



STATE OF TENNESSEE  
**DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT**  
DIVISION OF WORKFORCE SERVICES  
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Nashville, TN 37243-1002  
(615) 741-1031

January 5, 2016

Ms. Jennifer Young  
Central Procurement Office  
Department of General Services  
3<sup>rd</sup> Floor, WRS Tennessee Tower  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

Dear Ms. Young:

Please find attached a revised 2015-16 Department of Labor and Workforce Development (TDLWD) Fiscal and Program Monitoring Plan to add/remove the following:

- Confirm that Attachment A represents the total sub-recipient population and attachment reflects all active contracts with the sub-recipients listed in Attachment A.
- Removed reference to 1/3 and 2/3 referenced on Page 8 and the calculations for 1/3 2/3 on Page 10 for the number of contracts to be monitored.
- Replaced 1/3 and 2/3 with language in Section 9.1 of CPO Policy 2913-007.
- Added Attachment E. Subrecipient Contracts issued after October 1, 2015.
- Removed five (5) repeated Fiscal Questionnaires, three (3) Adult questionnaires and three (3) Dislocated Worker Questionnaires.

For additional information, please contact me at (615) 741-1031 or Rubka Tamerat at (615) 741-6786.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ivan Greenfield".

Ivan Greenfield, Grants and Budgets Director  
Division of Workforce Services

IG:RT:RK

*Monitoring*

Plan

October 2016

Prepared by

Tennessee Department of Labor and Workforce Development

Nashville, TN

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## **PREFACE**

This monitoring plan has been developed to be a reference manual for statewide Workforce Innovation and Opportunity Act (WIOA) programs and American Job Centers (AJCs) monitoring activities. This manual is intended as a guide and does not limit the reviewers in number, scope, or format.

This manual contains the required Policy 2013-007 elements and EEO information; including waivers approved for the previously funded WIA funded programs through 2017. Also included in this manual is the monitoring process and the program requirements for the Senior Community Service Program (SCSEP).

## **INTRODUCTION**

The Workforce Innovation and Opportunity Act (WIOA) emphasizes program performance at State and local areas level. Monitoring at both levels will ensure that proper systems are in place, being followed, and meet legal requirements. To accomplish this, the State has prepared this monitoring guide which includes onsite and desktop monitoring systems, corrective-action procedures, follow-up procedures, and other items.

The reason for emphasizing monitoring is to help reduce possible audit exceptions, sanctions, and unallowable costs (which may need to be reimbursed to the Federal government). Through the use of established monitoring procedures, both State and local areas may minimize such problems through early detection and correction.

The Tennessee Department of Labor and Workforce Services (TDLWD) Division of Workforce Services will continue to rely on the Program Accountability and Review (PAR) team to conduct subrecipient monitoring reviews of WIOA contractors. All contractors will be reviewed at least once each year with the exception of National Dislocated Worker Grants which must be reviewed twice each year.

## **GRANT MONITORING PURPOSE**

Monitoring can serve many purposes. Although it is most common to monitor for compliance with Federal and grant requirements, monitoring should be viewed as a multi-faceted management activity directed at achieving program goals and financial requirement standards. Monitoring thus becomes a program-identification linking planning, program design, implementation, technical assistance, and evaluation and financial requirement standards. The purpose of this review guide is to examine compliance with WIOA programs under the TDLWD Workforce Services Division. These programs are provided at American Job Centers statewide in accordance with each program's policy regarding agreements, board membership, appointment procedures, including areas of representation, responsibilities, and activities.

In accordance with WIOA Section 184 (a)(4) each Governor of a State shall conduct on an annual basis onsite monitoring of each local area within the State to ensure compliance with the uniform administrative requirements.

To conduct a thorough review, PAR team monitors will examine both fiscal and programmatic aspects at Administrative Offices and/or American Job Center Comprehensive/Local Workforce Development Areas (LWDAs). This updated guide is to be used by PAR, along with Uniform Administrative Review instruments, to review program delivery, expenditures and invoices connected with contracts and activities.

Prior to the monitoring reviews, PAR should receive a copy of the contracts from the fiscal division. As far as locations of the monitoring reviews, a fiscal review and a programmatic review may be conducted at the Administrative Offices. However, a programmatic review would be incomplete without the monitors observing “first-hand” the delivery of participant services occurring in this process at American Job Centers.

The opportunity, to deliver employment and training services in an American Job Comprehensive Center, depends on the proposed provider’s designation or certification as an Eligible Service Provider (WIOA Section 122 and Section 123). Eligible providers are identified not only according to performance but also by means of the State working in collaboration with Local Workforce Development Boards.

## **GRANT MONITORING PROCESS**

**Notification Process:** The Program Accountability Review team will provide written notice, to each entity being monitored, at least ten days prior to a review being conducted. The written notice will inform the entity of: the dates for the review, which programs will be reviewed, the contact number of contracts that will be examined, and, the estimated time of arrival.

If the date(s) identified in the written notification is not convenient for the entity being monitored, the entity must contact the monitors immediately. The entity and the monitors will determine a mutually-satisfactory date, and the review will be rescheduled. However, State monitors reserve the right to conduct monitoring or unscheduled reviews as appropriate.

**Monitoring Process:** The Tennessee Department of Labor and Workforce Development (TDLWD) PAR monitors will use this monitoring guide to conduct fiscal system activities and program reviews. The guide will be amended as regulatory changes occur.

- The monitor review may be conducted through desktop evaluation, onsite evaluation, or through a combination of these two processes.
- PAR monitors are authorized to monitor any entity receiving (WIOA) funds at the American Job Comprehensive Centers. Their review may include: examining program records, questioning employees, interviewing participants, and entering any site or premise which receives WIOA funds.
- Random Sampling techniques will be used to perform the review of program records. Monitors will hold an exit conference with appropriate officials for each review conducted.
- After the monitors finish their examination, working papers shall be established during the review and maintained by the TDLWD.

**Time Schedules:** The PAR team begins to develop their Monitoring schedule.

**Monitoring:** A monitoring report is issued within fifteen (15) working days of the completion of the monitor working papers.

**Corrective Action:** A corrective action plan will be issued within thirty (30) calendar days of the publishing of the monitoring report requiring a corrective action or longer if the corrective action, provided to TDLWD for the first time, is not accepted by TDLWD.

**Progress Report:** A progress report will be issued (when requested by TDLWD) each month until the corrective action has been accomplished.

### **Required Monitoring Plan**

Grants, awarded by Workforce Services, consist of, at present, cost-reimbursement contracts awarded in most cases to local government and county administrative units. As provided in WIOA 2015, LWDAs are permitted to submit optional modifications to their local plans during the period covered by their plan.

Additional emphasis is placed on quality and integration of services and continuous improvement in performance outcomes. The aggregate effort of the providers, in the American Job Centers, determines that area's annual performance, and the combined efforts of all partners will be reflected in the statewide performance.

This outline should be used to gather information concerning the programs that PAR has been asked to monitor during fiscal year 2016-2017. By using the questions in this guide, during staff and management interviews (about each program), PAR should be able to receive consistent information from all grantors about all programs. The grantor can answer these questions and submit the information to PAR. Also, PAR staff may use this document as a guide when conducting information-gathering meetings with grantors.

### **Program Contact Information**

Susie Bourque, Director Policy and Special Grants  
Rubka Tamerat, Policy and Planning  
Phone (615) 741-1031

### **Fiscal Contact Information**

Ivan Greenfield, Director of Grants & Budgets Unit  
Kathy McCain, Grants & Budgets Unit  
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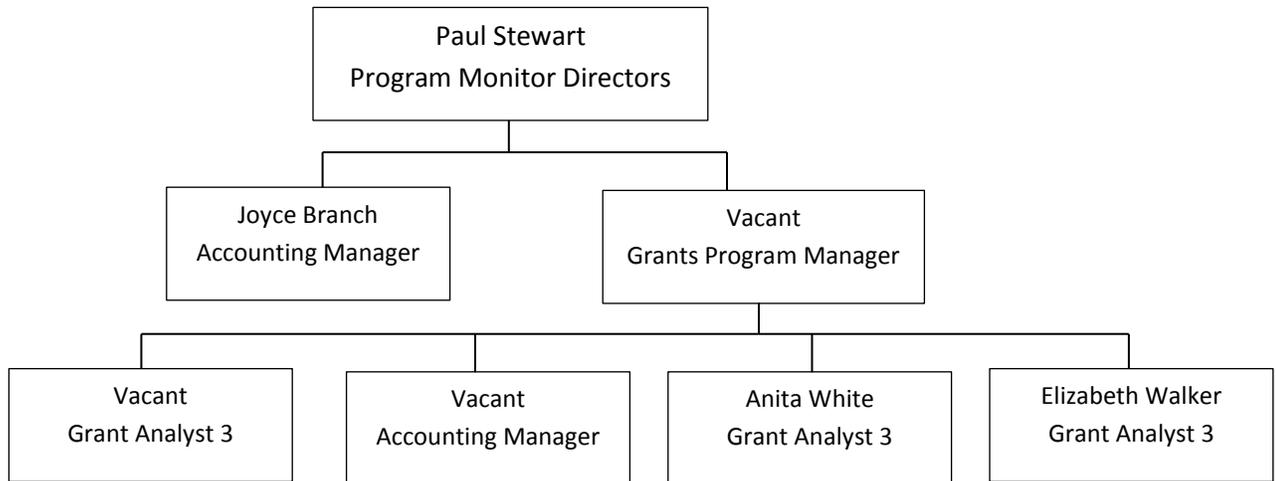
### **Contract Office**

Niveene X. Marcos, Manager, Fiscal  
Bill Haynes, Acct. Tech II, Fiscal  
Phone: (615)-532-1338 (Marcos)  
(615)-741-5353 (Haynes)

### **Contact for PAR Staff**

Paul Stewart, Director  
Program Accountability Review Unit  
Phone (615) 532-9866  
**Paul.Stewart@tn.gov**

**Tennessee Department of Labor and Workforce Development  
Program Accountability Review**



TDLWD has seven (7) Full Time Equivalent (FTE) positions responsible for monitoring all WIOA Programs. The staff is involved in monitoring formula, National Dislocated Worker Grant (DWG), incentive contracts, and all other WIOA (including former Workforce Investment Area (WIA)) contracts that are not closed.

**MONITORING/CORRECTIVE ACTION PLAN PROCEDURE**

- A. Grants and Budgets Unit (GBU) staff members update the department's monitoring guide based on guidelines and policy 2013-007 requirements which include lists of contracts, a risk assessment chart, and fiscal and program questionnaires for all WIOA programs.
- B. The Director for PS forwards the updated monitoring guide with a letter to General Services by October 1 of each year. Negotiations will take place until the Monitoring Guide is formally approved.
- C. When the monitoring guide has been approved by General Services, a copy is set to the Communications Office to be placed on TDLWD's Web site and a copy is sent to PAR.
- D. Planning and Special Grants staff receives a notice from PAR 30 days prior to a monitoring visit. PS staff enters the projected date of the review on a monitoring tracking spreadsheet (that is shared).
- E. PAR forwards the results of the monitoring review to the Assistant Administrator of Workforce Services.

- F. If there is no finding, and no corrective action is needed, PS staff enters the date on which the monitoring report is issued, the date on which the monitoring report was received, and the expression “no findings reported” on the spreadsheet.
- G. If there is a finding, the Corrective Action Plan (CAP) must be sent within 30 days. If the CAP is not accepted, a notice, offering technical assistance is needed, will be sent to the LWDA.
- H. If the CAP does not arrive within 30 days or if the CAP is not accepted, a notice will be sent to the LWDA, or technical assistance will be provided by Workforce Services staff.
- I. After 30 days, the CAP will be sent to the Planning and Special Programs director and to the Budget Grants director for approval.

## **POLICY 2013-007 REQUIREMENTS**

### **A. REQUIREMENTS FOR MONITORING WIOA**

All subrecipient contracts will be monitored by the Grantor Agency, Policy 2013-007

### **B. PERSONNEL INFORMATION REGARDING MONITORING STAFF**

Please find the monitoring staff organizational chart and FTEs on **Page 8**

### **C. FEDERAL AND STATE PROGRAM DESCRIPTIONS**

Please find the Federal and State program descriptions on **Page 10-24**

### **D. SUBRECIPIENT CONTRACT POPULATION**

Please see **Page 100** through **Page 109**

### **E. SUBRECIPIENT CONTRACTS TO BE MONITORED**

Please see **Attachment A**

### **F. MONITORING CYCLE**

**The WIOA Monitoring Cycle is based on the State Fiscal Year (October 1 - September 30)**

### **G. RISK ASSESSMENT AND ASSIGNMENTS**

Please see **Attachment B**

**H. SUMMARY OF FINDINGS**

Please see **Attachment C**

**I. GRANTS MONITORING PROCESS**

Please see **Page 5**

**J. MILITARY SERVICE FORM**

Please see **Page 134**

**K. SENIOR COMMUNITY EMPLOYMENT PROGRAM (SCSEP)**

Please see **Page 137**

In accordance with Section WIOA 184(a)(3) the Governor must take appropriate action to secure compliance with uniform administrative requirements including annually monitoring local areas (WIOA section 184 (4)).

The contracts listed in this manual, in **Attachment A**, will provide information to General Services and the public concerning TDLWD contracts issued and monitored throughout the year.

**MONITORING CYCLE**

**Monitoring Cycle: October 1, 2015 – September 30, 2016**

The Tennessee Department of Labor and Workforce Development will monitor all active contracts issued for that period and the amount of contracts allocated. Doing so fulfills the requirements under Policy 2013-007.

**PROGRAM DESCRIPTION**

WIOA Section 107 9d)(8) requires the local board, in partnership with the chief elected, to conduct oversight with respect to local programs of youth activities authorized under WIOA Section 129, local employment and training activities authorized under WIOA Section 134, and the one-stop delivery system in the local area. The new Federal legislation demanded that states build a more streamlined and more flexible workforce development system that meets the needs of its customers and avoids duplication of services.

To this end, WIOA 2015 requires that a physical location in each Local Workforce Development Area (LWDA) be established that provides universal access to a specific array of career services delivered by American Job Center Comprehensive Centers (WIOA Section 121 (e)(1)(B)).

**Program monitoring reviews may include, but are not limited to:**

- Reporting accuracy
- Record keeping and file maintenance
- Self-monitoring functions
- Service delivery
- Automated systems and reporting
- Human resources
- Policies and procedures

**Universal Labor Exchange Service**

This WIOA menu of services applies to participants described in the WIOA program and labor exchange programs. State merit-staff employees, along with other service providers at the career centers, provide career services. These services are provided for job seekers to include adults, older youth, younger youth and dislocated workers, and employers. Other service recipients of labor exchange programs include: Unemployment Insurance (UI) claimants, veterans, migrant and seasonal farm workers, older workers, SNAP program recipients, and individuals with disabilities (20 CFR Sub-Part C 652.207 et seq., (42) U.S.C. 4701 et seq., Addendum 1, OMB A-133 Compliance Supplement June 30, 2015, pp. 4-17.258 thru - 20).

**WIOA Funding**

WIOA authorizes three funding streams for programs – Adult, Youth, and Dislocated Workers. In Program Year 2016, 85% of the adult and youth funds and 65% of the dislocated worker funds were allocated to the LWDAs. Of remaining youth, adult and dislocated worker funds, 5% is used by states to administer the programs. In addition, of dislocated worker funds, 20% is used for Rapid Response and the remaining 10%, from each of the 3 programs, is used for statewide activities.

Of the total adult, youth and dislocated funds that the LWDA's receive, the LWDA's are allowed to use 10% for administrative purposes while the remaining 90% is used for program activities.

**WIOA Fiscal monitoring activities may include but are not limited to:**

- Budget methodologies
- Cash management practices
- Cost allocation plans and processes
- Cash disbursement compliance and documentation
- Program income identification and reporting
- Internal controls
- Purchasing and procurement processes and procedures
- Property accountability and safeguarding

**Federal Programs Services**

Services to Adult/Dislocated Worker (WIOA Section 134 (c)(2))

**CAREER SERVICES consist of:**

- (i) determinations of whether the individuals are eligible to receive assistance under this subtitle;
- (ii) outreach, intake (which may include worker profiling), and orientation to the information and other services available through the one-stop delivery system;
- (iii) initial assessment of skill levels (including literacy, numeracy, and English language proficiency), aptitudes, abilities (including skills gaps), and supportive service needs;
- (iv) labor exchange services, including—
  - (i) job search and placement assistance and in appropriate cases, career counseling, including—
    - (aa) provision of information on in-demand industry sectors and occupations; and
    - (bb) provision of information on nontraditional employment; and
  - (II) appropriate recruitment and other business services on behalf of employers, including small employers, in the local area, which services may include services described in this subsection, such as providing information and referral to specialized business services not traditionally offered through the one-stop delivery system;

- (v) provision of referrals to and coordination of activities with other programs and services, including programs and services within the one-stop delivery system and, in appropriate cases, other workforce development programs;
- (vi) provision of workforce and labor market employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including—
  - (I) job vacancy listings in such labor market areas;
  - (II) information on job skills necessary to obtain the jobs described in sub-clause (I); and
  - (III) information relating to local occupations in demand and the earnings, skill requirements, and opportunities for advancement for such occupations;
- (vii) provision of performance information and program cost information on eligible providers of training services as described in section 122, provided by program, and eligible providers of youth workforce investment activities described in section 123, providers of adult education described in title II, providers of career and technical education activities at the postsecondary level, and career and technical education activities available to school dropouts, under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.), and providers of vocational rehabilitation services described in title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.);
- (viii) provision of information, in formats that are usable by and understandable to one-stop center customers, regarding how the local area is performing on the local performance accountability measures described in section 116(c) and any additional performance information with respect to the one-stop delivery system in the local area;
- (ix) provision of information, in formats that are usable by and understandable to one-stop center customers, relating to the availability of supportive services or assistance, including child care, child support, medical or child health assistance under title XIX or XXI of the Social Security Act.
- (x) provision of information and assistance regarding filing claims for unemployment compensation;
- (xi) assistance in establishing eligibility for programs of financial aid assistance for training and education programs that are not funded under this Act;
- (xii) services, if determined to be appropriate in order for an individual to obtain or retain employment, that consist of—
  - (I) comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which may include—
    - (aa) diagnostic testing and use of other assessment tools; and
    - (bb) in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;
  - (II) development of an individual employment plan, to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve the employment goals,

including providing information on eligible providers of training services pursuant to paragraph (3)(F)(ii), and career pathways to attain career objectives;

- (III) group counseling;
- (IV) individual counseling;
- (V) career planning;
- (VI) short-term prevocational services including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct, to prepare individuals for unsubsidized employment or training
- (VII) internships and work experiences that are linked to careers;
- (VIII) workforce preparation activities;
- (IX) financial literacy services, such as the activities described in section 129(b)(2)(D);
- (X) out of area job search assistance and relocation assistance; or
- (XI) English language acquisition and integrated education and training programs; and
- (XII) follow-up services, including counseling regarding the workplace, for participants in workforce investment activities authorized under this subtitle who are placed in unsubsidized employment, for not less than 12 months after the first day of the employment, as appropriate.

**USE OF PREVIOUS ASSESSMENTS** – A one-stop operator or one-stop partner shall not be required to conduct a new interview, evaluation, or assessment of a participant if the one-stop operator or one-stop partner determines that it is appropriate to use a recent interview, evaluation, or assessment of the participant conducted pursuant to another education or training provider.

**TRAINING SERVICES to Adult/Dislocated Worker** (WIOA Section 134 (c)(3)(D) consisted of:

- (i) occupational skills training, including training for nontraditional employment;
- (ii) on-the-job training;
- (iii) incumbent worker training in accordance with subsection (d)(4);
- (iv) programs that combine workplace training with related instruction, which may include cooperative education programs.
- (v) training programs operated by the private sector;
- (vi) skill upgrading and retraining;
- (vii) entrepreneurial training;
- (viii) transitional jobs;

- (ix) job readiness training provided in combination with services described in any of clauses (i) through (viii);
- (x) adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with services described in any of clauses (i) through (vii); and
- (xi) customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training

**“Who is eligible for training” is determined by the following conditions.**

Funds allocated to a local area for adults and funds allocated for dislocated workers under WIOA section 133(b)(2)(B), shall be used to provide training services to adults and dislocated workers; respectively-----

- (I) who, after an interview, evaluation, or assessment, and career planning, have been determined by a one-stop operator or one-stop partner, as appropriate, to---
  - (aa) be unlikely or unable to obtain or retain employment, that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through the career services described in paragraph (2)(A)(xii);
  - (bb) be in need training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
  - (cc) have the skills and qualifications to successfully participate in the selected program of training services;
- (II) who select programs of training services that are directly linked to the employment opportunities in the local area or the planning region, or in another area to which the adults or dislocated workers are willing to commute or relocate

**Supportive Services:**

Support Services provided in collaboration with other providers, are mentioned in WIOA Section 3(59) and Section 134 (c)(2)(A)(xii)(X). Such services are:

Transportation	Section 3(59)
Childcare	Section 3(59)

Dependent care                      Section 3(59)  
Needs related payments necessary for participation in WIOA Section 3(59)  
Relocation assistance Section 134 (c)(2)(A)(xii)(X)

### **Adult Program Eligibility**

The description of eligible adults under WIOA is an individual who is:

Ages 18+

### **Documentation:**

The following is a list of basic documentation that career planners will need in order to provide services to individuals needing program services.

- A. Social Security Number
- B. Proof of citizenship or permanent residency card
- C. Work Permit Issued by Immigration and Naturalization Service
- D. Receipt of nondiscrimination documents, with signature of participant
- E. Dis-advantaged adults will become a priority for services after veterans. Seeking proof of income or qualifying disability is an eligibility requirement. (Workforce Investment Area (WIA) Memorandum 03-25)

**NOTE:** State Policy Limited funding in an LWDA is defined as a 75% expenditure rate before the end of the third quarter of that program year, at that time, the most in need or economically disadvantaged will be given priority for WIOA services after veterans are provided services. (WIOA Section 134(c)(3)(E))

### **Dislocated Worker Program Eligibility WIOA 3(15)**

- A. Individuals who: have been terminated or laid off, or who have received a notice of termination or layoff from employment; are eligible for or have exhausted their entitlements to unemployment compensation; have been employed for a duration sufficient to demonstrate attachment to the workforce but are not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under the State unemployment compensation law; are unlikely to return to a previous industry or occupation; are unlikely to return to a previous industry or occupation.

