has requested that monthly reports from the One-Stop Operator/Service Provider denoting total expenditures versus qualifying expenditures toward the MPCR be submitted. SOUTHWEST LWDB staff will also keep track of training-related expenditures through monthly review of invoices submitted by the One-Stop Operator for reimbursement.

In the event of failure to meet the 40% MPCR, a corrective action plan denoting action steps and a timeline for meeting the 40% required rate will be submitted and approved by the SOUTHWEST LWDB. In addition to the action steps and timeline, the plan will also address the following:

- Measurable benchmarks/Indicators to ensure LWDA is on track to meet expected outcome
- Acknowledgement by the LWDB that area is subject to remedies for non-compliance as outlined in 2CFR 200.207 and 200.338 until the MPCR is attained
- Any other information beneficial for state review and comment

D. Transfer of Title I Workforce Funds

- To transfer funds between the adult and dislocated worker funding streams.

Local situations differ from year to year depending upon a number of factors, e.g., employer and job seeker needs, amount of our allocation, locally and regionally-designed initiatives, etc. Therefore, the decision to transfer money will be determined on an as needed, timely basis and done in accordance with any and all policies that govern this option at the time of the transfer.

- To use funds for incumbent worker training as outlined in WIOA Sec. 134(d)(4)(A)(i).

Fortunately SWLWD area has always had additional funding for Incumbent Worker Training to meet the needs of employers. Should this situation change, SWLWDB would request to utilize formula funds as outlined in WIOA Sec. 134(d)(4)(A)(i) for Incumbent Worker Training upon available funding.

- To use funds for transitional jobs as outlined in WIOA Sec. 134(d)(5).

Again the strategy to determine the use of funds for transitional jobs will depend upon customer demand/need. Furthermore, depending upon total allocation, it may be necessary to weigh the need for this activity vs other work-based learning activities.

E. Cooperative Agreements

See attachment 10 for Cooperative Agreements

F. Title VI

See attachment 6 for Title VI training

Attachments

1. Individual Training Accounts Southwest LWDB – WIOA (17-11)
2. Eligible Training Provider Southwest LWDB – WIOA (18-1)
3. Supportive Services Southwest LWDB – WIOA (17-25), Change 1
4. Performance Indicators
5. Negotiated Performance Measures for PY 2019
6. Title VI Training
7. Property Guidelines Southwest LWDB – WIOA (17-3)
8. One-Stop Operator and Career Services Provider Procurement Guidelines
9. MPCR Qualifying Expenditures
10. Cooperative Agreements
 - a. Interlocal Agreement
 - b. Partnership Agreement
 - c. SWLWDB and VR
11. Organizational Chart with Staff and Title