- B. Individuals who: have been terminated or laid off, or have received a notice of termination or layoff from employment as a result of any permanent closure of, or any substantial layoff at a plant, facility, or enterprise. They are also individuals who are employed at a facility where the employer has made a general announcement that such facility will close within 180 days; or, for purposes of eligibility, they are individuals who are to receive services other than training services described in section 134(c) (3), career services described in section WIOA 134(c)(2)(A) (xii), or supportive services. They are also individuals who are employed at a facility where the employer has made a general announcement that the facility will close.
- C. Individuals who were self-employed (including employment as farmers, ranchers, or fishermen) but are unemployed as a result of general economic conditions in the community in which the individual resides or are unemployed because of natural disasters.
- D. Individuals who are displaced homemakers--individuals who have been providing unpaid services to family members in the home and who has been dependent of the income of another in the home but is no longer supported by that income. An individual who is the spouse of a member in the Armed Forces on active duty as defined in WIOA section 101((d) (1) of title 10, United States (Code) and whose family income is significantly reduced because of deployment, a call or order to active duty, a permanent change of station, or by a service-connected disability (all of which are also defined by the US Code).

**NOTE:** Priority of services to veterans is a paramount and is to be observed in all employment and training activities. At each point of entry or program services, the LWDA must ensure that veterans are aware of their entitlement to priority of services and that the full array of services is available to them.

### **STATE GUIDELINES TO NOTE WHEN SERVING DISLOCATED WORKERS**

There are various factors that prevent individuals from being served as dislocated workers.

- A. Individuals who are unable to work for any reason, and such condition can be documented, are not considered eligible
- B. Individuals who voluntarily terminate (quit) their employment are not eligible for dislocated services as a result of that dislocation

- C. The situation outlined in the last two circumstances above would not prevent an applicant from receiving dislocated worker services if that individual is awarded UI benefits as a result of mitigating circumstances surrounding the termination for cause or voluntary termination.
- D. Applicants who are laid off with recall rights should not be excluded from dislocated worker services based solely on the recall factor. This situation will apply primarily to organized labor with employment contracts.
- E. An applicant shall not be considered eligible for dislocated worker services if that applicant has been dislocated for five or more calendar years from the date of attempted certification

### **National Dislocated Worker Grants (DWGs)**

The purpose of the National Dislocated Worker Grant is to provide supplemental dislocated worker funds to LWDAs and other eligible entities which allow them to respond effectively to workers and communities affected by major economic dislocations and affected by other dislocation events which cannot be met with formula allotments.

The services to be provided in the Dislocated Worker and National Dislocated Worker Grant programs, as initially shown in the introduction to this review guide, include: the eligibility referred to under National Emergency Grant below.

For disaster relief employment Dislocated Worker Grants, WIOA (TEGL 2-15):

- Allows Federal agency emergency or disaster declarations, in addition to those made by the Federal Emergency Management Agency, to trigger an opportunity for eligible entities to apply for assistance. The newly-eligible situations must fit the definition of emergency or disaster situations of national significance that could result in a potentially large loss of employment, as declared or otherwise recognized by the chief official of a Federal agency with authority for the Federal response to the emergency.
- Allows circumstances where a substantial number of individuals from a disaster area relocate to another area to trigger an opportunity for eligible entities, in the relocation area, to apply for assistance.
- Affirms eligibility for the grant program for self-employed individuals who become unemployed or significantly underemployed as a result of the emergency or disaster.

- Increases the temporary employment duration from six months (under WIA) to 12 months. The Secretary of Labor may extend the duration of disaster relief employment for up to an additional 12 months.

National Dislocated Worker Grants are provided through WIOA in order to deliver the following employment and training activities.

- A. To provide employment and training assistance to workers affected by major economic dislocations, such as plant closures, mass layoffs, or closures and realignments of military installations.
- B. To provide assistance to the Governor of Tennessee within the boundaries of which is an area that has suffered an emergency or a major disaster.
- C. To provide disaster relief employment in the area; and, to provide additional assistance to a State or local board for eligible dislocated workers in a case in which the State or local board has expended the funds provided under WIOA to carry out the activities and the State can demonstrate the need for additional funds to provide appropriate services for such workers.

## **ETA NATIONAL DISLOCATED WORKER GRANT**

### **Eligibility Criteria**

Eligible participants for DWG may include the following.

- A. A dislocated worker
- B. A civilian employee of the Department of Defense or the Department of Energy employed at a military installation that is being closed or that will undergo realignment, within the next 24 months after the date of the determination of eligibility
- C. Is a long-term unemployed individual, or is temporarily or permanently laid off as a consequence of a disaster (Note: long-term unemployed is defined by the state in the Terms and Conditions of the specific NEG contract.)
- D. An individual who is employed in a non-managerial position with a Department of Defense contractor, who is determined by the Secretary of Defense to be at-risk of termination from employment as a result of reductions in defense expenditures, and whose employer is converting operations from defense to non-defense applications in order to prevent worker layoffs; or

- E. A member of the Armed Forces who -- (I) was on active duty or full-time National Guard duty; (II) is involuntarily separated (as defined in section 1141 of title 10, United States Code) from active duty or full-time National Guard duty; or is separated from active duty or full-time National Guard duty pursuant to a special separation benefits program under section 1174a of title 10, United States Code, or the voluntary separation incentive program under section 1175 of that title;
- F. One who is not entitled to retired or retain pay incident to the separation; and applies for such employment and training assistance before the end of the 180-day period beginning on the date of that separation.

### **Applicants for ETA National Dislocated Worker DWGs**

Depending on the type of DWGs being sought, eligible applicants for DWGs may include:

- A designated state or outlying area WIOA program agency
- Local Workforce Development Boards
- Entities eligible to receive funding under WIOA (166)(c)(the Indian and Native American Programs provisions)
- Entities determined to be appropriate by the Governor of the State or outlying area involved
- Entities that demonstrate to the Secretary of Labor the capability to effectively respond to circumstances relating to particular dislocations.

This grant will be provided with 5% administrative funds to ensure that employers are providing skill-upgrade services to their current and newly-hired employees as specified in each grant agreement. This grant does not require LWDA to match these funds with LWDA formula funds.

### **Youth Program**

The purpose of the WIOA youth program is to improve the delivery of services to young people by assisting them with transitions, expectations, and skills needed for success in the workplace. The law calls for close links to local labor market needs and to community youth programs and services; the law also calls for strong connections between occupational and academic learning.

Youth programs include activities promoting youth development and citizenship such as leadership development through community service opportunities, adult mentoring and follow-up, along with targeted opportunities for youth living in high poverty areas.

### **Youth Program Eligibility**

WIOA defines a “youth” as either of the following:

- A. An out of school youth is an individual: not attending any school (as defined by State law); not younger than 16 years old; not older than 24. The out of school youth is further defined in Public Law 113-128 WIOA Section 129(a)(1)(B).
- B. In school youth is an individual: attending school (as defined by State law); not younger than age 14 or (unless an individual with a disability who is attending school under State law) older than age 21; the in school youth is further defined in Public Law 113-128 WIOA Section 129(a)(1)(C).

**In school youth** characteristics can be found on the following list. The in school youth is:

- Not younger than age 14 (or unless an individual with a disability who is attending school as defined under State laws)
- Basic skills deficient
- Attending school (as defined by the State law)
- A low-income individual
- A homeless individual
- An English language learner
- An offender
- Pregnant or parenting
- An individual with a disability
- An individual who lives in a high poverty area
- An individual who requires additional assistance to complete an education program or to secure or hold employment as defined in the local LWDA plan.

**An out of school youth (OSY)** must meet one of the following characteristics:

- A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent, complete school-year calendar quarter
- A recipient of a secondary school diploma or its recognized equivalent who is low income
- A youth with a disability
- Within the age of compulsory school attendance, but has not attended school for a least the most recent, complete school-year calendar quarter of the recent complete school-year calendar quarter
- A school dropout
- An English language learner
- Subject to the juvenile or adult justice system
- Requires additional assistance to complete an education program or to secure employment (as defined in the LWDA's plan).

**NOTE:** For any program year, not less than 75 percent of the funds allotted to local areas shall be used to provide youth workforce investment activities for out of school youth. WIOA Section 129 (a)(4)(A)

### **Allowable Youth Services (Program Elements)**

These elements are found in WIOA Section 129(c) as follows and shall consist of:

- (A) tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies leading 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;
- (B) alternative secondary school services, or dropout recovery services, as appropriate;
- (C) paid and unpaid work experiences that have as a component academic and occupational education, which may include—
  - (i) summer employment opportunities and other employment opportunities available throughout the school year;
  - (ii) pre-apprenticeship programs;
  - (iii) internships and job shadowing; and
  - (iv) on-the-job training opportunities;
- (D) occupational skill training, which shall include priority consideration for training programs that lead to recognized postsecondary credentials that are

aligned with in demand industry sectors or occupations in the local area involved, if the local board determines that the programs meet the quality criteria described in section 123;

- (E) education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
- (F) leadership development opportunities, which may include community service and peer- centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate;
- (G) supportive services;
- (H) adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;
- (I) follow-up services for not less than 12 months after the completion of participation, as appropriate;
- (J) comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;
- (K) financial literacy education;
- (L) entrepreneurial skills training;
- (M) services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
- (N) activities that help youth prepare for and transition to postsecondary education and training. (WIOA Sec. 129 (c)(2)(A)-(N))

## **Youth Documentation and Verification**

Eligibility is determined in a number of ways such as: a transfer of school records, income documentation, a birth certificate, or the participant's statements. PAR should expect to see whether or not eligibility has been verified. However, due to the volume of youth participants, it is recommended that PAR examine a 10% sample of the files, or examine 25 participant records (whichever is smaller).

## **Youth Council Membership**

According to WIOA Section 107 (b) (4) (C), the previous youth council members are permitted to advise the Local Workforce Development Board regarding issues that affects youth. Some of these responsibilities are: to guide and to advise the local board under WIOA in issues related to youth and to take equal responsibility for identifying eligible providers of youth activities in the local area. The Youth

Council Members role is to assist the local boards in all affairs concerning youth. On the other hand, each LWDA may establish a standing youth committee that works with the Local Workforce Development Board (LWDB) by serving as an advisory board to the full LWDB (WIOA §107 (4) (C)).

**Youth Council or Standing Committee Members Role** includes the following:

- A. Developing parts of the local plan relating to eligible youth, as determined by the chairperson of the LWDB
- B. Recommending eligible service providers to be awarded grants on a competitive basis and to carry out youth activities under WIOA, subject to approval of the LWDB
- C. Conduct oversight with respect to eligible providers of youth services in the local area
- D. Coordinate youth activities that:
  - Provide eligible youth with assistance in achieving academic and employment success, effective and comprehensive activities; all of this should include options for improving educational and skill competencies and effective connections with employers
  - Ensure ongoing mentoring opportunities with adults
  - Provide opportunities for training
  - Provide incentives for recognition and achievement
  - Provide opportunities related to leadership development, decision making, citizenship, and community service
  - Are deemed appropriate by the chairperson of the LWDB

### **Statewide Funded Projects (Governor's Reserve Funds)**

Statewide programs are various programs that the State directly contracts with various entities; including LWDA's. Workforce Services from time to time will develop statewide programs to improve the skills of a special population in the State.

### **Statewide Programs Eligibility Criteria**

Eligibility for these programs is the same as with other WIOA programs or funding streams (adult, dislocated worker, and youth). However, the skill-shortage grant

eligibility criteria are different since these services are geared toward skill-specific training.

To receive Statewide Funds, the qualified LWDA must provide a short summary describing the circumstances for requesting funds. The summary should include: the amount of available funds in the particular funding source; the total cost of training and cost per participant; the previous occupations of the customers, and the new training field these customers are seeking; an analysis of the needs survey if there is a request due to a plant closure or a mass layoff; the reasons for not using other funding sources to pay the training costs (Pell Grants, etc.); and, evidence of coordinated efforts with other partners to meet the other needs of the customers requesting training services. The decision for approval or denial of State funding will be made within seven working days of the receipt of this application. If the State denies the request for funding, the State will forward the LWDA a National Reserve Grant application.

### **Statewide Programs: Focus Areas, Policies, and Test Sampling**

Additional information and questions regarding each specific statewide grant or activity may be found in the State contract. WIOA federal regulations do not specify what percentage or how many of the participant files should be reviewed. If the standard review which PAR conducts is 20%, this should be adequate.

### **Asset Building Project**

In Program year 2014, the Tennessee Department of Labor and Workforce Development in partnership with local investment areas was making WIA funds available for Asset Building. The funds were provided to businesses in local areas that had: innovative models addressing employee certifications; targeted skills upgrades; internship models; apprenticeships; business/education partnership recruitment and community outreach strategies.

Employers have a short window to apply for these grants and to provide short-term training for their workers. Activities under this grant ended January 2015. This project was supported with statewide funds. The Department of Labor and Workforce Development continues to evaluate each grant recipient's program results and provide information to LWDA's. The outcome of these grants will be used to replicate the best practices learned across the State. Doing so, ensures

that future results for skills upgrades will be positive and will help workers keep up with the latest technologies and opportunities for growth. Under this grant, employers may assist incumbent workers, interns and other trainees.

### **Incentive Grants**

These grants will be provided to LWDA's in recognition of performance that exceeds negotiated levels. The purpose of the incentive grant is to carry out one or more innovative programs under WIOA Title II, or the Carl D. Perkins Vocational and Technical Education Act. Local incentive grant funds may be used for any of these activities and other activities with the written approval of the Department of Labor and Workforce Development. Not all incentive funds are spent on participants; yet, if an LWDA plan, for incentive funds, reflects participant services, then the incentive contract needs to be reviewed using the same guidelines as regular adult, dislocated worker, and/or youth program contracts. Incentive grants awarded in Tennessee must be monitored on a yearly basis.

## **OTHER PROGRAM RELATED ELEMENTS**

### **Request for Statewide or National Reserve Funds**

An LWDA may request additional State Reserve Funds and/or National Reserve Funds if that LWDA does not have sufficient funds to serve WIOA Title I eligible customers, who have been terminated or laid off, or who have received a notice of termination from an employer.

When a request for National Reserve funds is made, the State, in collaboration with the administrative entity, in one or more local areas, will submit a grant application to the United States Department of Labor (USDOL).

### **Service Providers**

For-profit and non-profit providers may be used to deliver services. However, each training provider (that the LWDA uses for its respective area) must be approved as an eligible training provider as specified in the Tennessee State Plan. This plan is accessible on the department's Web page <http://www.tn.gov/workforce/article/strategic-plans-wfs>. The list of eligible training providers is routinely updated and can be accessed through the same hyperlink.

## **Policies**

Even though State policies are not specifically stated in the contracts, policies and changes made to previous policies may be found on at department's Web site. The policies issued for this program are routinely available at Workforce Development Web page <http://www.tn.gov/workforce/article/ae-policies> after these policies are distributed via e-mail and via US mail to the LWDAs and to WIOA partners and contractors. In addition, the *WIOA/VOS- Program Manual*, the *Workforce Innovation and Opportunity Act Programs Technical Assistance Manual*, and the *State Financial Management Handbook* will be made available to LWDAs through this Web site.

## **Guides**

The current monitoring guide makes references to current policies and the *Workforce Innovation and Opportunity Programs Technical Assistance Manual*. However, there will be policy changes and updates in the Technical Assistance Manual throughout the year. The updated materials will be e- mailed to PAR monitors and posted on the Department of Labor and Workforce Development Web site.

## **Allowable Activities**

It is important that a Program Accountability Review (PAR) team review the IEPs (Individual Employment Plans designed for participants) and then determine whether the plans have been implemented. PAR should expect to see, in the Virtual One Stop Consolidated Case Management System (VOS), documentation that can be used to examine and track the activities of participants. This system will allow the review of the individual plan designed for a participant. This plan will include an assessment and activities which the participant receives to address his or her needs.

## **Allowable Costs**

- Budget revisions need to be made whenever increases or decreases are approved.
- Close-out reports are due forty-five (45) days after the end of the contract period.

- The State will need seven to nine working days in order to process the drawdown request/reimbursement. This means that the request for drawdown is needed, by the state, at least nine days prior to the anticipated date. If contractors submit a drawdown request after this time, there is no guarantee of its being paid by the following week. Drawdown requests must be received, by the Tennessee Department of Labor and Workforce Development, no later than Wednesday (CST) noon if these drawdowns are to be available the following Friday.
- All contractors must estimate needs based upon cash outlays.
- Funds may be drawn down no more frequently than weekly.

### **Fiscal Reporting**

- A monthly Expenditure Report is due, for each contract, by the 25<sup>th</sup> of the following month.
- A Quarterly Report, reflecting accrued expenditures (by cost category, when needed, on a cumulative basis), must be submitted for each contract by the 25<sup>th</sup> of the following month, or if necessary, submitted by a date determined by Fiscal Services.
- The Quarterly Report must reflect program income, if any, and rebates or refunds to any program. There is also a WIOA Stand-in Costs Report that must be submitted if costs are to be considered as a substitute for disallowed costs (as the result of an audit or other review).
- A Close Out package is to be completed for each contract and is due forty-five (45) days after the end of the contract period.

### **NON-DISCRIMINATION**

The Department of Labor and Workforce Development, State and LWDBs, American Job Center Comprehensive (One-Stop) Career Centers, service providers, vendors, and sub-recipients are committed to full compliance with the following nondiscrimination and equal opportunity laws and with implementing of the following regulations.

- Civil Rights Act of 1964
- Rehabilitation Act of 1973, Section 504
- Americans with Disabilities Act of 1990
- Title IX of the Education Amendments of 1972

- Age Discrimination Act of 1965
- Department of Justice Final Rule 2002
- WIOA Section 188
- The regulations implementing the statutory provisions
- TEGL 26-13

Thus, PAR reviewers need to ensure that the subrecipient is in compliance with the listed nondiscrimination provisions found in TCA §4-4-123 and TCA §4-21-901 et seq. These provisions are in place to ensure that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance (United States Code, §2000d).

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance (United States Code, §1681).

No person in the United States shall, on the ground of blindness or severely impaired vision, be denied admission in any course of study by a recipient of Federal financial assistance for any education program or activity, but nothing herein shall be construed to require any such institution to provide any special services to such person because of his blindness or visual impairment (United States Code, §1684).

These laws and regulations are applicable to all of the programs, activities, and operations of TDLWD and to subrecipient entities with which the department contracts to utilize Federal funds. WIOA 2015 describes these requirements as follows.

NON-DISCRIMINATION, (a) In General--(1) Federal financial assistance.--For the purpose of applying the prohibitions against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.), on the basis of disability under section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), on the basis of sex under Title IX of the Education Amendments of 1972 (20 U.S.C. 1681 et seq.), or on the basis of race, color, or national origin under Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.), programs and activities funded

or otherwise financially assisted in whole or in part under this Act are considered to be programs and activities receiving Federal financial assistance. (2) Prohibition of discrimination regarding participation, benefits, and employment. No individual shall be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with, any such program or activity because of race, color, religion, sex (except as otherwise permitted under Title IX of the Education Amendments of 1972), national origin, age, disability, or political affiliation or belief. (3) Prohibition on assistance for facilities for sectarian instruction or religious worship.—Participants shall not be employed under this title to carry out the construction, operation, or maintenance of any part of any facility that is used or to be used for sectarian instruction or as a place for religious worship (except with respect to the maintenance of a facility that is not primarily or inherently devoted to sectarian instruction or religious worship, in a case in which the organization operating the facility is part of a program or activity providing services to participants). (4) Prohibition on discrimination on basis of participant status.—No person may discriminate against an individual who is a participant in a program or activity that receives funds under this title, with respect to the terms and conditions affecting, or rights provided to, the individual, solely because of the status of the individual as a participant. (5) Prohibition on discrimination against certain non-citizens.—Participation in programs and activities or receiving funds under this title shall be available to citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylums, and parolees, and other immigrants authorized by the Attorney General to work in the United States (WIOA Section 188).

The local board shall annually assess physical and programmatic accessibilities, (in accordance with section 188, if applicable, and in accordance with applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.)), of all one-stop centers in the local area.

### **Nondiscrimination Reporting Requirements**

Documentation and other compliance measures, required for compliance with nondiscrimination statues and regulations, include a nondiscrimination status and non-discrimination provision indicating that the provider has explained these nondiscrimination provisions to eligible customers including employers.

All individuals, covered by these regulations, must sign a hardcopy acknowledging their awareness of these nondiscrimination provisions; and, the hardcopy of the signature page must be kept in the individual signer's file:

A. Subrecipient must provide initial and continuing notice that the [subrecipient does] not discriminate on any prohibited ground. This notice must be provided to:

- (1) Registrants, applicants, and eligible applicants;
- (2) Participants;
- (3) Applicants for employment and employees;
- (4) Unions or professional organizations that hold collective bargaining or professional agreements with the subrecipient;
- (5) Sub-recipients that receive WIOA Title I funds from the State;
- (6) Members of the public, including those with impaired vision or hearing;  
(b) as provided in Sec. 29 CFR 37.9, the subrecipient must take appropriate steps to ensure that communications with individuals with disabilities are as effective as communications with others.

All notices must contain the specific language indicated below.

### **Equal Opportunity is the Law**

In the United States, it is against the law for the recipient of Federal financial assistance to discriminate, against any individual, on the basis of: race, color, religion, sex, national origin, age, disability, political affiliation or belief; this includes, any beneficiary of programs financially assisted under Title I of WIOA of 2014 on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or based on his or her participation in any WIOA Title I-financially-assisted program or activity. The recipient of such Federal funds must not discriminate in any of the following areas: deciding who will be admitted, or have access to any WIOA Title financially-assisted program or activity; providing opportunities in, or treating any person with regard to such a program or activities or making employment decisions in the administration of, or in connection with, such a program or activity (29 CFR 37.29).

Subrecipients that publish or broadcast program information in the news media must ensure that such publications and broadcasts state that the WIOA Title I

financially assisted program or activity in question is an equal opportunity employer/program (or otherwise indicate that discrimination in the WIOA Title I financially assisted program or activity is prohibited by Federal law). This publication must also indicate that auxiliary aids and services are available upon request to individuals with disabilities (29 CFR 38.25).

Certain subrecipients are required to provide language assistance to individuals who do not speak English as their primary language and who have a limited ability to speak, read, write or understand English. These individuals are to be considered Limited English Proficient (LEP) and are entitled to free language assistance. Sub-recipients can begin to comply with these provisions through application of the 4 Factor Test as described in policy guidance issued by the U.S. Department of Justice dated April 12, 2002.

### **Same Sex Marriage**

Consistent with Employment and Training Administration (Washington), (ETA's) policy is to recognize same-sex marriages as broadly as legally possible. ETA requires grantees to develop policies recognizing such marriages as valid as soon as possible. For purposes of this TEG, a "State grantee" includes the subsets of a State such as a city or local board, any Indian tribe, the District of Columbia [and others receiving US grants from ETA]. ETA strongly advises and encourages such entities to honor all marriages that are valid in the State of celebration. However, ETA will not require a State grantee to honor a marriage recognized as valid in the State of celebration as is required in a non-state grantee (TEGL No. 26-13, p. 3, "4.").

### **Grievance Procedures**

Under WIOA Section 181(c) "Requirements and Restrictions," GENERAL.—Each State and local area receiving an allotment or allocation under this title shall establish and maintain a procedure for grievances or complaints alleging violations of the requirements of this title from participants and other interested or affected parties. Such procedure shall include an opportunity for a hearing and be completed within 60 days after the filing of the grievance or complaint. If a decision relating to the violation has not been reached in 60 days, additional procedures may include an investigation and final determination relating to the appeals of the allegation. Other issues relative to grievance procedures, such as remedies and rules of construction, are also covered in Section 181 as well as CFR 667.600.

**WAIVERS APPROVED 2014 -- 2017**  
**Not WIOA but instead WIA Funded Programs**

The purpose of the general statutory and regulatory waiver authority is to provide flexibility to states and local areas and to enhance their ability to improve the statewide workforce investment system (20 CFR §662.400).

- A. Waiver of the prohibition at CFR 664.510 on the use of Individual Training Accounts for older and out-of-school youth.

The State was previously granted a waiver of the prohibition at 20 CFR 664.510 on the use of Individual Training Accounts (ITAs) for older youth and out of school youth program participants. The State was granted an extension of this waiver through **June 30, 2017**. Under this waiver, the State can use ITAs for older youth and out of school youth program participants. The State must continue to make the 10 youth program elements available as described at WIA Section 129(c)(2) **for contracts under WIA**. The State should ensure that funds used for ITAs are tracked and that the ITAs are reflected in the individual service strategies for these. (Additional elements are pending approval from USDOL.)

- B. Waiver to permit the State to replace the performance measures at WIA Section 136(b) with the common measures.

The state was granted this waiver through **June 30, 2017**. The State was previously granted a waiver that allows the State to replace the 17 performance measures under WIA Section 136(b) with the common measures. This waiver permits the State to negotiate and report WIA outcomes against the common performance measures only, rather than the performance measures described at WIA Section 136(b). The State will no longer negotiate and report to ETA on the following WIA measures: WIA adult and dislocated worker credential rates; participant and employer customer satisfaction; older youth measures; and younger youth measures. The State will use the three adult common performance measures to negotiate goals and report outcomes for the WIA Adult and WIA Dislocated Workers programs. The State will use the three youth common performance measures to negotiate goals and report outcomes for the WIA Youth program. Workforce Investment Act Standardized Record Data system (WIASRD)

item 619, Type of Recognized Credential, should be completed for each individual as appropriate, regardless of this waiver to report on common performance measure outcomes only.

- C. Waiver of WIA Section 133(b) (4) to increase the allowable transfer amount (up to 50%) between Adult and Dislocated Worker funding streams allocated to a local area.

The State is granted this waiver through **June 30, 2017**. Under the waiver, transfer authority is limited to 50 percent. This limitation provides states flexibility while ensuring consistency with Congressional intent regarding the level of funding appropriated for the WIA Adult and Dislocated Worker programs.

- D. Waiver of WIA Section 123 that requires that providers of Youth program elements to be selected on a competitive basis.

The State is partially granted this waiver through **June 30, 2017**. Under this waiver, the State is permitted to allow its American Job Center Comprehensive (One-Stop) Career Centers or partner agencies to directly provide youth program elements of supportive services, follow-up services, and work experience. In utilizing this waiver, the State and local areas must still meet Office of Management and Budget requirements (codified in 29 CFR 95.40-95.48 and 97.36) and all state and local procurement laws and policies.

- E. Waiver of WIA Section 134 (a) to permit local areas a portion of local funds (up to 10%) for incumbent worker training.

The State was granted an extension of this waiver through **June 30, 2017**. Under this waiver, the State is permitted to allow local areas to use up to 10 percent of local Dislocated Worker funds and up to 10 percent of local Adult funds for incumbent worker training only as part of a lay-off aversion strategy. Use of Adult funds must be restricted to serving lower-income adults under this waiver. The ETA believes limiting incumbent worker training to the specified level and requiring it to be a part of layoff aversion is the best use of funds in the current economic climate where serving unemployed workers is a paramount responsibility of the workforce system. All training delivered under this waiver is restricted to skill attainment activities. Local areas must continue to conduct the required local employment and training activities at WIA Section 134(d), and the State is required to report performance outcomes for any individual served under this

waiver in the WIASRD (field 309). TEGE No. 26-09, Section 7A, "Workforce Investment Act (WIA) Waiver Policy and Waiver Decisions for PY 2009 and 2010" and TEGE No. 30-09, "Layoff Aversion Definition and the Appropriate Use of Incumbent Worker Training for Layoff Aversion Using a Waiver" provide policy guidance related to implementation of this waiver.

- F. Waiver of WIA Section 134(a)(1)(A) to permit a portion of the funds reserved for rapid response activities to be used for incumbent worker training.

The State was granted an extension of this waiver through **June 30, 2017** to permit use of rapid response funds to conduct allowable statewide activities as defined under WIA Section 134(a)(3), specifically, incumbent worker training. Under this waiver, the State is permitted to use up to 20 percent of rapid response funds for incumbent worker training only as part of a lay-off aversion strategy. ETA believes limiting incumbent worker training to layoff aversion is the best use of funds in the current economic climate where serving unemployed workers is a paramount responsibility of the workforce system. All training delivered under this waiver is restricted to skill attainment activities. The State is required to report performance outcomes for any incumbent workers served under this waiver in the WIASRD (field 309). TEGE No. 26-09, Section 7A, "Workforce Investment Act (WIA) Waiver Policy and Waiver Decisions for PY 2009 and 2010" and TEGE No. 30-09, "Layoff Aversion Definition and the Appropriate Use of Incumbent Worker Training for Layoff Aversion Using a Waiver" provide policy guidance related to implementation of this waiver.

- G. Waiver of WIA Section 134(a)(2)(B)(ii) and 20 CFR 665.200(D) to exempt the state from the requirement to conduct evaluations.

The State was granted this waiver through June 30, 2013. However, an extension request has been submitted through **June 30, 2017**. At the time of the submission of this guide, the State was still waiting for a response from USDOL. This grants a waiver of the requirement to conduct evaluations of workforce investment activities for adults, dislocated workers, and youth in order to establish and promote continuous improvement of the statewide workforce investment system.

- H. Waiver of WIA Section 134(a)(2)(B)(iii) and 20 CFR 665.200(e) to exempt the state from the requirement to provide local workforce investment areas

with incentive grants. However, an extension request has been submitted through **June30, 2017**. At the time of the submission of this guide, the State was still waiting for a response from USDOL. This would waive the requirement to provide local workforce investment areas incentive grants to reward regional cooperation, local coordination of activities, and exemplary performance.

### **ONE-STOP CAREER SYSTEM AND PARTNERS (American Job Center/Career Centers)**

Purpose: The American Job Center or One-Stop Career System centers and consortia partners administer and deliver employment services to adults, youth, and dislocated workers in order to improve access to WIOA Title I program components and also to increase long-term employment opportunities for individuals. The required Federal partners in the consortia include, among others, Veterans Workforce programs, Wagner-Peyser programs, Adult Education and Literacy, Rehabilitation Act of 1973 programs, the Social Security Act, and the Trade Act of 1974 programs. (An exhaustive list of required partners can be found at WIOA §121 (b)(1)(B)(i-xii). It is allowable for additional entities to be named in the MOU, or included in competitive grant announcements, in order to administer and deliver TANF programs, National and Community Service Act programs, and more.

#### **WIOA Memoranda of Understanding (MOU)**

Section 121 (2) (c) of WIOA provides that the local board, with the agreement of the chief elected official, develop a single MOU covering all partners at the one-stop.

In Tennessee, a single MOU process assists both the Grant Authority and the Local Workforce Development Board by: (1) allowing a partnering agency's Duration of Term to extend until the parties mutually agree to modify the agreement; (2) streamlining the signatory process; (3) providing a simpler, yet more comprehensive, composite of the Local Career Center System by delineating each partnering agency's contribution by each individual county Career Center facility.

#### **The Statutory requirements for the instrument**

Each memorandum of understanding must contain provisions describing the following.

- A. The services to be provided through the one-stop delivery system
- B. The manner in which services and the operating costs of such system will be funded
- C. Methods of referral of individuals between the one-stop operator and the one-stop partners for services and activities
- D. Methods to ensure the needs of workers and youth, and individuals with barriers to employment including individuals with disabilities, are addressed in the provision of necessary and appropriate access to services including access to technology and materials made available through the one-stop delivery system; and
- E. Duration of the memorandum of understanding
- F. Other provisions, consistent with the requirements of this Title, as the parties to the agreement determined to be appropriate

**The MOU contains the following elements**

- A. MOU Boilerplate: Each partnering agency is listed under “Parties to this agreement:
- B. Partner’s MOU: Each party to the agreement must have an individual component consisting of the following elements:
  - Cover Sheet identifying the partnering agency by name, address, and contact person
  - Special Terms and Conditions Page allowed by the agency’s contractual regulations to include a page labeled “Special Terms and Conditions”
- C. Letter of Confirmation indicating which required partners are not included due to services not being available in the LWDA.

D. Signatory Sheet signed by the Local Workforce Development Board Chairperson, the Local Chief Elected Official(s) Chairperson, and the signature authority of all partnering agencies.

E. Executive Summary containing:

- A rollup of all partner programs or services provided, how the services will be provided, methods of referral, and personnel positions by title, part-time or full-time (if part-time, scheduled hours/days) by individual county facility
- The Local Career Center System total budget rollup showing the source, amount of the funds and allocation method(s), and indirect costs by each partnering agency by county facility
- The Local Career Center System total budget rollup depicting the partner agency's total contribution

### **PERFORMANCE OUTCOME MEASURES**

The WIOA specifies core indicators of performance for activities in adult, dislocated worker, and youth programs have not been set. However, until then the nine WIOA Common Measures will apply to the adult, dislocated worker, and youth programs. PAR will not verify outcome data; it will only verify the process to gather the outcomes to be reviewed.

The outcomes are supported by the contracts in that the State Plan. Each local workforce area plan includes information regarding goals for each performance measure and how services will be provided to achieve successful outcomes for each measure. Federal guidance describes the opportunity for additional program funds if performance goals are successfully achieved. There also are possible sanctions if performance goals are not met.

### **PY 2015 Common Measures for WIOA Activities**

The State plan, as well as each LWDA plan, includes information regarding goals for each performance measure and how services will be provided to achieve successful

outcomes for each measure. Federal guidance describes the opportunity for additional program funds if performance goals are successfully achieved. There also are possible sanctions if performance goals are not met. Please see the attached *Table for State Performance Indicators and Goals*; for reporting parameters, please see the associated *Table for Data Capture and Reporting*.

Six required performance measures apply to adult and dislocated worker programs.

- A. The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program
- B. The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program
- C. The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program
- D. The percentage of program participants who obtained a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent during participation in or within 1 year after exit from the program.
- E. The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment.
- F. The indicators of effectiveness in serving employers.

### **Youth Program Outcomes and Reporting**

Five required performance measures (common measures) apply to youth programs, for reporting outcomes, funded by WIA 1998. These are:

#### **Youth Performance Indicators**

- A. The percentage of program participants who are in education or training activities, or in unsubsidized employment, during the second quarter after the exit from the program
- B. The percentage of program participants who are in education or training activities, or in unsubsidized employment, during the fourth quarter after exit from the program; and
- C. The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program

- D. The percentage of program participants who obtained a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent during participation in or within 1 year after exit from the program.
- E. The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains towards such a credential or employment

# FISCAL QUESTIONNAIRE

Subrecipient: \_\_\_\_\_

Reviewer: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Executive Director Signature: \_\_\_\_\_ Fiscal Director Signature \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

**WORKFORCE INVESTMENT MONITORING TOOL  
FISCAL QUESTIONNAIRE**

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Have all of the LWDA's programs, exceeding \$500,000 in WIOA funding, been audited during the past two years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to the audit report and the corrective action if any are on file with the administrative office.
2.	If so, have all audit reports been sent to grantor agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please cross-reference the LWDA administrative office and grantor agency for verification
3.	Does the LWDA annually authorize all bank accounts and check signatories?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify with current bank documentation of authorization and check signatories at LWDA and compare to TDLWD fiscal office
4.	Does the LWDA have a line item budget for the adult, dislocated worker, and youth program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the budget for each program.
5.	Does the agency have a method to ensure that the obligation on all contracts does not exceed availability?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the procedure or any method the LWDA uses to prevent over-obligation of contracts.
6.	Were the expenditures on contracts (WIOA contracts) over reported?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check all invoices and reconciled reports submitted to TDOL during the monitoring period.
7.	How often does the LWDA draw down cash and how does it determine the amount to be drawn?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the cash management activities and the needs for the amounts to be drawn.
8.	Does the LWDA have a policy on cash management and does it follow any such policies on cash management?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if its policy is followed as instructed?
9.	If the LWDA has purchased equipment costing \$100-\$5,000, did the LWDA request approval? Approval for equipment over \$5,000?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see the approval and the request submitted to TDLWD? (For equipment both less than \$5,000 and more than \$5,000)
10.	Does the LWDA account for any program income earned? Were all program incomes reported if any?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please learn whether or not the LWDA has earned program income and reported it to TDLWD during the proper reporting quarter?

11.	Does the LWDA have excess cash on hand?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please compare the amount of drawdown each month with expenditures to see if all draws are expended before making additional drawdown requests (for each contract drawdown requested)?
12.	Did the LWDA use its earned program income for program service(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check what the program income was used for.
13.	How does the LWDA allocate funds to staff working in various grants? How is time of staff allocated and documented for these various programs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check with the fiscal administrator to review staff time distribution sheets and the calculations based on the documented time distribution.
14.	Is the LWDA adhering to the state travel regulations when its employees are on business travel? Are mileage logs documented and payments based business trips only?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the LWDA's travel policy and how it is followed and how payments made.
15.	Are the agency's vehicles used by personnel for personal business?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if payments are made for personal use and if the LWDA authorized these vehicles to be used as personal vehicles for the staff.
16.	Is new equipment tagged and inventory taken before the quarter preceding the monitoring visit? If equipment is missing, did the LWDA report to authorities and inform TDLWD?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the inventory list and see if it is updated to account for all new acquisitions. Please check to see the document submitted to local authorities and to TDLWD for missing equipment.
17.	Did the cognizant agency provide an approval letter for indirect cost rate for the WIOA program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please request letter of approval from administrative staff.
18.	Are time sheets maintained for any employees who work on more than one program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review time sheets of employees assigned to more than one program, for Labor Distribution.
19.	Are the LWDA's depreciation policies or methods of computing use allowances in accordance with the standards outlined in federal circulars or WIOA regulations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review LWDA depreciation policies.
20.	Does the LWDA system have procedures that provide reasonable assurances that consistent treatment is applied in the distribution of charges as direct or indirect costs to all benefiting programs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review procedures regarding distribution of direct/indirect charges.

21.	Are all expenditure and obligations made within the contract period?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please examine the general ledger and other support documentations to ensure all expenditures are within the contract period materials aterilas the LWDA consult administrative staff to identify employees given access to personnel files review.
22.	Has the LWDA met the 75% expenditure for out of school youth activities?				Please review the expenditures at the end of the contract you are examining
23.	Does the LWDA have a record of the cost allocation plan approved by the cognizant agency and did the LWDA apply these costs accurately and consistently?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the plan and paper work to see how the approved indirect cost is applied.
24.	Are administrative costs applied according to the plan for the particular contract number or program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review administrative costs and how they are applied to each contract and determine if the costs are within the limits allowed.
25.	Are all purchases above the threshold amount competitively bid?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review purchase orders and verify the existence of several suppliers.
26.	Has the LWDA sent a request to TDLWD for acquisition of equipment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please ask for a copy of the request form.
27.	Have the subrecipients required their subcontracts included the language that they will post jobs for Tennessee on their website?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review subcontract agreements and ensure that the agreement contains compliance information and monitoring schedule.
28.	Does management provide personnel approving and pre- auditing expenditures with a list of allowable and unallowable expenditures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review allowable and unallowable list management provided to personnel.
29.	Is there separate accountability for charges and costs between federal and nonfederal activities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the accountability for cost and charges to federal and nonfederal activities.
30.	Are adjustments to unallowable costs made where appropriate and follow-up action taken to determine the cause?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if there are unallowable costs and if they have been corrected, and also followed up to avoid future occurrences.
31.	Have internal and external communication channels, on activities and costs allowed, been established?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to each contract agreement regarding activities and allowed costs.
32.	Have formal or informal training programs been established to provide the knowledge and skills necessary to determine activities and costs allowed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to training manuals, developed or training held, for new subcontractors at the local level.

33.	Is there interaction between management and staff regarding questionable costs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to communications between management and staff regarding questionable costs, if any.
34.	Are grant agreements (including referenced program laws, regulations, handbooks, etc.) and cost principle circulars available to staff responsible for determining activities allowed and allowable costs under federal awards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see if the fiscal staff at the LWDA has the WIA Financial Supplementary Handbook or the One Stop Guide for reference and the WIA law and regulations.
35.	Does management review supporting documentation of allowable cost information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Consult with management team or responsible party for reviewing allowable costs.
36.	Are comparisons with the budget and expectations of allowable costs made?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the procedure used to compare budget and allowable costs.
37.	Are analytical reviews and audits performed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review audit report.
38.	Is the accounting system capable of scheduling payments for accounts payable and requests for funds from treasury to avoid time lapse between drawdowns and actual disbursements of funds?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the procedure used to avoid time lapse between drawdowns and actual disbursement of funds.
39.	Is there variance reporting of expected versus actual cash disbursements of federal awards and drawdowns of federal funds?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if there are variances between <b>cash</b> disbursement and drawdown of federal funds.
40.	Are there periodic independent evaluations (e.g., by internal audit, top management) of entity cash management, budget and actual results, repayment of excess interest earnings, and federal drawdown activities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check if evaluation has been made regarding cash management, budget and actual results, repayment of excess interest earnings, and federal drawdown activities.
41.	Are contractor and subcontractor payrolls monitored to ensure certified payrolls are submitted?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the agreements and contract terms between contractor and subcontractor.
42.	Are management reviews performed to ensure that contractors and subcontractors are properly notified of the Davis- Bacon Act (for incumbent worker or for on-the-job training) services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the Davis-Bacon Act requirements.
43.	Are periodic audits of detailed transactions conducted?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the audit report.
44.	Are accurate records maintained on all acquisitions and dispositions of property acquired with federal awards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see if records kept on all acquired property are up-to- date and that a copy has been sent to TDLWD.

45.	Are property tags placed on equipment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please to see if all property acquired with federal funds is tagged.
46.	Is a physical inventory of equipment periodically taken and compared to property records?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see if the inventory listing of all equipment is up-to- date.
47.	Have procedures been established to ensure that the federal awarding agency is appropriately reimbursed for dispositions of property acquired with federal awards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the procedure developed to ensure appropriate reimbursement for acquired property.
48.	Are policies and procedures in place for responsibilities of record keeping and authorities for disposition?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the policy for record keeping or interview fiscal management staff responsible for this duty.
49.	Does the accounting system prevent obligations or expenditures of federal funds outside of the period of availability?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview the fiscal management staff about how they prevent expenditures from occurring outside the contract period.
50.	Are channels of communication established for people to report suspected improprieties in the use or disposition of equipment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview the management about how suspected improprieties in the use or disposition of equipment are prevented.
51.	Does management review the results of periodic inventories and follow-up on inventory discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the listing of inventory that the management reviewed before forwarding a list to TDLWD.
52.	Does management review property dispositions to ensure appropriate valuation and reimbursement to the federal awarding agency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review management's property valuation and reimbursement.
53.	Does the budgetary process consider the period of availability of federal funds as to both obligation and disbursement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the quarterly financial expenditure reports forwarded to the awarding agency.
54.	Are the entity's operations such that it is unlikely there will be federal funds remaining at the end of the period of availability?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review how fiscal management assures that federal funds received are expended before the contract is closed.
55.	Are un-liquidated commitments canceled at the end of the period of availability?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the directives of management to staff regarding un-liquidated commitments.
56.	Are un-liquidated balances periodically reported to the appropriate level of management, with follow-up?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if management has any decisions or directives for fiscal staff on un-liquidated balances.
57.	Are periodic reviews of expenditures before and after cut- off dates performed to ensure compliance with period of availability requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review expenditure goals to ensure that funds have been expended before the ending dates of funding availability.

58.	Does management perform periodic reviews of reports showing budget and actual expenditures for a specified period?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review expenditure reports provided to management for decision making.
59.	Is there a clear assignment of authority for issuing purchasing orders and contracting for goods and services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review duties of the fiscal staff.
60.	Does the procurement manual incorporate federal requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the procurement manuals of the subcontractor.
61.	Have procedures been established to identify risks arising from conflicts of interest, e.g., kickbacks, related-party transactions, bribery?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the conflict of interest policy of the sub- grantee and please check if staff are aware of this policy.
62.	Are conflict of interest statements maintained for individuals responsible for procurement of goods and services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check with staff responsible for this duty.
63.	Is there an official written policy for suspension and debarment that: a. Contains or references the federal requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the disbarment and suspension policy. If one is not available, please check to see if any written document is provided to staff regarding this provision.
	b. Prohibits the award of a sub-award, covered contract, or any other covered agreement for program administration, goods, services, or any other program purpose with any suspended and debarred party?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the disbarment and suspension policy. If one is not available, please check to see if any written document is provided to staff regarding this provision.
64.	Is the contractor's performance, with the terms, conditions, and specifications of the contract, monitored and documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if all contract terms and agreements are honored by the contractor.
65.	Are duties properly segregated between employees responsible for contracting and accounts payable and cash disbursing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the duties of employees in accounts payable and cash disbursement.
66.	Do supervisors review procurement and contracting decisions for compliance with federal procurement policies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the procurement procedures, or policy, or manual the contract uses.
67.	Are procedures established to verify that vendors providing goods and services under the award have not been suspended or debarred from federal procurement contracts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the procedure the contract uses to verify vendor's status.
68.	Are procurement actions appropriately documented in the procurement form TDLWD established?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check file and the documents to assure activities regarding procurements are documented.

69.	Has a system been established to assure that procurement documentation is retained for the time period required by the A-102 Common Rule, OMB Circular A- 110, award agreements, contracts, and program regulations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the procurement procedures and verify if the rules for procuring goods and services are followed.
70.	Does management periodically conduct independent reviews of procurements and contracting activities to determine whether policies and procedures are being followed as intended?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview management and find out if there are documents showing independent reviews of the financial system to ensure policies, etc. are followed.
71.	Are mechanisms in place to ensure that program income is properly recorded as earned and deposited in the bank as collected?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the quarterly financial reports submitted to the grantor.
72.	Does management compare program income with the budget and investigate significant differences?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview the involvement of management in this process.
73.	Does management perform an internal audit of program income?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview the involvement of management in this process.
74.	Is there a tracking system which reminds staff when reports are due?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if there is a tracking system alerting staff of due reports.
75.	Is the general ledger or other reliable records the basis for reports?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the documents used for reporting.
76.	Do supervisors review reports to assure the accuracy and completeness of data and information included in the reports?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if reports were provided to management or supervisors for their review.
77.	Is the required accounting method used to prepare the reports (e.g., cash or accrual)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the accounting method.
78.	Is there an established accounting or information system that provides for reliable processing of financial and performance information for federal awards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the financial system's capability to process financial information for reporting purposes.
79.	Do communications from contractors corroborate information included in the reports for federal awards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review contract terms.
80.	Is there a periodic comparison of reports with supporting records?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if financial reports have supporting documents.
81.	Do subrecipients demonstrate that: a. They are willing and able to comply with the requirements of the award?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if the sub-recipient is complying with the requirements of the contracts awarded

	b. They have accounting systems, including the use of applicable cost principles, and internal control systems adequate to administer the award?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
82.	Do official written policies exist establishing: a. Communication of federal award requirements to subrecipients?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the local policy established that covers the areas mentioned in questions 82 a,b,c, and d.
	b. Responsibilities for monitoring subrecipients?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	c. Processes and procedures for monitoring?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	d. A methodology for resolving subrecipient findings of subrecipient noncompliance or weaknesses in internal control?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	e. Requirements for and processing of subrecipient audits, including appropriate adjustment of pass-through entity's accounts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
83.	Is the subrecipients' compliance with audit requirements monitored by using techniques such as: a. Determining by inquiry and discussion whether the subrecipient met the threshold requiring an audit under OMB Circular A-133?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	b. If an audit is required, assuring that the subrecipient submits the report package or the documents required by the latest OMB circulars and/or the recipient's requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	c. If a subrecipient was required to obtain an audit in accordance with OMB Circular A-133 but did not do so, following-up with the subrecipient and taking appropriate actions (withholding further funding) until the audit requirements are met?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
84.	Has management identified for subrecipients the federal award information (e.g., CFDA title and number, award name, name of federal agency, amount of award) and applicable compliance requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review if the CFDA, title, number award amounts, etc., mentioned in question 111, are identified for contracts awarded
85.	Has management included in the agreements with subrecipients the requirement to comply with the compliance requirements applicable to the federal program including the audit requirements of OMB Circular A-133?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review if management has provided and circulated the OMB Circular A-133 to staff to make them aware of A-133 Administrative Requirement.

86.	Is subrecipient's compliance with federal program requirements monitored using such techniques as the following: a. Issuing timely management decisions for audit and monitoring findings to inform the subrecipient whether the corrective action planned is acceptable.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the monitoring techniques used by the subrecipient and check which of items the procedure fulfills.
	b. Maintaining a system to track and follow-up on reported deficiencies related to program funded by the recipient and ensuring that timely corrective action is taken.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	c. Maintaining regular contacts with subrecipients and making appropriate inquiries concerning the federal program.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	d. Reviewing subrecipient reports and following-up on areas of concern.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	e. Monitoring subrecipient budgets.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	f. Performing site visits to subrecipients to review financial and programmatic records and observe operations.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	g. Offering subrecipients technical assistance when needed.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
87.	Is subrecipient's compliance with federal program requirements monitored using such techniques as the following: a. Issuing timely management decisions for audit and monitoring findings to inform the subrecipient whether the corrective action planned is acceptable.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the monitoring techniques used by the subrecipient and check which of items the procedure fulfills.
	b. The description and program number for each program as stated in the Catalog of Federal Domestic Assistance (CFDA)?  Note: If the program funds include pass-through funds from another recipient, the pass-through program should be identified.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	c. A statement signed by an official of the subrecipient stating that the subrecipient was informed of, understands, and agrees to comply with applicable compliance requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
88.	Is a record keeping system in place to assure that documentation is retained for the time period required by the recipient?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the record keeping system of the recipient of federal funds.

89.	Are procedures in place to provide channels for subrecipients to communicate concerns to the pass-through entity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the procedure used to communicate concerns to sub-recipients.
90.	Has a tracking system been established to assure timely submission of required reporting, such as: financial reports, performance reports, audit reports, on-site monitoring reviews of subrecipients, and timely resolution of audit findings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check with management or staff for a tracking system.
91.	Are supervisory reviews performed to determine the adequacy of subrecipient monitoring?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview management or check written reviews by management about the financial monitoring at the subcontractors level.
92.	Is a current, fully executed, Workforce Investment Area (WIA) contract, along with all amendments, at the LWDA administrative office?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if contracts are kept at the administrative office.
93.	Does the LWDA have a documented system of contract administration which ensures that subcontractors perform within the terms of their subcontracts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the contract terms and agreements made to subcontractors.
94.	Are there mechanisms to ensure that no more than 5% of the youth funds serve non- disadvantaged youth?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the expenditures for the youth program.
95.	Does the payroll for summer youth participants exceed payment amount?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review contract document.
96.	Were expenditures charged to contract prior to the contract's beginning date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review beginning and end date to determine charges.
97.	Were there discrepancies in the participant's payroll enrolled in OJT/Incumbent Worker and NEG programs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review terms of contract.
98.	Has the LWDA developed a policy for employee travel expense payment? If not, is the LWDA following the State travel reimbursement policy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check what policy the LWDA or their employees are following?
99.	Does the rate of reimbursement for travel exceed the allowed state amount?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the policy or payments made for travel expenses.
100.	Is there a method used by the LWDA to maintain personnel costs for employees working in several programs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check time the distribution sheet employees submit to the LWDA.

101.	Does the financial record the LWDA submitted to TDLWD agree with the accounting records of the LWDA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please compare the accounting records of the LWDA to the records submitted to TDLWD.
102.	Has the LWDA met or exceeded the minimum 75% expenditure requirement for out-of-school youth in the Workforce Investment Area (WIA) Program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the active youth contract to determine the percentage.
103.	Are employees or administrators using WIA owned vehicles for normal commute from home to work?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the policy to find out if use of vehicles, from home to work, is part of a compensation plan.
104.	Does the LWDA have personal mobile phone policy when a staff member is approved to use personal phones for business?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please read either the state policy or LWDA policy about how personal phones are used for business related calls.
	How are payments for business calls calculated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
105.	Do staff or administrators use logs to distinguish personal & business call payments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check method of payment when personal mobiles are approved for making business calls.
106.	Was there excess cash on hand when examining drawdown amounts at the time of monitoring visit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check drawdown amount expenses to determine excess cash on hand.

PROGRAM QUESTIONNAIRE  
(ADULT)

Subrecipient: \_\_\_\_\_

Reviewer: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Executive Director Signature: \_\_\_\_\_ Fiscal Director Signature \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

**WORKFORCE INVESTMENT MONITORING TOOL  
PROGRAM QUESTIONNAIRE (ADULT)**

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Has the date of birth been verified and documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if any of these are kept in the file: Photocopies of Driver's License, Social Security Card, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card.
2.	Does male, 18yrs & born after 1- 01-60, have his Selective Service registration?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the register #/card is in the file of the participant.
3.	Has a veteran seeking any services been made aware of their entitlement to priority of services, and were they provided services to adult program services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the prior status of the individual seeking services (referencing) the Military Services form and DD214, as the attachment.
4.	Have the age and social security card been verified?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check for photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card.
5.	Is the date of application documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check e-CMATS which contains the WIA application date Alien Resident Card.
6.	Has the participant & the case manager signed the application?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check for application signed by participant and case manager.
7.	Has eligibility been verified?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check for photocopies of Driver's License, Social Security Card, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card.
8.	Has the Equal Employment Opportunity Statement been signed by the participant and the case manager?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Form requires signature from participant and case manager and in file of participant.
9.	Has the participant received core services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Documentation of all core services provided Examples in TEGL 7-99.

<b>10.</b>	Is there documentation to show that the participant did not find work after receiving career services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check documentation of all intensive services and evidence that participant was unable to obtain employment after initial core service. Please check random participant files.
<b>11.</b>	Has the Individual Employment Plan (IEP) been developed and is training linked to a demand occupation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The IEP requires signature from participant and case manager. Demand occupations should be provided in Local Plan.
<b>12.</b>	Has attendance during training been properly documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check attendance records.
<b>13.</b>	Are there case notes to demonstrate the progress of the participant?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check Case manager's notes providing evidence of participant's progress throughout services.
<b>14.</b>	Does the ITA meet the LWDA's requirement for time duration and cost limitation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check explanation of procedure for which funding amount was determined.
<b>15.</b>	Does the provider of training services appear in the list of eligible training providers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review Training Providers list on E&T Web site.
<b>16.</b>	Can the LWDA verify that the participant has not met other grant requirements before WIOA funding is made available? (Pell Grant, Scholarships, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check verification from the educational institution, and/or copy of financial aid application, documentation of other funding sources.
<b>17.</b>	How is the satisfactory progress of the participant in training documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review case manager participant's case notes.
<b>18.</b>	Does the participant file contain documentation of grievance and complaint procedures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check documentation and signature that the participant has received the grievance procedure.
<b>19.</b>	For files that VOS indicates supplemental data, is there an auditable record in the file?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check documentation of all training services, employment verification for 1st, 2nd and 3rd quarters after exit.
<b>20.</b>	Are career services made available by the American Job Center system (AJC) to all of the following, without eligibility requirements and regardless of the area of residency: <ul style="list-style-type: none"> <li>▪ All employers and job seekers?</li> <li>▪ Unemployment Insurance Claimants?</li> <li>▪ Veterans?</li> <li>▪ Migrant and seasonal farm- workers?</li> <li>▪ Individuals with disabilities?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policy and procedure.

<b>21.</b>	Does the AJC/Career Center System have sufficient staff, equipment, and oversight to deliver core services and applicable intensive services through: <ul style="list-style-type: none"> <li>• Self Service?</li> <li>• Facilitated self-service, and</li> <li>• Staff assisted service?</li> </ul> (Are the necessary resources available? Back-up resources?)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please make a visual confirmation and documented what was observed.
<b>22.</b>	Does the Career Center system have a documented procedure in place which ensures that staff provide UI claimants with the opportunity for career services and applicable intensive services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policy and procedure.
<b>23.</b>	Does the Career Center system have a documented procedure in place which ensures that staff: Receive information about UI claimant's ability or availability of work offered to them?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policy and procedure.
<b>24.</b>	Does the Career Center system Make career services available by the AJC/ Centers, by contracts with service providers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review the service provider's contracts
<b>25.</b>	Does the Career Center system have in place policies and procedures which ensure that AJCs provide: <ul style="list-style-type: none"> <li>• Coordinated resources and supportive services?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policy and procedure.
<b>26.</b>	<ul style="list-style-type: none"> <li>• Services to assist adults and dislocated workers?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>• Accurate information about the availability of supportive services in the LWDA?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>• Referral to activities which provide supportive services?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
<b>27.</b>	Does the LWDA system have policies and procedures in place which demonstrate that: <ul style="list-style-type: none"> <li>• Follow-up services are included in IEPs?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policy, procedure and random participant files
	<ul style="list-style-type: none"> <li>• Proposed monetary assistance during and throughout follow-up services are included in IEPs?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>• Criteria used to provide support services to individuals who are employed and earning self- sufficient wages?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
<b>28.</b>	Does the Career Center system have documentation which the One-Stop operator determines that: Participants need training services and have the skills and qualifications to successfully complete a training program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policy and procedure, i.e., Career services, employment search, and then training. D o e s n o t a p p l y t o I W T and Skill Shortage grants since these services are sometimes offered to people Incumbent Workers.

<b>29.</b>	Does the Career Center System have documentation which demonstrates that participants are determined to be eligible through state priority system?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policy and procedure.
<b>30.</b>	Does the LWDA have policies and procedures in place which ensure that a participant in a program shall not displace other employees: • Who are on layoff from similar jobs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policy and procedure
<b>31.</b>	Whom the employer has terminated with the intention of filling the position with subsidized and/or employees?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	Whose place for promotion is infringed upon?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
<b>32.</b>	Does the LWDA have in place policies and procedures regarding wage and labor standards, and health and safety standards that comply with WIA regulations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policy and procedure.
<b>33.</b>	Is there a criteria developed to target those most in need of training services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policy and procedure.
<b>34.</b>	Does the LWDA system have documentation showing the follow-up services for a minimum of 12 months following the first day of employment, to registered participants who are placed in unsubsidized employment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policies, procedures, random participant files. Ex: Case notes.
<b>35.</b>	Has the LWDA keyed all Workforce Investment Area (WIA) participants into the VOS System?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check participant's files and compare to information keyed into VOS.
<b>36.</b>	Does the LWDA have an employee who verifies data entered into VOS for accuracy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview data-entry person to verify accurate data entry.
<b>37.</b>	Have formal or informal training programs been established to provide the knowledge and skills necessary to determine activities and costs allowed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check documentation or notes that training has been provided to program staff on allowable activities.
<b>38.</b>	Are there written policies to provide direction for making and documenting eligibility determinations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check eligibility policy for Dislocated workers and VOS.
<b>9.</b>	Are eligibility objectives and procedures clearly communicated to employees?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if a memorandum was issued or another mechanism was used to communicate to employees the importance of accurate eligibility determination.
<b>40.</b>	Are authorized signatures, (manual or electronic) on eligibility documents periodically, reviewed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the participant has signed the eligibility form and the form is reviewed for accuracy.

41.	Is access to eligibility records limited to appropriate persons?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the records of participants are kept in a safe place.
42.	Are manual criteria checklists or automated processes used in making eligibility determinations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the eligibility process is performed manually or electronically or if both manual and electronic processes are used.
43.	Is the information used in making eligibility determinations verified for accuracy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if eligibility process is checked by staff other than the person who determines eligibility.
44.	Are there procedures to ensure the accuracy and completeness of data used to determine eligibility requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if the subcontractor has a process to check the accuracy of participants eligibility.
45.	Are program quality-control procedures performed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the subcontractor has staff (fiscal and program quality control staff) designated to ensure all program requirements are accurate.
46.	Are program managers provided with applicable requirements and guidelines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if manuals with program guidelines are issued to train program managers including dates on which training was provided.
47.	Are conflict of interest statements maintained for individuals responsible for determining eligibility?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if staff determining eligibility are aware of the provisions of "conflict of interest" when determining eligibility.
48.	Does the LWDA prohibit discrimination based on race, sex, or age in its employment practices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if EEO posters are displayed in the reception area of the LWDA office, in the career center or wherever WIA services are offered.
49.	Is the date of application captured in VOS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please confirm the date through VOS.
50.	Are any participants enrolled as underemployed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please confirm through e-CMATS or the file of the participant.
	If yes, is there documentation of wages being below the self- sufficient wage estimate by LWDA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see participant's file and documentation, or check indicator or case notes.
50.	Are any participants enrolled as underemployed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please confirm through e-CMATS or the file of the participant.

<b>50.</b>	Are any participants enrolled as underemployed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please confirm through e-CMATS or the file of the participant.
	If yes, is there documentation of wages being below the self- sufficient wage estimate by LWDA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see participant’s file and documentation, or check indicator or case notes.
<b>51.</b>	If a participant is exited, has appropriate follow-up been documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the case notes for follow- up.
<b>52.</b>	Have all grant requirements been verified?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review grant contract and content and actual services.
<b>53.</b>	Is there sufficient information recorded by Case Managers to follow progress of a participant?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the info or statements made by Case Manager in e-CMATS.
<b>54.</b>	Have participants without activities for 90 days been exited out of VOS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the exit indication/or case notes.
<b>55.</b>	Are there participants who are not exited out of the program after all activities closed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check “begin” and “end” planned dates or case notes.

**PROGRAM QUESTIONNAIRE  
(DISLOCATED WORKER)**

Subrecipient: \_\_\_\_\_

Reviewer: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Executive Director Signature: \_\_\_\_\_ Fiscal Director Signature \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

**WORKFORCE INVESTMENT MONITORING TOOL  
PROGRAM QUESTIONNAIRE (DISLOCATED)**

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Has the date of birth been verified and documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if any of these are kept in the file: Photocopies of Driver's License, Social Security Card, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card.
2.	If male, 18yrs & born after 1-01-60, has he registered for Selective Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review and verify the selective service registration.
3.	Has a veteran seeking services received priority to such services under the dislocated worker WIA program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the prior status of the individual seeking services including documents such as Certificate; DD214, Report of Transfer or Discharge Paper.
4.	Have the age and social security card been verified?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card.
5.	Is date of WIA Application captured in e-CMATS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check see e-CMATS page which contains WIA application date.
6.	Is the date of hard copy application documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check application signed by participant and case manager.
7.	Has eligibility been verified? Based on the Eligibility of WIOA? Please refer to the Dislocated worker eligibility documented in this guide.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check Separation Notice, UI records, Public Announcement of layoff, etc.
	For verification of eligibility purposes for individuals from mass layoffs, please use the documentation stated on the right.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check Separation Notice, UI records, Public Announcement of layoff, etc.
	For Verification of eligibility purposes for a spouse of a dislocated worker, please use the documents stated on the right	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check Separation notice of spouse and a marriage certificate.

8.	Did the participant and case manager sign Equal Employment Opportunity Statement (English/Spanish), and is the document maintained in the participant's files?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the form requiring signature from participant and the case manager.
9.	Has the participant received career services and is it documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check documentation of all career services offered and case manager notes.
10.	Is there documentation that after career service the individual was unable to obtain employment and was the individual referred to Training Services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check documentation of career services and evidence that participant was unable to obtain employment after initial service.
11.	Have Individual Employment Plans been developed after career services ore services, and is training linked to a demand occupation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The IEP requires a signature from participant and from the case manager. Demand occupations should be provided within Local Plan. Please check for these.
12.	Has Pell Grant, Wilder-Naifeh, Hope, TSAC aid been considered in assisting the students financial needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check for verification of the educational institutional, and/or copy of financial aid application.
13.	Has the subcontractor developed an IEP for his or her participants?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if an employment development plan has been established for each participant.
14.	Has the subcontractor followed the IEP that was developed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if there was follow-up to ensure that the IEP was followed.
15.	Has attendance during training been properly documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the attendance records.
16.	Are Case Notes in VOS adequate to follow participant's progress?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check case manager's notes providing evidence of participant's progress throughout services.
17.	Does the ITA meet the LWDA's requirement for time duration and cost limitation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review Training Providers list on E&T Web site.
18.	Can the LWDA verify that the participant has not met other grant requirements such as partner services before WIOA funding is made available?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check for verification from the educational institution, and /or a copy of the financial aid application, documentation of other funding sources.
19.	How is the satisfactory progress of the participant in training documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review participant's case notes.
20.	Does the participant file contain documentation of grievance and complaint procedures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check for this form that requires the signature of the participant and of the case manager.
21.	For files that VOS indicates as supplemental data, is there is an auditable record in the file?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check for documentation of all training services, employment verification for 1st , 2nd and 3rd quarters after exit.

22.	Has the LWDA developed a policy for relocation assistance and the rationale for the policy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policy and procedure.
23.	Has the LWDA provided relocation assistance to any dislocated worker? If yes, is there a record documenting that the worker is receiving or will receive 75% of his previous wage in the new location of employment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review relocation assistance documentation.
24.	Are authorized signatures (manual or electronic), that are on the eligibility documents, periodically reviewed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the participant has signed the eligibility form.
25.	Is access to eligibility records limited to appropriate persons?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the records of participants are kept in a safe area.
26.	Is the information used in making eligibility determinations verified for accuracy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the eligibility process is checked by staff other than the person who determines eligibility.
27.	Are channels of communication established for people to report suspected eligibility improprieties?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see for the policy or memorandum issued regarding suspected eligibility improprieties.
28.	Are program quality control procedures performed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Does more than one member of the staff check for errors in the participant's file?
29.	Are conflict of interest statements maintained for individuals responsible for determining eligibility?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if staff is aware of the conflict of interest.
30.	Does the LWDA prohibit discrimination based on race, sex, or age in its employment practices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if EEO posters are posted and if participants are made aware of EEO provisions.
31.	Is date of application captured in VOS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please confirm if the date of application, for a participant, is captured in e-CMATs.
32.	Does the provider of training services appear in the list of eligible training providers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the subcontractor is approved on the training providers list. (Check the state's Web site.)
33.	If participant is exited, has appropriate follow-up been documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if grant requirements are followed and if there was a follow-up of participants during program and after exit.
34.	If yes, is there documentation of wages being below self-sufficient wage est. by LWDA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the documentation used to determine the self-sufficient wage.
35.	Is there sufficient information recorded by Case Managers to follow progress of a participant?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the info or statements made by Case Managers in e-CMATs.
36.	Have participants, without activities for 90 days, been exited out of VOS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the exit indication/or case notes.
37.	If a dislocated worker is in OJT training, are the payments and hours of training as indicated in the contract terms?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the contract terms.
38.	Does the OJT contract have assurances attached to the contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if the OJT contracts have assurances attached to the contract being monitored.

# PROGRAM QUESTIONNAIRE (YOUTH)

Subrecipient: \_\_\_\_\_

Reviewer: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Executive Director Signature: \_\_\_\_\_ Fiscal Director Signature \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

**WORKFORCE INVESTMENT MONITORING TOOL  
PROGRAM QUESTIONNAIRE (Youth)**

	QUES	YES	NO	N/A	PARAMETERS
1.	Has the date of birth been captured for all youth?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please look for photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card.
2.	If male, 18yrs & born after 1-01-60, has he registered for Selective Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please look for photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card, Selective Service
3.	Did LWDA verify age and social security number?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please look for photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/ Alien Resident Card.
4.	Is the date of WIOA application captured in VOS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please look for the e-CMATS page which contains WIA application
5.	Did participant sign and date the application?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please look for the participant's signature and the signature of the case
6.	Has eligibility been verified?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see the eligibility criteria used to verify eligibility.
7.	Did the participant and the case manager sign the Equal Employment Opportunity Statement (English/Spanish), and is	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the participant and the case managers have signed the EEO form.
8.	Were career services provided for 18-24 youth who want to find employment documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please document all of all core services provided.
9.	Have Individual Service Strategies been developed after career services and is training linked to a demand occupation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please look for required signatures from participant and case manager for the IEP. Demand occupations should

10.	Has Individual Development Plan been developed based off of an objective assessment of the academic levels, skill levels, and service needs of each participant?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see the services for youth in the youth section of this manual.
11.	Are services, provided to youth, based on service needs documented, in the Individual Service Strategy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see services for youth under WIOA in the youth section of this manual.
12.	If a participant has disabilities, is the LWDA considering him as a family of one?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the documentation used for verifying disability.
13.	Has attendance during training been properly documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify attendance records/case notes.
14.	Are case notes being utilized?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see case manager's notes providing evidence of participant's progress throughout services.
15.	Does the ITA meet the LWDA's requirement for time duration and cost limitation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policy and procedure; request explanation of procedure for which funding
16.	Has the youth been tested for a basic skills deficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see test results.
17.	How does the LWDA define additional assistance to youth?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the LWDA's definition of youth needing
18.	How is the satisfactory progress, of the participant in training, documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review participant's case notes.
19.	Does the participant file contain documentation of grievance and complaint procedures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check for this form that requires the signature of the participant and the signature of the
20.	Were youth-service providers obtained through a competitive procurement basis?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the provider list used by the subcontractor.
21.	Do out-of-school youth meet the Criteria mentioned in this manual:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review the youth service section in this manual.
22.	Are youth funds, amounting to 75% being used to serve the out-of-school population?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the allocation method used to ensure that 75% of funds are used to serve out-of-school; use the VOS Report as an additional reference.

23.	Are all the fourteen required elements of the Youth Program being made available in the Local Area and listed in the Youth section of this manual?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the LWDA's current plan; refer to literature and documentation, provided by administrative office, detailing which required services are available in the LWDA; provide a listing of subcontractors that are providing these elements.
24.	Is the Youth Council or the Standing Committee meeting regularly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if a parent of a youth, also a youth is represented in the youth council or the standing committee.
25.	Is there a quorum when contracts are approved and Request for Proposals (RFPs) issued?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
26.	If the LWDA has youth participants with ITAs (Individual Training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see the age of youth for training approval.
	Accounts), are the participants: a. Age 18 and above?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	b. Was the youth dually enrolled in the adult program or the dislocated worker program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the youth is enrolled in the adult program or dislocated worker program; verify that eligibility for the DW has been met.
27.	Does the LWDA use the statewide waiver for older youth enrolled in the previous WIA program to receive ITAs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the LWDA has provided older youth skills upgrade.
28.	Does the LWDA system provide youth referrals for supportive services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see the referral process used.
	Does the LWDA system provide objective assessments for youth participants and work experiences for youth such as: ▪ Instruction in employability skills?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see the file of youth to verify these stated activities (on the left).
	▪Exposure to the aspects of industry such as team work, internship, paid and unpaid community service, or job shadowing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above

29.	Does the LWDA system provide objective assessments, for youth participants, which cover academic levels, skill levels, and service needs of each participant and which will also include a review of: <ul style="list-style-type: none"> <li>• Basic skills?</li> <li>• Occupational skills?</li> <li>• Prior Work Experience?</li> <li>• Employability?</li> <li>• Interest?</li> <li>• Aptitudes?</li> <li>• Supportive service needs?</li> <li>• Developmental needs</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see WIA Section 129(c)(1)(A).
30.	Does the LWDA system include Youth Program components which are included in the WIOA program included in this manual in the Youth section?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see youth file to ensure the 14 youth elements were made available and provided to youth.
31.	Are there written policies to provide direction for making and documenting eligibility determinations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see the eligibility indicator marked in e- CMATS and in the file of the participant.
32.	Are there procedures to calculate eligibility amounts that are consistent with program requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see the mechanism that the subcontractor uses to calculate performance measures.
33.	Are eligibility objectives and procedures clearly communicated to employees?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if a memorandum was issued or other mechanisms was used to communicate to employees the
34.	Are authorized signatures (manual or electronic) on eligibility documents periodically reviewed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the participant has signed the eligibility form.
35.	Is access to eligibility records limited to appropriate persons?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the records of participants are kept in a safe place.
36.	Does the LWDA provide work experience for youth?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if case management's notes indicate this youth activity.
37.	Is the LWDA paying wages and benefits for youth in work experience?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the hourly wage statements in the case notes or the type of activity in VOS.

38.	Does the LWDA have a year round program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the activity states that it is year round.
39.	Are youth provided follow-up services for 12 months after program exit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see dates, agenda or staff time used for training regarding eligibility.
40.	Does the LWDA have a separate Summer Youth Program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the "beginning" and "ending" dates.
41.	Does the LWDA prohibit discrimination based on race, sex, or age in its employment practices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if posters regarding EEO are posted in the offices where participants are served and welcomed.
42.	Are youth given the opportunity to register for apprenticeship programs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if apprenticeship is part of the training list.
43.	Have all grant requirements been verified?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see the process used by staff to verify that program requirements are met.

# PROGRAM QUESTIONNAIRE (STATEWIDE PROGRAMS)

Subrecipient: \_\_\_\_\_

Reviewer: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Executive Director Signature: \_\_\_\_\_ Fiscal Director Signature \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

**WORKFORCE INVESTMENT MONITORING TOOL  
PROGRAM QUESTIONNAIRE (Asset Works)**

	QUESTION	YES	NO	N/A	PARAMETERS
1	Is the subcontractor for this grant in the local area for the LWDA that received these grants?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check with program staff or the contracting office in the LWDA.
2	Has the worker received skills upgrade training?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify with the information the LWDA received from the employer.
3	Did the subcontractor submit its monthly expenditures in a timely manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review the reports submitted to the LWDA.
4	If any, did the LWDA refer new employees for skills upgrade?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check in the file for the participants or in CMATs or check with staff responsible for the grant.

Subrecipient: \_\_\_\_\_

Reviewer: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Executive Director Signature: \_\_\_\_\_ Fiscal Director Signature \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

**WORKFORCE INVESTMENT MONITORING TOOL  
PROGRAM QUESTIONNAIRE (Youth)**

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Has the date of birth been captured for all youth?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please look for photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card.
2.	If male, 18yrs & born after 1-01-60, has he registered for Selective Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please look for photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card, Selective Service Website or Selective Service card.
3.	Did LWDA verify age and social security number?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please look for photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card.
4.	Is the date of WIOA application captured in VOS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please look for the e-CMATS page which contains WIA application date.
5.	Did participant sign and date the application?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please look for the participant's signature and the signature of the case manager.
6.	Has eligibility been verified?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see the eligibility criteria used to verify eligibility.
7.	Did the participant and the case manager sign the Equal Employment Opportunity Statement (English/Spanish), and is it maintained in participant's file?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the participant and the case managers have signed the EEO form.
8.	Were career services provided for 18-24 youth who want to find employment documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please document all of all core services provided.
9.	Is training linked to a demand occupation for out of school youth?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please look for required signatures from participant and case manager for the IEP. Demand occupations should be provided within Local Plan.

10.	Are services, provided to youth, based on service needs documented, in the Individual Service Strategy, as a result of an objective assessment? Are employment goals and appropriate achievement objectives documented, taking into account the assessment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see services for youth under WIOA in the youth section of this manual.
11.	If a participant has disabilities, is the LWDA considering him as a family of one?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the documentation used for verifying disability.
12.	Has attendance during training been properly documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify attendance records/case notes.
13.	Are case notes being utilized?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see case manager's notes providing evidence of participant's progress throughout services.
15.	Does the ITA meet the LWDA's requirement for time duration and cost limitation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policy and procedure; request explanation of procedure for which funding amount was determined.
16.	Has the youth been tested for a basic skills deficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see test results.
17.	How does the LWDA define additional assistance to youth?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the LWDA's definition of youth needing additional assistance
18.	How is the satisfactory progress, of the participant in training, documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review participant's case notes.
19.	Does the participant file contain documentation of grievance and complaint procedures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check for this form that requires the signature of the participant and the signature of the case manager.
20.	Were youth-service providers obtained through a competitive procurement basis?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the provider list used by the subcontractor.
21.	Do out-of-school youth meet the Criteria mentioned in this manual:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review the youth service section in this manual.
22.	Are youth funds, amounting to 75% being used to serve the out-of-school population?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the allocation method used to ensure that 75% of funds are used to serve out-of-school; use the VOS Report as an additional reference.

23.	Are all the fourteen required elements of the Youth Program being made available in the Local Area and listed in the Youth section of this manual?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the LWDA's current plan; refer to literature and documentation, provided by administrative office, detailing which required services are available in the LWDA; provide a listing of subcontractors that are providing these elements.
24.	Is the Youth Council or the Standing Committee meeting at least once a year to provide information to the local board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if a parent of a youth, also a youth is represented in the youth council or the standing committee to present their concerns.
25.	B. Is there a quorum when contracts are approved and Request for Proposals (RFPs) issued?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
26.	If the LWDA has youth participants with ITAs (Individual Training Accounts), are the participants: a. Age 18 and above?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see the age of youth for training approval.
	b. Was the youth dually enrolled in the adult program or the dislocated worker program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the youth is enrolled in the adult program or dislocated worker program; verify that eligibility for the DW has been met.
	Does the LWDA use the statewide waiver for older youth enrolled in the previous WIA program to receive ITAs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the LWDA has provided older youth skills upgrade.
27.	Does the LWDA system provide youth referrals for supportive services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see the referral process used.
28.	Does the LWDA system provide objective assessments for youth participants and work experiences for youth such as: ▪ Instruction in employability skills?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see the file of youth to verify these stated activities (on the left).
	▪Exposure to the aspects of industry such as team work, internship, paid and unpaid community service, or job shadowing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above

29.	Does the LWDA system provide objective assessments, for youth participants, which cover academic levels, skill levels, and service needs of each participant and which will also include a review of: <ul style="list-style-type: none"> <li>• Basic skills?</li> <li>• Occupational skills?</li> <li>• Prior Work Experience?</li> <li>• Employability?</li> <li>• Interest?</li> <li>• Aptitudes?</li> <li>• Supportive service needs?</li> <li>• Developmental needs</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see WIA Section 129(c)(1)(A).
30.	Does the LWDA system include Youth Program components which are included in the WIOA program included in this manual in the Youth section?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see youth file to ensure the 14 youth elements were made available and provided to youth.
31.	Are there written policies to provide direction for making and documenting eligibility determinations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see the eligibility indicator marked in e-CMATS and in the file of the participant.
32.	Are there procedures to calculate eligibility amounts that are consistent with program requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see the mechanism that the subcontractor uses to calculate performance measures.
33.	Are eligibility objectives and procedures clearly communicated to employees?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if a memorandum was issued or other mechanisms was used to communicate to employees the importance of accurate eligibility determination.
34.	Are authorized signatures (manual or electronic) on eligibility documents periodically reviewed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the participant has signed the eligibility form.
35.	Is access to eligibility records limited to appropriate persons?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the records of participants are kept in a safe place.
36.	Does the LWDA provide work experience for youth?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if case management's notes indicate this youth activity.

37.	Is the LWDA paying wages and benefits for youth in work experience?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the hourly wage statements in the case notes or the type of activity in VOS.
38.	Does the LWDA have a year round program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the activity states that it is year round.
39.	Are youth provided follow-up services for 12 months after program exit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see dates, agenda or staff time used for training regarding eligibility.
40.	Does the LWDA have a separate Summer Youth Program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the “beginning” and “ending” dates.
41.	Does the LWDA prohibit discrimination based on race, sex, or age in its employment practices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if posters regarding EEO are posted in the offices where participants are served and welcomed.
42.	Have all grant requirements been verified?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see the process used by staff to verify that program requirements are met.

# PROGRAM QUESTIONNAIRE (INCUMBENT WORKER)

Subrecipient: \_\_\_\_\_

Reviewer: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Executive Director Signature: \_\_\_\_\_ Fiscal Director Signature \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

**WORKFORCE INVESTMENT MONITORING TOOL  
PROGRAM QUESTIONNAIRE (Incumbent Worker)**

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Does local contract contain a "Lobbying" clause?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
2.	Does local contract have a "Nondiscrimination" clause?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
3.	Does local contract have a "Public Accountability" clause?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
4.	Does local contract have a "Public Notice" clause?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
5.	Does local contract have a "Records" clause?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
6.	Has the participant been entered into VOS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
7.	Has the approved training been completed as stated in application?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
8.	Has the number of full time employees to be trained been met?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
9.	Has the company met all proposed fiscal obligations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
10.	Were approved budget items reimbursed upon presentation of adequate documentation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
11.	Was all training completed prior to September 30 of the current program year?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
12.	Has employer signed a Layoff Aversion Attestation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
13.	Has the LWDA gotten approval from the local board to use up to 10% of the adult or dislocated worker funds for IWT & has it advised the state of such approval? (Local formula funding only)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.

14.	Has the LWDA received final approval from the TN Department of Labor & workforce development? ( <u>Local formula funding only</u> )	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
15.	When using Adult funds for incumbent worker training, the LWDA is restricted to serving lower- income (being 200% of the lower Living Standard Levels -- LLSIL). Is agency in compliance with this statement? ( <u>Local formula funding only</u> )	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
16.	Has the LWDA used the current IWT application provided by Workforce Development? ( <u>Local formula funding only</u> )	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
17.	Has the company provided documentation of the 50% match?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
18.	Has the company stayed within the \$25,000 cap?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.
19.	Has the LWDA completed the Incumbent Worker Application Review?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to contract terms.

# PROGRAM QUESTIONNAIRE (DEI)

Subrecipient: \_\_\_\_\_

Reviewer: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Executive Director Signature: \_\_\_\_\_ Fiscal Director Signature \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

**WORKFORCE INVESTMENT MONITORING TOOL  
PROGRAM QUESTIONNAIRE (DEI)**

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Has the DEI grant recipient hired a full-time Disability Resource Coordinator leading the effort of this project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview management or contact the DEI lead in the local area.
2.	Is the American Job Center /American Employment Network programmatically and physically communicative and conducive to the needs of a person with disability?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify if the office, where services are provided, is accessible to people with disabilities.
3.	Has the AJC in the area been designated as an Employment Net Work?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview management and verify the agreement with SSI designating the CC as an Employment Net Work.
4.	Has the DRC coordinated with other service providers and formed an Integrated Resource Team to meet the needs of a customer with a disability?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify the existence of a Resource team and the minutes taken or verify with dates of meeting scheduled.
5.	Have the services for people with disabilities been coordinated with other programs to meet all of the needs of the person with a disability?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify the referral system established or the mechanisms used by the career center to refer a person with a disability to other service providers.
6.	Does the contractor have policies and procedures in place to ensure that adults and youth with disabilities, especially those who are ticket ticket-to-work holders, will be assisted?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify with staff or management the number of people with disabilities with tickets assisted in finding work or assisted with their special needs.

7.	Has the person with a disability been assessed to determine his/her strengths and interests?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the Individual Employment Plans and records of people with disabilities to employment services.
	Does this person meet the requirements, identified by area businesses, for unsubsidized employment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the Individual Employment Plan and record of referral of people with disabilities to employment services.
8.	Is the LWDA capturing accurate and required data elements in VOS for persons with disabilities receiving WIA services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify in VOS that the career center staff has recorded the data elements of people with disabilities in VOS.

**PROGRAM QUESTIONNAIRE**  
(Statewide and Reports requested for any of  
the WIOA or National Discretionary Funds)

Subrecipient: \_\_\_\_\_

Reviewer: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Executive Director Signature: \_\_\_\_\_ Fiscal Director Signature \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

**WORKFORCE INVESTMENT MONITORING TOOL  
PROGRAM QUESTIONNAIRE (STATEWIDE and Reports)**

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Has the contractor submitted quarterly reports on a timely basis?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify if the required quarterly reports for expenditures and obligations have been sent to TDLWD on a timely basis.
2.	Is the LWDA collecting statewide information on eligible individuals in the VOS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify if data for persons served by statewide funds are collected in VOS.
3.	Does the targeted population reach those who are underemployed, because of their lack of certification, or expect to become employed, as a result of their participation in the program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see program results or reports submitted on a monthly or quarterly basis.
4.	Has the contractor submitted quarterly reports on a timely basis?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify with management and check the required dates for submission of fiscal and program dates.
5.	Is LWDA collecting statewide information on eligible individuals in VOS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review information keyed into VOS .
6.	In providing participant services, has the LWDA met the eligibility requirements of the target group to be served through the incentive grant?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the incentive plans of the sub-grantee and check to see if the target group is served.
7.	Are quarterly reports submitted in a timely manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify that quarterly reports were submitted in a timely fashion.

8.	If the quarterly expenditure goals have not been met, has the contractor/LWDA provided an explanation, in writing, to the state in the quarterly report?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check with the administrative to see if the state was provided with an explanation for the low expenditure.
9.	Is the information regarding participant eligibility and services being accurately keyed into VOS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the eligibility and services, under statewide grants and incentive grants, are being keyed accurately in VOS.

PROGRAM QUESTIONNAIRE  
(NEG/TAA)

Subrecipient: \_\_\_\_\_

Reviewer: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Executive Director Signature: \_\_\_\_\_ Fiscal Director Signature \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

**WORKFORCE INVESTMENT MONITORING TOOL  
PROGRAM QUESTIONNAIRE (NEG/TAA)**

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Is the LWDA making progress integrating services provided by TAA/NAFTA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review local plan, observe procedural process.
2.	What is the procedure at the local level to respond to plant closures and mass layoffs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review local plan; review and document the procedural process.
3.	Is the local rapid response coordinator submitting information, about area rapid response activities, to the Employment and Training section of the TDLWD?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review records of rapid response activities; discuss with the rapid response coordinator if available.
4.	Are needs surveys distributed and collected before mass meetings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review surveys and discuss this mass-meeting procedure with the local administrator/rapid response coordinator.
5.	Does the local, rapid response system include, in its response, these activities:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please discuss and review this procedural process with the local administrator/rapid response coordinator.
	<ul style="list-style-type: none"> <li>Immediate and on-site contact with the employer, workers, and the local community?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>Provision of information and access to it?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>Unemployment compensation benefits, One-Stop system services, and employment and training activities?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above

	<ul style="list-style-type: none"> <li>Guidance or financial assistance setting up a labor Management Committee?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>Provision of assistance to the local board to develop a coordinated response?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
6.	<p>Does the contractor have policies and procedures in place to ensure that individuals, who apply for NEG services, meet the following eligibility guidelines?</p> <ul style="list-style-type: none"> <li>The dislocated worker</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policy and procedures.
	<ul style="list-style-type: none"> <li>The civilian employee of the Department of Defense</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>The long-term unemployed as a result of disaster</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>The non-managerial employee with the Department of Defense</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>The armed-forces member at risk of termination due to reduction in defense expenditures</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>The one who is not entitled to retire or to retain pay (incident to a separation)</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>The one who has applied for employment and training assistance before the end of the 180 day period?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
7.	<p>Are these targeted populations reached:</p> <p>a. The underemployed, because of its lack of certification?</p> <p>b. The unemployed, but expect to become employed, as a result of their participation in the program?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review local report and consult with local administrator.

8.	Does the LWDA system have documentation in place which demonstrates the integration of services funded under TAA/NAFTA with the services funded under WIA Title I/ Wagner-Peyser. These services are: <ul style="list-style-type: none"> <li>• Eligibility determinations</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review documentation that demonstrates integration of services; observe procedural methods used in the LWDA system.
	• Re-employment plans	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	• Job-search-allowance applications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	• Relocation-allowance applications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	• Case Management	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	• Training-waiver options.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
9.	Were equipment-purchasing procedures followed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see the TDLWD Financial Guide.

PROGRAM QUESTIONNAIRE  
(EEO)

Subrecipient: \_\_\_\_\_

Reviewer: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Executive Director Signature: \_\_\_\_\_ Fiscal Director Signature \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

**WORKFORCE INVESTMENT MONITORING TOOL  
PROGRAM QUESTIONNAIRE (EEO)**

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Has the LWDA appointed its equal opportunity officer for WIA Title I services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify the name of each staff member with this responsibility and the name identified on poster. Please see a copy of letter to appointed staff.
2.	Has the LWDA provided reasonable accommodations for persons with disability? If not, see #16 (below).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify this for all sites included in sample.
3.	Does the LWDA provide initial and continuing notice (using the required nondiscrimination language) that it does not discriminate on any prohibited ground?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please look (or listen to) materials such as posters, broadcasts, RFPs, closed caption, etc.
4.	Does the LWDA publish or broadcast program information in the news media, and if so, does the LWDA indicate in the publications and broadcasts: <ul style="list-style-type: none"> <li>• That the WIOA funded program or activity in question is an equal opportunity employer/program?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review of articles, text for PSAs, or any other form of media, i.e. newspaper articles, examples, etc.
	<ul style="list-style-type: none"> <li>• That auxiliary aids and services are available upon request to individuals with disabilities?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above

5.	Has the LWDA applied Analysis to its programs in order to determine how best to deliver language assistance to individuals who are Limited English Proficient?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check for the written policy stating review of 4-Factor Analysis and conclusions.
6.	If the Analysis indicates the need for language assistance services, does the LWDA have in place one or more of the following oral interpretation services:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review or process that LWDA follows. Example: "I speak..." cards.
	• Bi-lingual staff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	• Staff interpreters?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	• Contract interpreters? Or...	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same a above
	• Telephone interpreter line?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same a above
7.	Do the LWDA's written translation procedures fall within the "Safe Harbor" provisions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review text or analysis and documentation of census count.
8.	Does the LWDA have policies and procedures in place which ensure that interpreters and/or interpreter services provide interpretations as follows:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policies and procedures and the listing of certified interpreters.
	• With demonstrated proficiency and ability to interpret in both English and the other language, and the ability to identify consecutive, summary, simultaneous, or sight interpretations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	• With knowledge of specialized terms and concepts of the program, vocabularies and phrases used by the LEP person?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
9.	Does the LWDA have policies and procedures in place which ensure the following:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policies and procedures and the listing of certified interpreters, including payment statement.
	• Those interpreters must certify that they will deliver interpretations that are accurate and not biased?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	<ul style="list-style-type: none"> <li>Those interpreters shall accept payment for services only from the LWDA and never from the client?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
10.	<p>. After applying the 4-Factor Analysis, and if the need for translation of vital documents is reasonable and necessary, does the LWDA provide written translations of :</p> <ul style="list-style-type: none"> <li>Consent and complaint forms?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review documents and/or posters.
	<ul style="list-style-type: none"> <li>A list of One-Stop partners and services offered?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>Appeals documents?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>Notices requiring a response from clients?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>Information on the right to file complaints of discrimination?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>Information on the provision of services to individuals with disabilities?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>State wage and hour and safety and health information?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>Notices of free language assistance?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
11.	<p>Does the LWDA have procedures and policies in place which ensure planning and development of:</p> <ul style="list-style-type: none"> <li>Methods of identifying LEP individuals who need language assistance?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review these policies and procedures.
	<ul style="list-style-type: none"> <li>Training for staff on the available language services and how to use them?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>Easily-accessible and widely-known notices of free language assistance?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> <li>Training staff on monitoring interpreter activity?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above

12.	Does the covered LWDA have policies, procedures, and auxiliary aids and services in place which ensure the reasonable and necessary delivery of program services to qualified individuals who have physical and/or mental impairments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policies and procedures, all media, including videos, DVDs, etc
13.	Does the covered LWDA have policies and procedures in place that ensure that individuals with qualifying disabilities will be referred for auxiliary aids and services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review policies and procedures.
14.	Does the LWDA have in place communication devices, such as TTY or TDD, or an equally effective communication system, for participants with a hearing impairment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please visually confirm that these devices or referral phone number are available.
15.	If the LWDA has determined that the provision of accommodations would fundamentally alter the delivery of program, service, or activity, then does the LWDA have a written statement which details the reasons for reaching this conclusion?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check for a statement or policy regarding analysis or resources.
16.	Does the LWDA have clearly visible signage, at the primary entrances of each inaccessible facility that refers individuals, with disabilities, to information about accessible facilities?				Please visually confirm that this signage is in place.
17.	Does the LWDA have the international symbol for accessibility at the primary entrances of each accessible facility?				Please visually confirm that this signage is in place.
18.	Do the LWDA's published personnel policies and procedures prohibit actions defined in Section 37.11 of the implementing regulations? These are:  <ul style="list-style-type: none"> <li>• Intimidation and retaliation for filing a complaint or furnishing information regarding administration of a WIOA assisted program, service, or activity.</li> </ul>				Please review these policies and procedures for personnel.

19.	Does the LWDA have clearly visible signage, at the primary entrances of each inaccessible facility that refers individuals, with disabilities, to information about accessible facilities?				Please visually confirm that this signage is in place.
	<ul style="list-style-type: none"> <li>Primary entrances?</li> </ul>				Same as above
	<ul style="list-style-type: none"> <li>Internal memoranda, hard copy and electronic?</li> </ul>				Same as above
	<ul style="list-style-type: none"> <li>Handbooks or manuals?</li> </ul>				Same as above
	<ul style="list-style-type: none"> <li>Made available to each participant and included in the participant's file?</li> </ul>				Same as above
	<ul style="list-style-type: none"> <li>Made available, in appropriate formats, to individuals with visual impairments</li> </ul>				Same as above
20.	Do the LWDA's orientations and other presentations, to new employees, participants, employers and the general public, include a discussion of the nondiscrimination and equal opportunity provisions applicable to WIA programs?				Review internal memorandum to staff; manual published regarding nondiscrimination/EEO and other related provisions to train new staff Please visually confirm these.
21.	Does the LWDA system have a complaint log which is used to record any complaints of discrimination?				Please review this complaint log.
22.	Does the LWDA have documentation to ensure that all OJT plans, contracts, and other similar agreements are non-discriminatory and contain provisions regarding non-discrimination and equal opportunity?				Please review this complaint log.
23.	How does the LWA provide disability awareness training for designated staff at the one-stop center?				Please learn who is trained, when is the training held, and how frequently is the training held.
24.	Has the contract agency received any discrimination complaints during the last fiscal year or during the current contract year? Explain.				Please review such documents and note the appropriate explanation.

25.	What assurances of compliance have been signed by the agency?				Please review such documents and note the appropriate explanation.
	When and by who were they signed?				
26.	What documentation does the agency keep as proof of its non-discriminatory status?				Please review documents, and/or previous audits, and corrective actions for such documentation or proof.



## Webliography

### **LWDA 1**

<http://www.ab-t.org/>

<http://www.tn.gov/workforce/section/jobs-and-education>

### **LWDA 2**

<http://www.ws.edu/>

<http://www.tn.gov/workforce/section/jobs-and-education>

### **LWDA 3**

<http://www.knoxcac.org>

### **LWDA 4**

<http://www.ethra.org/>

<http://www.tn.gov/workforce/section/jobs-and-education>

### **LWDA 5**

<http://www.sedev.org/www>

<http://www.secareercenter.org/>

### **LWDA 6**

<http://www.workforcesolutionstn.org>

<http://www.tn.gov/workforce/section/jobs-and-education>

### **LWDA 7** <http://www.uchra.com/>

<http://www.tn.gov/workforce/section/jobs-and-education>

### **LWDA 8**

<http://www.workforceessentials.com/>

<http://www.tn.gov/workforce/section/jobs-and-education>

### **LWDA 9**

<http://www.NCACWorkforce.org>

<http://www.tn.gov/workforce/section/jobs-and-education>

### **LWDA 10**

<http://www.sctworkforce.org>

<http://www.tn.gov/workforce/section/jobs-and-education>

**LWDA 11**

<http://www.swhra.org>

**LWIA 12**

<http://www.dsc.edu>

<http://www.tn.gov/workforce/section/jobs-and-education>

**LWIA 13** <http://www.workforceinvestmentnetwork.com>

<http://www.tn.gov/workforce/section/jobs-and-education>

### State Web Sites

<http://www.tn.gov/workforce> This is the homepage of the Division of Workforce Services, Department of Labor and Workforce Development

[http://www.tn.gov/assets/entities/labor/attachments/TN\\_State\\_Integrated\\_Plan\\_2012.pdf](http://www.tn.gov/assets/entities/labor/attachments/TN_State_Integrated_Plan_2012.pdf) The Tennessee Department of Labor and Workforce Development Integrated State Plan (July 1, 2012 to June 30, 2017)

<http://www.tn.gov/workforce/article/incumbent-worker-training> View Frequently Asked Questions about the Incumbent Worker Program

<http://www.tn.gov> View the LWDA map

<http://www.tn.gov/workforce/article/technical-assistance-policies-wfs> View Policy and Policy Summaries from Workforce Development

<https://www.jobs4tn.gov/vosnet/MenuLandingPage.aspx?enc=Kt8ubp6xpBXFjGGwpUEHTJrE FXsfohStfgt3JXg+sRo=> View the List of Eligible Training Providers

<http://michie.com//tennessee/lpext.dll?f=templates&fn=fs-main.htm&2.0> Tennessee Code Annotated

### Federal Web Sites

<http://www.doleta.gov/> Employment and Training Administration, US Department of Labor

<http://www.doleta.gov/usworkforce/wia/act.cfm> View Public Law 113-128 of 2014, WIOA

<http://www.whitehouse.gov/omb/egov> View Plans for eGovernment Initiative

<http://wdr.doleta.gov/directives/> ETA Training and Employment Guidance Letters/Advisories

<http://www.gpoaccess.gov/nara/index/html> Search the Code of Federal Regulations

[https://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/2005/083105\\_a122.pdf](https://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/2005/083105_a122.pdf)

OMB, Circular A-122

[https://www.whitehouse.gov/sites/default/files/omb/assets/a133/a133\\_revised\\_2007.pdf](https://www.whitehouse.gov/sites/default/files/omb/assets/a133/a133_revised_2007.pdf) OMB,

Circular A-133

<http://www.hhs.gov/ocr/> LEP Guidance, ETA

<http://uscode.house.gov/search/criteria.shtml> Search the United States Code

[http://wdr.doleta.gov/opr/fulltext/FINALrep\\_02.pdf](http://wdr.doleta.gov/opr/fulltext/FINALrep_02.pdf) View the Urban Institute's

preliminary  
report on employment and training activities at faith-based institutions

<http://www.eeoc.gov/policy/ada.html> View Americans With Disabilities Act of

1990

<http://www.access-board.gov/508.htm> 36 CFR Part 1194, Electronic and  
Information Technology Accessibility Standards

<http://www.access-board.gov/telecomm/index.htm> 36 CFR Part  
1193, Telecommunications Act Accessibility Guidelines

<http://www.dol.gov/recovery/> This is the homepage for US DOL, Employment and Training  
Administration Recovery Act announcements and directives.

## **ATTACHMENTS**

**ATTACHMENT A**  
**SUBRECIPIENT CONTRACTS POPULATION**

Area	Administrative Entity & WIA Contact
<p align="center"><b>LWDA 1</b></p>	<p align="center">Kathy Pierce, Executive Director Alliance for Business and Training, Inc. P.O. Box 249 386, Highway 91 North Elizabethton, TN 37644 Office: 423-547-7515 ext. 126 FAX: 423-547-7522 Cell: 423-895-1105 Email: <a href="mailto:kpierce@ab-t.org">kpierce@ab-t.org</a> And <a href="mailto:glyons@ab-t.org">glyons@ab-t.org</a></p> <p align="center">Counties Served: Carter, Johnson, Sullivan, Unicoi, Washington</p>
<p align="center"><b>LWDA 2</b></p>	<p align="center">Dr. Nancy Benziger Brown, Ph.D. FAICP Dean of Workforce Development Walters State Community College 500 South Davy Crockett Parkway Morristown, TN 37813-9989 Office: 423-318-2709 FAX: 423-585-6769 Email: <a href="mailto:nancy.brown@ws.edu">nancy.brown@ws.edu</a> Or <a href="mailto:brownmb@aol.com">brownmb@aol.com</a></p> <p align="center">Counties Served: Claiborne, Cocke, Grainger, Greene, Hamblen, Hancock, Hawkins, Jefferson, Sevier, Union</p>
<p align="center"><b>LWDA 2</b></p>	<p align="center">Donna W. Stansberry, Director of WIOA Services 6057 W- Andrew Johnson Hwy., Suite 6A Talbott, TN 37877 Office: 423-317-1062 FAX: 423-317-1061 Email: <a href="mailto:Donna.Stansberry@ws.edu">Donna.Stansberry@ws.edu</a></p>

Area	Administrative Entity & WIA Contact
<p><b>LWDA 3</b></p>	<p>Barbara Kelly, Executive Director  Knoxville-Knox County CAC P.O.  Box 51650  2247 Western Avenue  Knoxville, TN 37950-1650  Office: 865-546-3500  FAX: 865-546-0832  Email: <a href="mailto:barbara.kelly@knoxcac.org">barbara.kelly@knoxcac.org</a></p> <p>Counties Served: Knox</p>
<p><b>LWDA 3</b></p>	<p>Winnie Wilson WIOA Director  Knoxville-Knox County CAC  P.O. Box 51650  2247 Western Avenue  Knoxville, TN 37950-1650  Office: 865-544-5200 ext. 1214  FAX: 865-544-5269  Email: <a href="mailto:vaughn.smith@knoxcac.org">vaughn.smith@knoxcac.org</a></p> <p>Counties Served: Knox</p>
<p><b>LWDA 4</b></p>	<p>Gary Holiway, Executive Director  East Tennessee Human Resource Agency  9111 Cross Park Drive  Suite D-100  Knoxville, TN 37923  Office: 865-691-2551 ext. 4202  Cell: 865-705-8469  FAX: 865-531-7216  Email: <a href="mailto:gholiway@ethra.org">gholiway@ethra.org</a></p> <p>Anderson, Blount, Campbell, Cumberland, Loudon,  Monroe, Morgan, Roane, Scott</p>

Area	Administrative Entity & WIA Contact
<p><b>LWDA 4</b></p>	<p>Chris Tiller, WIOA Director  728-E Emory Valley Road  Oak Ridge, TN 37830  865-813-0281/865-590-1052 ext. 7102  FAX: 865-813-0288  Cell: 865-705-8650  Email: <a href="mailto:ctiller@ethra.org">ctiller@ethra.org</a></p>
Area	Administrative Entity & WIA Contact
<p><b>LWDA 5</b></p>	<p>Beth Jones, Executive Director  Southeast Tennessee Development District  1000 Riverfront Parkway  Chattanooga, TN 37405-0757  Office: 423-266-5781  FAX: 423-267-7705  Email: <a href="mailto:bjones@sedev.org">bjones@sedev.org</a></p> <p>Bledsoe, Bradley, Hamilton, Marion, McMinn,  Meigs, Polk, Rhea, Sequatchie</p>
<p><b>LWDA 5</b></p>	<p>Rick Layne, WIOA Director Southeast Tennessee  Development District TN Career Center –  Chattanooga  Eastgate Towne Center  5600 Brainerd Rd. Suite A-5  Chattanooga, TN 37411  Office: 423-424-4212  FAX: 423-643-2396  Cell: 423-413-8742  Email: <a href="mailto:rlayne@sedev.org">rlayne@sedev.org</a>  another contact: Anna Smith <a href="mailto:AnnaS@sedev.org">AnnaS@sedev.org</a></p>

Area	Administrative Entity & WIA Contact
<p><b>LWDA 6</b></p>	<p>Gary Morgan, Executive Director  Workforce Solutions  410 Wilson Ave.  P.O. Box 1628  Tullahoma, TN 37388  Office: 931-455-9596  FAX: 931-455-9580  TDD: 931-454-0477  Email: <a href="mailto:gmorgan@workforcesolutionstn.org">gmorgan@workforcesolutionstn.org</a></p> <p>Counties Served: Bedford, Coffee, Franklin, Grundy,  Lincoln, Moore, Warren</p>
<p><b>LWDA 7</b></p>	<p>Luke Collins, Executive Director Upper  Cumberland Human Resource Agency  580 South Jefferson Suite B  Cookeville, TN 38501  Office: 931-528-1127  Direct Office Line: 931-520-9600  FAX: 931-526-8305  Cell: 931-397-2025  Email: <a href="mailto:lcollins@uchra.com">lcollins@uchra.com</a></p> <p>Cannon, Clay, DeKalb, Fentress, Jackson, Macon,  Overton, Pickett, Putnam, Smith, Van Buren, and White</p>

<p><b>LWDA 7</b></p>	<p>Ron Basham WIOA Director  Local Workforce Investment Area 7  Upper Cumberland Human Resource Agency  580 South Jefferson Avenue, Suite B  Cookeville, TN 38501  Phone: (931) 520-9610 (Direct Line)  Office: 931-528-1127  FAX: 931-526-8305  TTY: 1-800-848-0298  Email: <a href="mailto:rbasham@uchra.com">rbasham@uchra.com</a></p>
<p><b>Area</b></p>	<p><b>Administrative Entity &amp; WIA Contact</b></p>
<p><b>LWDA 8</b></p>	<p>Marla Rye, Executive Director  Workforce Essentials  523 Madison St. Suite A  Clarksville, TN 37040  Office: 931-551-9110  FAX: 931-551-9026  Email: <a href="mailto:mrye@workforceessentials.com">mrye@workforceessentials.com</a></p> <p>Counties Served: Cheatham, Dickson, Houston, Humphreys, Montgomery,  Robertson, Stewart, Sumner, Williamson</p>

<p><b>LWDA 9</b></p>	<p>Paul Haynes, Executive Director  The Nashville Career Advancement Center  621 Mainstream Drive, Suite 210  Nashville, TN 37228-1201  Office: 615-862-8890 ext. 77407  FAX: 615-862-8910  TDD: 1-800-848-0298  Email: <a href="mailto:paul.haynes@nashville.gov">paul.haynes@nashville.gov</a>  <a href="http://www-NCACWorkforce.org">www-NCACWorkforce.org</a></p> <p>Counties Served: Davidson, Rutherford,  Trousdale, Wilson</p>
<p><b>LWDA 10</b></p>	<p>Jan O. McKeel, Executive Director  South Central Tennessee Workforce Alliance  #8 Public Square, 2nd Floor  Columbia, TN 38401  Office: 931-375-4201  FAX: 931-381-7643  Email: <a href="mailto:Jan.McKeel@sctworkforce.org">Jan.McKeel@sctworkforce.org</a></p> <p>Counties Served: Giles, Hickman, Lawrence,  Lewis, Marshall, Maury, Perry, Wayne</p>

Area	Administrative Entity & WIA Contact
<b>LWDA 11</b>	<p data-bbox="678 268 1105 569"> Mike Smith, Executive Director  Southwest Human Resource Agency  P. O. Box 264  1527 White Avenue  Henderson, TN 38340-0264  Office: 731-989-5111  Cell: 731-608-1539  FAX: 731-989-3095  Email: <a href="mailto:msmith@swhra.org">msmith@swhra.org</a> </p> <p data-bbox="566 611 1214 674"> Counties Served: Chester, Decatur, Hardeman, Hardin,  Haywood, Henderson, Madison, McNairy </p>
<b>LWDA 12</b>	<p data-bbox="683 772 1101 1066"> Margaret Prater, Executive Director  Northwest TN Workforce Board  313 West Cedar Street  Dyersburg, TN 38024  Office: 731-286-3585 ext. 16  Fax: 731-286-3584  TDD: 731-286-3584  Email: <a href="mailto:prater@nwtworks.org">prater@nwtworks.org</a>  <a href="http://www-dscc.edu">www-dscc.edu</a> </p> <p data-bbox="548 1108 1235 1171"> Counties Served: Benton, Carroll, Crockett, Dyer, Gibson,  Henry, Lake, Lauderdale, Obion, Tipton, Weakley </p>
<b>LWDA 13</b>	<p data-bbox="557 1245 1227 1539"> Kevin D. Woods Executive Director Memphis  Work force Investment Network  480 Beale Street  Memphis, TN 38103  Office: 901-576-6812  FAX: 901-576-6844  Cell: 901-341-3083  P-cell: 901-497-9404  Email: <a href="mailto:Kevin.woods@workforceinvestmentnetwork.com">Kevin.woods@workforceinvestmentnetwork.com</a> </p> <p data-bbox="695 1581 1089 1612"> Counties Served: Fayette, Shelby </p>

<b>Area</b>	<b>Administrative Entity &amp; WIA Contact</b>
<b>LWDA 13</b>	<p data-bbox="615 432 1170 730"> Melanie Winfield, Deputy Director, Operations  Memphis Work force Investment Network  LWDA 13  480 Beale Street  Memphis, TN 38103  Office: 901-576-6813  FAX: 901-576-6844  Cell: 901-341-3083  P-cell : 901-497-9404 </p> <p data-bbox="534 774 1252 837"> Email : <a href="mailto:melanie.winfield@workforceinvestmentnetwork.com">melanie.winfield@workforceinvestmentnetwork.com</a>  <a href="http://www.workforceinvestmentnetwork.com">www.workforceinvestmentnetwork.com</a> </p>

**Tennessee Department of Labor & Workforce Development**

220 French Landing Drive

Nashville, TN 37243-0658

Contact: Dustin Swayne

Title: Deputy Commissioner

Phone: 615-532-5945

Fax: 615-3003

Workforce Help Line: 1-80-255-5872

Email: [Sterling.VanDerSpuy@tn.gov](mailto:Sterling.VanDerSpuy@tn.gov)

Website: <http://www.tn.gov/workforce>

**Tennessee AFL-CIO**

Technical Assistance Program

1901 Lindell Avenue

Nashville, TN 37203

(615) 383-6899

**Adult Education**

220 French Landing Drive, 4<sup>th</sup> Floor

Nashville, TN 37243-0658

(615) 741-7058

**ATTACHMENT B**

Subrecipient	Contract Number Assigned	Contract Begin Date	Contract End Date	Close Out Date	Contract Budget
AREA 01-AFBAT	LW01F132DWRSP13	09/15/14	06/30/15	08/14/15	158,878.00
	LW01F141ABSWA14	07/01/14	12/31/14	02/14/15	80,885.00
	LW01F141ADULT14	10/01/13	06/30/15	08/14/15	765,487.00
	LW01F141DSLWK14	10/01/13	06/30/15	08/14/15	591,575.00
	LW01F151ADULT15	10/01/14	06/30/16	08/14/16	773,126.00
	LW01F151DSLWK15	10/01/14	06/30/16	08/14/16	646,060.00
	LW01P131NCSWA14	11/13/14	10/31/15	12/15/15	22,125.00
	LW01P131YOUTH14	04/01/13	06/30/15	08/14/15	775,509.00
	LW01P141ADULT15	07/01/14	06/30/16	08/14/16	58,897.00
	LW01P141DSLWK15	07/01/14	06/30/16	08/14/16	106,715.00
	LW01P141IWRSP15	01/01/15	12/31/15	02/14/16	75,000.00
	LW01P141YOUTH15	04/01/14	06/30/16	08/14/16	822,322.00
	LW01P141YUSWA15	04/15/15	09/30/15	11/14/15	26,800.00
	LW01P151YOUTH16	04/01/15	06/30/17	08/14/17	883,176.00
	LW49F111ADDEI11	10/01/11	03/31/15	05/15/15	412,479.00
	LW49F141IWRSP14	01/03/14	12/31/14	02/14/15	146,898.00
	LW49P121NCNTV13	03/17/14	06/30/15	08/14/15	15,673.00
				<b>Total</b>	<b>6,345,932.00</b>

Subrecipient

AREA 02-WSCC	LW02F133DWRSP13	09/15/14	06/30/15	08/14/15	150,000.00
	LW02F141ABSWA14	07/01/14	12/31/14	02/14/15	85,858.00
	LW02F141ADULT14	10/01/13	06/30/15	08/14/15	1,159,554.00
	LW02F141DSLWK14	10/01/13	06/30/15	08/14/15	761,295.00
	LW02F151ADULT15	10/01/14	06/30/16	08/14/16	1,173,359.00
	LW02F151DSLWK15	10/01/14	06/30/16	08/14/16	943,454.00
	LW02F151IWRSP15	01/01/15	12/31/15	02/14/16	57,000.00
	LW02P131ADULT14	07/01/13	06/30/15	08/14/15	30,726.00
	LW02P131DSLWK14	07/01/13	06/30/15	08/14/15	80,890.00
	LW02P131YOUTH14	04/01/13	06/30/15	08/14/15	1,118,049.00
	LW02P141ADULT15	07/01/14	06/30/16	08/14/16	89,388.00
	LW02P141DSLWK15	07/01/14	06/30/16	08/14/16	155,839.00
	LW02P141YUSWA15	04/15/15	09/30/15	11/14/15	40,600.00
	LW02P151YOUTH16	04/01/15	06/30/17	08/14/17	1,212,244.00
	LW41F141IWRSP14	01/03/14	12/31/14	02/14/15	50,000.00
	LW41P121NCNTV13	03/17/14	06/30/15	08/14/15	15,673.00
				<b>Total</b>	<b>8,330,384.00</b>

**Subrecipient**

AREA 03-KCCAC	LW03F141ABSWA14	07/01/14	12/31/14	02/14/15	26,250.00
	LW03F141ADULT14	10/01/13	06/30/15	08/14/15	684,472.00
	LW03F141DSLWK14	10/01/13	06/30/15	08/14/15	819,371.00
	LW03F151ADULT15	10/01/14	06/30/16	08/14/16	705,191.00
	LW03F151DSLWK15	10/01/14	06/30/16	08/14/16	711,011.00
	LW03F151IWRSP15	01/01/15	12/31/15	02/14/16	25,000.00
	LW03P111ADDEI12	10/01/14	03/31/15	05/15/15	105,246.00
	LW03P122NCNTV13	02/02/15	06/30/15	08/14/15	11,400.00
	LW03P131ADULT14	07/01/13	06/30/15	08/14/15	18,137.00
	LW03P131DSLWK14	07/01/13	06/30/15	08/14/15	87,061.00
	LW03P131NCSWA14	11/13/14	10/31/15	12/15/15	9,000.00
	LW03P133YOUTH14	04/01/13	06/30/15	08/14/15	834,560.00
	LW03P141ADULT15	07/01/14	06/30/16	08/14/16	53,722.00
	LW03P141DSLWK15	07/01/14	06/30/16	08/14/16	117,445.00
	LW03P141YOUTH15	04/01/14	06/30/16	08/14/16	915,136.00
	LW03P141YUSWA15	04/15/15	09/30/15	11/14/15	31,000.00
	LW03P151YOUTH16	04/01/15	06/30/17	08/14/17	947,773.00
	LW42F111ADDEI11	10/01/11	09/30/14	11/14/14	480,000.00
	LW42P121NCNTV13	03/17/14	06/30/15	08/14/15	15,673.00
				<b>Total</b>	<b>6,597,448.00</b>

Subrecipient

AREA 04-ETHRA	LW04F141ABSWA14	07/01/14	12/31/14	02/14/15	70,959.00
	LW04F141ADULT14	10/01/13	06/30/15	08/14/15	1,056,539.00
	LW04F141DSLWK14	10/01/13	06/30/15	08/14/15	1,351,053.00
	LW04F151ADULT15	10/01/14	06/30/16	08/14/16	1,088,704.00
	LW04F151DSLWK15	10/01/14	06/30/16	08/14/16	935,008.00
	LW04F151IWRSP15	01/01/15	12/31/15	02/14/16	75,000.00
	LW04P131ADULT14	07/01/13	06/30/15	08/14/15	27,996.00
	LW04P131DSLWK14	07/01/13	06/30/15	08/14/15	143,553.00
	LW04P131NCSWA14	11/13/14	10/31/15	12/15/15	22,125.00
	LW04P131YOUTH14	04/01/13	06/30/15	08/14/15	961,927.88
	LW04P141ADULT15	07/01/14	06/30/16	08/14/16	82,938.00
	LW04P141DSLWK15	07/01/14	06/30/16	08/14/16	154,444.00
	LW04P141YOUTH15	04/01/14	06/30/16	08/14/16	1,092,429.00
	LW04P141YUSWA15	04/15/15	09/30/15	11/14/15	28,600.00
	LW04P151YOUTH16	04/01/15	06/30/17	08/14/17	1,148,203.00
	LW39F133IWRSP13	01/03/14	12/31/14	02/14/15	83,498.00
	LW39P121NCNTV13	03/17/14	06/30/15	08/14/15	15,673.00
				<b>Total</b>	<b>8,338,649.88</b>

Subrecipient

AREA 05-SETDD	LW05F141ABSWA14	07/01/14	12/31/14	02/14/15	105,000.00
	LW05F141ADULT14	10/01/13	06/30/15	08/14/15	1,268,330.00
	LW05F141DSLWK14	10/01/13	06/30/15	08/14/15	1,666,640.00
	LW05F151ADULT15	10/01/14	06/30/16	08/14/16	1,292,842.00
	LW05F151DSLWK15	10/01/14	06/30/16	08/14/16	1,203,147.00
	LW05F151IWRSP15	01/01/15	12/31/15	02/14/16	75,000.00
	LW05P131ADULT14	07/01/13	06/30/15	08/14/15	33,608.00
	LW05P131DSLWK14	07/01/13	06/30/15	08/14/15	177,086.00
	LW05P131NCSWA14	11/13/14	10/31/15	12/15/15	22,125.00
	LW05P131YOUTH14	04/01/13	06/30/15	08/14/15	1,342,444.00
	LW05P141ADULT15	07/01/14	06/30/16	08/14/16	98,489.00
	LW05P141DSLWK15	07/01/14	06/30/16	08/14/16	198,735.00
	LW05P141YOUTH15	04/01/14	06/30/16	08/14/16	1,436,176.00
	LW05P151YOUTH16	04/01/15	06/30/17	08/14/17	1,518,705.00
	LW52P121NCNTV13	03/17/14	06/30/15	08/14/15	15,673.00
	LW52P131IWRSP14	01/03/14	12/31/14	02/14/15	48,850.00
				<b>Total</b>	<b>10,502,850.00</b>

**Subrecipient**

AREA 06-WKFC SOL	LW06F133DWRSP13	09/15/14	06/30/15	08/14/15	250,000.00
	LW06F141ABSWA14	07/01/14	06/30/15	08/14/15	26,250.00
	LW06F141ADULT14	10/01/13	06/30/15	08/14/15	516,084.00
	LW06F141DSLWK14	10/01/13	06/30/15	08/14/15	364,603.00
	LW06F151ADULT15	10/01/14	06/30/16	08/14/16	496,578.00
	LW06F151DSLWK15	10/01/14	06/30/16	08/14/16	408,716.00
	LW06F151IWRSP15	01/01/15	12/31/15	02/14/16	55,000.00
	LW06P131DSLWK14	07/01/13	06/30/15	08/14/15	38,740.00
	LW06P131NCSWA14	11/13/14	10/31/15	12/15/15	22,125.00
	LW06P131YOUTH14	04/01/13	06/30/15	08/14/15	509,070.00
	LW06P141ADULT15	07/01/14	06/30/16	08/14/16	37,831.00
	LW06P141DSLWK15	07/01/14	06/30/16	08/14/16	67,511.00
	LW06P141YOUTH15	04/01/14	06/30/16	08/14/16	512,699.00
	LW06P141YUSWA15	04/15/15	09/30/15	11/14/15	35,900.00
	LW06P151YOUTH16	04/01/15	06/30/17	08/14/17	516,410.00
	LW43F132IWRSP13	01/03/14	12/31/14	02/14/15	25,000.00
	LW43P121NCNTV13	03/17/14	06/30/15	08/14/15	15,673.00
				<b>Total</b>	<b>3,898,190.00</b>

Subrecipient

AREA 07-UCHRA	LW07F133DWRSP13	09/15/14	06/30/15	08/14/15	125,000.00
	LW07F141ABSWA14	07/01/14	12/31/14	02/14/15	71,186.00
	LW07F141ADULT14	10/01/13	06/30/15	08/14/15	583,233.00
	LW07F141DSLWK14	10/01/13	06/30/15	08/14/15	421,172.00
	LW07F151ADULT15	10/01/14	06/30/16	08/14/16	593,433.00
	LW07F151DSLWK15	10/01/14	06/30/16	08/14/16	480,794.00
	LW07F151IWRSP15	01/01/15	12/31/15	02/14/16	25,000.00
	LW07P131NCSWA14	11/13/14	10/31/15	12/15/15	22,125.00
	LW07P131YOUTH14	04/01/13	06/30/15	08/14/15	579,889.00
	LW07P141ADULT15	07/01/14	06/30/16	08/14/16	45,208.00
	LW07P141DSLWK15	07/01/14	06/30/16	08/14/16	79,417.00
	LW07P141YOUTH15	04/01/14	06/30/16	08/14/16	619,817.00
	LW07P141YUSWA15	04/15/15	09/30/15	11/14/15	24,900.00
	LW07P151YOUTH16	04/01/15	06/30/17	08/14/17	629,302.00
	LW40P121NCNTV13	03/17/14	06/30/15	08/14/15	15,673.00
				<b>Total</b>	<b>4,316,149.00</b>

Subrecipient

AREA 08-WKFC ESS	LW08F133DWRSP13	09/15/14	06/30/15	08/14/15	234,000.00
	LW08F141ABSWA14	07/01/14	04/30/15	06/14/15	77,962.00
	LW08F141ADULT14	10/01/13	06/30/15	08/14/15	1,149,376.00
	LW08F141DSLWK14	10/01/13	06/30/15	08/14/15	1,008,459.00
	LW08F151ADULT15	10/01/14	06/30/16	08/14/16	1,098,126.00
	LW08F151DSLWK15	10/01/14	06/30/16	08/14/16	1,087,432.00
	LW08F151IWRSP15	01/01/15	12/31/15	02/14/16	75,000.00
	LW08P121AENCNTV	10/01/13	06/30/15	08/14/15	43,123.81
	LW08P122NCNTV13	03/01/15	06/30/15	08/14/15	17,603.00
	LW08P131ADULT14	07/01/13	06/30/15	08/14/15	30,456.00
	LW08P131DSLWK14	07/01/13	06/30/15	08/14/15	107,152.00
	LW08P131NCSWA14	11/13/14	10/31/15	12/15/15	127,125.00
	LW08P131YOUTH14	04/01/13	06/30/15	08/14/15	1,187,987.00
	LW08P141ADULT15	07/01/14	06/30/16	08/14/16	83,656.00
	LW08P141DSLWK15	07/01/14	06/30/16	08/14/16	179,621.00
	LW08P141YOUTH15	04/01/14	06/30/16	08/14/16	1,190,335.00
	LW08P141YUSWA15	04/15/15	09/30/15	11/14/15	51,100.00
	LW08P151YOUTH16	04/01/15	06/30/17	08/14/17	1,209,084.00
	LW48F111ADDEI11	10/01/11	03/31/15	05/15/15	553,438.00
	LW48F141IWRSP14	01/03/14	12/31/14	02/14/15	126,634.00
	LW48F141JCSWA14	05/01/14	06/30/16	08/14/16	100,000.00
	LW48P121NCNTV13	03/17/14	06/30/15	08/14/15	68,173.00
				<b>Total</b>	<b>9,805,842.81</b>

Subrecipient					
AREA 09-NCAC	LW09F133DWRSP13	09/15/14	06/30/15	08/14/15	700,000.00
	LW09F141ABSWA14	07/01/14	12/31/14	02/14/15	75,180.00
	LW09F141ADULT14	10/01/13	06/30/15	08/14/15	1,845,287.00
	LW09F141DSLWK14	10/01/13	06/30/15	08/14/15	2,161,685.00
	LW09F141IWRSP14	01/03/14	12/31/14	02/14/15	63,000.00
	LW09F151ADULT15	10/01/14	06/30/16	08/14/16	1,723,916.00
	LW09F151DSLWK15	10/01/14	06/30/16	08/14/16	1,742,818.00
	LW09F151IWRSP15	01/01/15	12/31/15	02/14/16	75,000.00
	LW09P121NCNTV13	03/17/14	06/30/15	08/14/15	68,173.00
	LW09P131ADULT14	07/01/13	06/30/15	08/14/15	48,896.00
	LW09P131DSLWK14	07/01/13	06/30/15	08/14/15	229,686.00
	LW09P131NCSWA14	11/13/14	10/31/15	12/15/15	22,125.00
	LW09P131YOUTH14	04/01/13	06/30/15	08/14/15	2,054,161.00
	LW09P141ADULT15	07/01/14	06/30/16	08/14/16	131,330.00
	LW09P141DSLWK15	07/01/14	06/30/16	08/14/16	287,877.00
	LW09P141YOUTH15	04/01/14	06/30/16	08/14/16	2,022,571.00
	LW09P141YUSWA15	04/15/15	09/30/15	11/14/15	61,500.00
	LW09P151YOUTH16	04/01/15	06/30/17	08/14/17	2,028,122.00
				<b>Total</b>	<b>15,341,327.00</b>

Subrecipient					
AREA 10-SCTWA	LW10F133DWRSP13	09/15/14	06/30/15	08/14/15	609,500.00
	LW10F141ABSWA14	07/01/14	12/31/14	02/14/15	67,966.00
	LW10F141ADULT14	10/01/13	06/30/15	08/14/15	611,535.00
	LW10F141DSLWK14	10/01/13	06/30/15	08/14/15	504,567.00
	LW10F151ADULT15	10/01/14	06/30/16	08/14/16	599,433.00
	LW10F151DSLWK15	10/01/14	06/30/16	08/14/16	479,418.00
	LW10F151IWRSP15	01/01/15	12/31/15	02/14/16	75,000.00
	LW10P121AENCNTV	10/01/13	06/30/15	08/14/15	43,123.81
	LW10P131ADULT14	07/01/13	06/30/15	08/14/15	16,205.00
	LW10P131DSLWK14	07/01/13	06/30/15	08/14/15	53,612.00
	LW10P131NCSWA14	11/13/14	10/31/15	12/15/15	22,125.00
	LW10P131YOUTH14	04/01/13	06/30/15	08/14/15	634,771.00
	LW10P141ADULT15	07/01/14	06/30/16	08/14/16	45,666.00
	LW10P141DSLWK15	07/01/14	06/30/16	08/14/16	79,190.00
	LW10P141YOUTH15	04/01/14	06/30/16	08/14/16	652,920.00
	LW10P141YUSWA15	04/15/15	09/30/15	11/14/15	38,900.00
	LW10P151YOUTH16	04/01/15	06/30/17	08/14/17	658,079.00
	LW53P111ADDEI12	10/01/11	03/31/15	05/15/15	668,700.00
	LW53P121IWRSP13	01/03/14	12/31/14	02/14/15	26,661.00
	LW53P121NCNTV13	03/17/14	06/30/15	08/14/15	15,673.00
				<b>Total</b>	<b>5,903,044.81</b>

Subrecipient

AREA 11-SWHRA	LW11F141ABSWA14	07/01/14	12/31/14	02/14/15	14,700.00
	LW11F141ADULT14	10/01/13	06/30/15	08/14/15	655,030.00
	LW11F141DSLWK14	10/01/13	06/30/15	08/14/15	466,408.00
	LW11F151ADULT15	10/01/14	06/30/16	08/14/16	674,169.00
	LW11F151DSLWK15	10/01/14	06/30/16	08/14/16	601,129.00
	LW11F151IWRSP15	01/01/15	12/31/15	02/14/16	50,000.00
	LW11P121NCNTV13	01/01/15	06/30/15	08/14/15	50,000.00
	LW11P131DSLWK14	07/01/13	06/30/15	08/14/15	49,557.00
	LW11P131YOUTH14	04/01/13	06/30/15	08/14/15	657,325.00
	LW11P141ADULT15	07/01/14	06/30/16	08/14/16	51,360.00
	LW11P141DSLWK15	07/01/14	06/30/16	08/14/16	99,294.00
	LW11P141YOUTH15	04/01/14	06/30/16	08/14/16	653,359.32
	LW11P141YUSWA15	04/15/15	09/30/15	11/14/15	28,900.00
	LW11P151YOUTH16	04/01/15	06/30/17	08/14/17	715,734.32
	LW45P121NCNTV13	03/17/14	06/30/15	08/14/15	15,673.00
				<b>Total</b>	<b>4,782,638.64</b>

**Subrecipient**

AREA 12-DSCC	LW12F133DWRSP13	09/15/14	06/30/15	08/14/15	710,000.00
	LW12F141ABSWA14	07/01/14	01/08/15	02/22/15	46,672.50
	LW12F141ADULT14	10/01/13	06/30/15	08/14/15	987,903.00
	LW12F141DSLWK14	10/01/13	06/30/15	08/14/15	1,302,746.00
	LW12F151ADULT15	10/01/14	06/30/16	08/14/16	1,033,046.00
	LW12F151DSLWK15	10/01/14	06/30/16	08/14/16	898,815.00
	LW12F151IWRSP15	01/01/15	12/31/15	02/14/16	75,000.00
	LW12P131YOUTH14	04/01/13	06/30/15	08/14/15	1,005,470.00
	LW12P141ADULT15	07/01/14	06/30/16	08/14/16	78,698.00
	LW12P141DSLWK15	07/01/14	06/30/16	08/14/16	148,465.00
	LW12P141YOUTH15	04/01/14	06/30/16	08/14/16	1,105,122.00
	LW12P141YUSWA15	04/15/15	09/30/15	11/14/15	29,800.00
	LW12P151YOUTH16	04/01/15	06/30/17	08/14/17	1,152,812.00
	LW50F141IWRSP14	01/03/14	12/31/14	02/14/15	97,549.00
	LW50P121FTRSP13	01/01/14	06/30/15	08/14/15	123,536.00
	LW50P121NCNTV13	03/17/14	06/30/15	08/14/15	15,673.00
	LW50P122JCRSP13	01/01/14	03/31/15	05/15/15	92,288.00
	LW50P123JCRSP13	04/15/14	06/30/15	08/14/15	60,000.00
				<b>Total</b>	<b>8,963,595.50</b>

<b>Subrecipient</b>					
<b>AREA 13-COFM</b>	LW13F133IWRSP13	01/03/14	12/31/14	02/14/15	60,550.00
	LW13F141ADULT14	10/01/13	06/30/15	08/14/15	2,325,325.00
	LW13F141DSLWK14	10/01/13	06/30/15	08/14/15	1,681,945.00
	LW13F151ADULT15	10/01/14	06/30/16	08/14/16	2,387,466.00
	LW13F151DSLWK15	10/01/14	06/30/16	08/14/16	2,605,995.00
	LW13F151IWRSP15	01/01/15	12/31/15	02/14/16	75,000.00
	LW13P111ADDEI12	10/01/11	03/31/15	05/15/15	486,062.00
	LW13P121NCNTV13	03/17/14	06/30/15	08/14/15	6,923.00
	LW13P122NCNTV13	04/13/15	06/30/15	08/14/15	13,360.00
	LW13P131ADULT14	07/01/13	06/30/15	08/14/15	61,616.00
	LW13P131DSLWK14	07/01/13	06/30/15	08/14/15	178,711.00
	LW13P131NCWA14	11/13/14	10/31/15	12/15/15	9,000.00
	LW13P131YOUTH14	04/01/13	06/30/15	08/14/15	2,586,254.00
	LW13P141ADULT15	07/01/14	06/30/16	08/14/16	181,879.00
	LW13P141DSLWK15	07/01/14	06/30/16	08/14/16	430,456.00
	LW13P141YOUTH15	04/01/14	06/30/16	08/14/16	2,783,767.00
	LW13P141YUSWA15	04/15/15	09/30/15	11/14/15	68,500.00
	LW13P151YOUTH16	04/01/15	06/30/17	08/14/17	3,076,001.00
				<b>Total</b>	<b>19,018,810.00</b>
<b>Subrecipient</b>					
<b>AREA 17-AFLCIO</b>	LW17F141DWRSP14	07/01/14	06/30/15	08/14/15	100,000.00
<b>AREA 18-UOFM</b>	LW18P111ADDEI12	10/01/11	09/30/14	11/14/14	145,399.00
<b>Adult Education</b>	LWT1P121AENCNTV	01/21/15	06/30/15	08/14/15	43,123.00
<b>Adult Education</b>	LWO1P121AENCNTV	10/01/13	06/30/15	08/14/15	43,123.81
				<b>Total</b>	<b>38,369,265.81</b>
				<b>Grand Total</b>	<b>112,492,180.45</b>

**ATTACHMENT C**

Summary Of WIA Risk Assessments

Risk Levels (See Outcomes on Last Page:  
 10 or Less - Very Low  
 20 to 40 - Low  
 40 to 60 - Medium  
 60 to 80 - High  
 Over 80 - Very High

Workforce Investment Act of 1998, Risk Assessment of LWIAs														
Name of Organization: Tennessee Department of Labor and Workforce Development report date 9/30/2015														
Exhibit 7 LOCAL WORKFORCE INVESTMENT AREAS														
	1	2	3	4	5	6	7	8	9	10	11	12	13	
Risk Categories	VALUES													
<b>1. FEDERAL FUNDS EXPENDED DURING A FISCAL YEAR:</b>														
< \$25,000	1													
> \$25,000 AND < \$100,000	2													
> \$100,000 AND <\$200,000	3													
> \$200,000 AND <\$300,000	4													
> \$300,000	5	5	5	5	5	5	5	5	5	5	5	5	5	
<b>2. PERCENT EXPENDED OF FEDERAL GRANTS:</b>														
< 80%	1													
<60%	2	2	2	2	2	2	2	2	2	2	2	2	2	
< 50%	3													
< 30%	4													
< 10%	5													
<b>3. MONITORING JUDGEMENT RISK:</b>														
Little concern, review on request or monitor's discretion **	1													
Low concern, review every 5 years	2													
Moderate concern, review every 3-4 years	3													
Fairly high concern, review every 2 years	4													
High audit concern, review annually	5	5	5	5	5	5	5	5	5	5	5	5	5	
<b>4. INTERNAL CONTROL:</b>														
Average	1			1							1		1	
Minor weaknesses	2	2	2		2	2	2	2	2	2				
Some significant weaknesses	3											3	3	
Many significant weaknesses or no audit	4													
<b>SUB-TOTAL</b>		14	14	13	14	14	14	14	14	14	13	15	13	15

Summary Of WIA Risk Assessments

Risk Levels (See Outcomes on Last Page:  
 35 or Less - Very Low  
 36 to 40 - Low  
 40 to 45 - Medium  
 45 to 55 - High  
 Over 55 - Very High

Name of Organization: Tennessee Department of Labor and Workforce Development														
LOCAL WORKFORCE INVESTMENT AREAS														
	1	2	3	4	5	6	7	8	9	10	11	12	13	
Risk Categories	VALUES													
5. RESULTS OF PRIOR MONITORING AND OTHER SITE VISITS:														
No significant findings	1							1		1	1		1	
Some minor findings	2	2		2	2		2		2					
Moderate findings or no prior audit	3		3			3						3	3	
Some significant findings	4													
Many significant findings	5													
6. NUMBER OF PROGRAMS FOR PERIOD BEING MONITORED:														
Single	1													
2-4	2													
5-	3													
6-7	4	4	4	4	4	4	4	4	4	4	4	4	4	
8 and over	5													
7. FINANCIAL/BUDGET IMPACT:														
Very little or no impact	1													
Little impact	2	2	2	2	2	2	2	2	2	2	2	2	2	
Moderate impact	3													
High impact	4													
Very high impact	5													
8. SIZE OF STAFF FOR PERIOD BEING MONITORED:														
Very Small (1-4)	1													
Small (5-8)	2													
Moderate (9-10)	3			3	3	3	3					3	3	
Large (11-15)	4	4						4	4	4	4	4	4	
Very large (15 and over)	5													
9. MANAGEMENT INPUT/CONCERN:														
Very little	1													
Some	2	2					2	2	2	2			2	
Moderate	3			3	3	3								
Much	4											4	4	
High	5													
SUB-TOTAL		14	15	14	14	15	13	13	14	13	13	16	13	16

Summary of Risk Assessments

Risk Levels (See Outcomes on Last Page):  
 30 or Less - Very Low  
 31 to 40 - Low  
 41 to 45 - Medium  
 46 to 55 - High  
 Over 56 - Very High

Name of Organization: Tennessee Department of Labor and Workforce Development														
LOCAL WORKFORCE INVESTMENT AREAS														
Risk Categories	VALUES	1	2	3	4	5	6	7	8	9	10	11	12	13
The TDLWD has received a waiver for this category for PY 13-14														
10. RESULTS OF COLLATERAL CONTACTS, CUSTOMER SURVEYS, ETC.:														
Zero or small indication of risk	1							1	1	1	1		1	
Some indication of risk	2	2				2	2							
Moderate indication of risk	3		3	3	3									
Large indication of risk	4											4		4
Very large indication of risk	5													
11. BOARD OF DIRECTORS INVOLVEMENT:														
Very active board (provides appropriate oversight)	1													
Active board (takes interest in financial matters review reports)	2	2	2	2	2	2	2	2	2	2	2	2	2	2
Moderately effective	3													
Not very effective (Not sufficiently independent of management)	4													
Inactive board (does not meet regularly)	5													
12. EXPERIENCE WITH STATE/GOVERNMENT CONTRACTS:														
Over 10 years experience	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Five to ten years experience	2													
Two to five years experience	3													
Less than two years experience	4													
Completely new	5													
13. CHANGES IN EQUIPMENT SYSTEMS & STAFF SINCE LAST REVIEW:														
No changes	1	1	1	1	1	1	1		1	1	1	1	1	
Moderate changes—low turnover	2							2						2
Equipment changes—low turnover	3													
High turnover	4													
High turnover & equipment systems change	5													
14. EXPOSURE TO LOSS:														
None	1													
Physical assets	2													
Readily negotiable	3													
Cash	4													
Confidential data	5	5	5	5	5	5	5	5	5	5	5	5	5	5
SUB-TOTAL		11	12	12	12	11	11	11	10	10	10	13	10	14
GRAND TOTAL RISK SCORE		39	41	39	40	40	38	38	36	37	36	44	36	45

Summary of WIA Risk Assessments

Risk Levels (See Outcomes on Last Page)  
 20 or Less - Very Low  
 20 to 40 - Low  
 40 to 60 - Medium  
 60 to 80 - High  
 Over 80 - Very High

* SEC 184 (a) 4 Monitoring : Each Governor of the state shall conduct on an Annual basis on site monitoring of each Local Area within the state of local government													
Summary of Risk Assessment	1	2	3	4	5	6	7	8	9	10	11	12	13
LOCAL WORKFORCE INVESTMENT AREAS	Very Low	Very Low	Very Low	Very Low	Moderate	Low	Medium						
Notes: Assumptions/Rationale:													
1. Federal Funds Expended during a fiscal year													
All LWIAs will bear the maximum risk for the federal funds expended (>\$300,000)													
2. Percent Expended of Federal Grants													
All LWIAs will expend greater than 50% grants													
3. Monitoring judgement risk													
Under SEC 184 (a) 4 Monitoring: Each Governor of the state shall conduct on an Annual basis on site monitoring of each Local Area within the state or local government.													
This monitoring judgement risk is weighted uniformly across all LWIAs; with emphasis on the note above.													
4. Internal Control													
Uniform Average Control weight applied because of controls in practice.													
5. Results of prior monitoring and other site visits													
Self explanatory													
6. Number of Programs for period being monitored													
This indicates the range number of the main programs being monitored													
7. Financial Budget Impact													
The Financial Budget Impact falls into very Little (or no impact) and Little impact categories; with "fall back" local government funds as secondary to WIA funds													
8. Size of Staff for period being monitored													
The underlying assumption is that Small to Moderate staff will suffice under normal circumstances.													
9. Management Input/Concern													
Self explanatory													
10. Results of collateral contacts, customer surveys, etc													
Zero or small indication of risk to some indication of risk													
11. Board of Directors Involvement													
Self explanatory													
12. Experience with State/Government Contracts													
All LWIAs weighted uniformly													
13. Changes in Equipment Systems & Staff since last review													
Moderate changes - low turnover													
14. Exposure to loss													
Participant confidential data custodianship and management bears maximum risk													

Summary Of WIA Risk Assessments

Risk Levels (See Outcomes on Last Page):  
 10 or Less - Very Low  
 20 to 40 - Low  
 40 to 60 - Medium  
 60 to 80 - High  
 Over 80 - Very High

SEC 184 (a) 4 Monitoring : Each Governor of the state shall conduct on an Annual basis on site monitoring of each Local Area within the state of local government													
Summary of Risk Assessment													
LOCAL WORKFORCE INVESTMENT AREAS	1	2	3	4	5	6	7	8	9	10	11	12	13
	Very Low	Very Low	Very Low	Very Low	Moderate	Low	Medium						
Notes: Assumptions/Rationale:													
1. Federal Funds Expended during a fiscal year													
All LWIAs will bear the maximum risk for the federal funds expended (>\$300,000)													
2. Percent Expended of Federal Grants													
All LWIAs will expend greater than 50% grants													
3. Monitoring judgement risk													
Under SEC 184 (a) 4 Monitoring, Each Governor of the state shall conduct on an Annual basis on site monitoring of each Local Area within the state or local government.													
This monitoring judgement risk is weighted uniformly across all LWIAs; with emphasis on the note above.													
4. Internal Control													
Uniform Average Control weight applied because of controls in practice.													
5. Results of prior monitoring and other site visits													
Self explanatory													
6. Number of Programs for period being monitored													
This indicates the range number of the main programs being monitored													
7. Financial Budget Impact													
The Financial Budget Impact falls into very Little (or no impact) and Little impact categories; with "fall back" local government funds as secondary to WIA funds													
8. Size of Staff for period being monitored													
The underlying assumption is that Small to Moderate staff will suffice under normal circumstances.													
9. Management Input/Concern													
Self explanatory													
10. Results of collateral contacts, customer surveys, etc													
Zero or small indication of risk to some indication of risk													
11. Board of Directors involvement													
Self explanatory													
12. Experience with State/Government Contracts													
All LWIAs weighted uniformly													
13. Changes in Equipment Systems & Staff since last review													
Moderate changes - low turnover													
14. Exposure to loss													
Participant confidential data custodianship and management bears maximum risk.													

**ATTACHMENT D**

**Corrective Action Plan Tracking Log**

July 1 FY 14- September 30, 2015 Results of Monitoring Visits			INITIAL Determination Phase				
Sub-Recipient	Date Mon. Report Received	Bold (yellow fill)= unresolved	Corrective Action Due Date LWIAs	Date of Local C.A.P. Response	Department State Response Date	Further 2nd review Needed	Department Final Acceptance Letter Date
LWIA 1	8/21/2014	No Finding Reported	N/A	N/A	N/A	No	N/A
LWIA 2	2/26/2014	1. Expenditures were charged outside contract period. 2. Program funds were not used efficiently. 3. Case management needs improvement.	3/26/2014	3/14/2014	3/20/2014	No	6/2/2014
LWIA 2	3/17/2015	1. Expenses were charged to contract before contract begin date.	4/17/2015	4/7/2015	4/30/2015	No	N/A
LWIA 3	6/4/2014	No Findings Reported	N/A	N/A	N/A	No	N/A
LWIA 3	6/12/2015	No finding Reported	N/A	N/A	N/A	No	N/A
LWIA 4	7/2/2014	Expenditures were charged to the contract prior to the contract period LWIA 4 failed follow the State Comprehensive Travel Regulations Procedures over equipment need improvement	7/2/2014  N/A	8/2/2014  N/A	Pending  N/A	yes  No	2/5/2015  N/A
LWIA 5	1/28/2014	1. Youth case management needs improvement	2/27/2014	2/28/2014	3/11/2014	No	3/11/2014
LWIA 5	3/31/2015	1a. Procedure over reporting need improvement. 1b. Unliquidated amounts could not be reconciled to accounting records.	4/31/2015	5/29/2015	5/29/2015	No	N/A
LWIA 6	6/30/2014	1. LWIA failed to follow the State Travel Regulations. Two employees were overpaid. One by over \$5 and another by \$8.25. 2. Case Management needs improvement. 3 adult participants were coded as active but were not contacted for over a year.	6/11/2014	6/30/2014	8/25/2014	No	8/25/2014
LWIA 6	8/24/2015	1. Unallowable cost was charged to contract 2. LWDA 6 charged expenditures to a contract that were incurred prior to contract's effective date.					
LWIA 7	1/28/2014	1. Youth expenditures were over reported to TDUSD	2/28/2014	2/25/2014	3/11/2014	No	3/11/2014

\* lots of e-mails back and forth to complete the CAP.

LWIA 7	1/13/2013	1. Local Investment Area 7 failed to comply with the Comprehensive State Travel Regulations 2. There was no document to support a check payable to Regions Bank on September 26, 2014. Questioned Cost \$937.00	2/13/2015	2/6/2015	2/27/2015	No	2/27/2014	
LWIA 8	4/24/2014	1. Contract Management needs improvement. Questioned cost \$741.60 2. Expenditures over reported \$190.00	5/24/2014	5/13/2014	5/30/2014	Yes	5/30/2014	
LWIA 8	5/27/2013	1. LWDA 8 charged expenditures to contracts that were incurred prior to 2. The agency did not comply with the terms of the subcontract.	6/27/2015	6/9/2015	6/21/2015	Yes	6/21/2015	
LWIA 9	3/11/2014	No Findings Reported	N/A	N/A	N/A	No	N/A	
LWIA 11	9/3/2014	1. Expenditures charged to the contract were not within period availability. Questioned Cost \$24,775.89 2. Vendor refunds were not used to reduce program costs. Questioned cost \$2,477.83 3. Unallowable costs were charged to grants. Questioned cost \$1,775.26 4. Reporting Procedures need improvement. Questioned cost of \$1,092.76 5. In kind match for the SCSEP was over reported. 6. Procedure for allocating program costs need improvement.	10/3/2014	10/3/2014	2/13/2015	Yes	2/3/2015	*lots of e-mails to complete the CAP.
LWIA 11	5/11/2015	1. Unallowable costs were charged to contract 2. Procedure for allocating program costs needs improvement 3. Reporting Procedures need improvement. 4. Discrepancies were noted between participant time sheets and payroll needs.	6/11/2015	5/28/2015	6/25/2015	Yes	9/15/2015	*lots of e-mails to complete the CAP.
LWIA 12	11/14/2013	No finding	N/A	N/A	N/A	No	N/A	
LWIA 12	1/28/2015	No finding	N/A	N/A	N/A	No	N/A	
LWIA 13	9/22/2014	1. Reporting procedures need improvement. 2. Unallowable expenses were charged to grants. 3. LWIA 13 failed to comply with State Travel Regulations. 4. Discrepancies were noted in the participants payroll. 5. Procedures over property and equipment need improvement.	10/22/2014	10/20/2014	2/3/2015	yes	2/3/2015	*lots of e-mails to complete the CAP.

LWIA 13	8/13/2015	6. Case management needs improvement.  1. Unallowable costs were charged to contracts. 2. Procedures for allocating program costs need improvement. 3. LWIA 13 charged expenditures to a contract that were incurred prior to the contract effective date	9/13/2015	9/13/2015				on going
TN Community Service Agency	8/13/2015	1. Failed to comply with state of Tennessee Comprehensive Travel						
UOM	5/12/2014	No Findings Reported	N/A	N/A	N/A	No	N/A	
UOM	9/23/2015	No Findings Reported						
Southwest Dev. District	9/23/2015	No Findings Reported	N/A	N/A	N/A	No	N/A	
Hope works	7/17/2014	No Findings Reported	N/A	N/A	N/A	No	N/A	
TN. Community Service	8/13/2015	1. Failed to comply with State Travel Regulations	9/13/2015	9/9/2015	9/23/2015	No	N/A	

**ATTACHMENT E**

Contractor	Recipient Organization	Contract Number Assigned	Contract				
			Begin Date	Contract End Date	Contract Status	Contract MOD	Contract Budget
AREA 10-SCTWA	South Central TN Workforce Alliance	LW10F152DWRSP15	10/1/2015	9/30/2016	Active	MOD-0	400,000.00
AREA 10-SCTWA	South Central TN Workforce Alliance	LW10F151NCSWA15	10/1/2015	6/30/2016	Active	MOD-0	45,455.00
AREA 10-SCTWA	South Central TN Workforce Alliance	LW10F161ADULT16	10/1/2015	6/30/2017	Active	MOD-0	593,617.00
AREA 10-SCTWA	South Central TN Workforce Alliance	LW10F161DSLWK16	10/1/2015	6/30/2017	Active	MOD-0	425,537.00
AREA 11-SWHRA	Southwest Human Resource Agency	LW11F151NCSWA15	10/1/2015	6/30/2016	Active	MOD-0	45,550.00
AREA 11-SWHRA	Southwest Human Resource Agency	LW11F161ADULT16	10/1/2015	6/30/2017	Active	MOD-0	718,934.00
AREA 11-SWHRA	Southwest Human Resource Agency	LW11F161DSLWK16	10/1/2015	6/30/2017	Active	MOD-0	556,890.00
AREA 12-DSCC	Dyersburg State Community College	LW12F141DWRSP14	11/1/2015	6/30/2016	Active	MOD-0	144,800.00
AREA 12-DSCC	Dyersburg State Community College	LW12F151NCSWA15	10/1/2015	6/30/2016	Active	MOD-0	45,455.00
AREA 12-DSCC	Dyersburg State Community College	LW12F152APRSP15	10/1/2015	3/27/2016	Active	MOD-0	23,920.00
AREA 12-DSCC	Dyersburg State Community College	LW12F153APRSP15	11/22/2015	1/31/2017	Active	MOD-0	20,100.00
AREA 12-DSCC	Dyersburg State Community College	LW12F161ADULT16	10/1/2015	6/30/2017	Active	MOD-0	1,058,376.00
AREA 12-DSCC	Dyersburg State Community College	LW12F161DSLWK16	10/1/2015	6/30/2017	Active	MOD-0	797,799.00
AREA 13-COFM	City of Memphis (WIN)	LW13F161ADULT16	10/1/2015	6/30/2017	Active	MOD-0	2,598,461.00
AREA 13-COFM	City of Memphis (WIN)	LW13F161DSLWK16	10/1/2015	6/30/2017	Active	MOD-0	2,354,458.00
AREA 1-AFBAT	Alliance for Business and Training	LW01F151NCSWA15	10/1/2015	6/30/2016	Active	MOD-0	45,455.00
AREA 1-AFBAT	Alliance for Business and Training	LW01F161ADULT16	10/1/2015	6/30/2017	Active	MOD-0	814,671.00
AREA 1-AFBAT	Alliance for Business and Training	LW01F161DSLWK16	10/1/2015	6/30/2017	Active	MOD-0	621,114.00
AREA 2-WSCC	Walters State Community College	LW02F151NCSWA15	10/1/2015	6/30/2016	Active	MOD-0	45,455.00
AREA 2-WSCC	Walters State Community College	LW02F161ADULT16	10/1/2015	6/30/2017	Active	MOD-0	1,177,865.00
AREA 2-WSCC	Walters State Community College	LW02F161DSLWK16	10/1/2015	6/30/2017	Active	MOD-0	837,422.00
AREA 3-KCCAC	Workforce Connections	LW03F161ADULT16	10/1/2015	6/30/2017	Active	MOD-0	715,900.00
AREA 3-KCCAC	Workforce Connections	LW03F161DSLWK16	10/1/2015	6/30/2017	Active	MOD-0	662,485.00
AREA 4-ETHRA	East TN Human Resource Agency	LW04F151NCSWA15	10/1/2015	6/30/2016	Active	MOD-0	45,455.00
AREA 4-ETHRA	East TN Human Resource Agency	LW04F161ADULT16	10/1/2015	6/30/2017	Active	MOD-0	1,123,298.00
AREA 4-ETHRA	East TN Human Resource Agency	LW04F161DSLWK16	10/1/2015	6/30/2017	Active	MOD-0	850,742.00
AREA 5-SETDD	Southeast TN Developmental District	LW05F151NCSWA15	10/1/2015	6/30/2016	Active	MOD-0	45,455.00
AREA 5-SETDD	Southeast TN Developmental District	LW05F161ADULT16	10/1/2015	6/30/2017	Active	MOD-0	1,342,671.00
AREA 5-SETDD	Southeast TN Developmental District	LW05F161DSLWK16	10/1/2015	6/30/2017	Active	MOD-0	1,144,951.00
AREA 6-WKFC SOL	Workforce Solutions	LW06F151NCSWA15	10/1/2015	6/30/2016	Active	MOD-0	45,455.00
AREA 6-WKFC SOL	Workforce Solutions	LW06F161ADULT16	10/1/2015	6/30/2017	Active	MOD-0	492,425.00
AREA 6-WKFC SOL	Workforce Solutions	LW06F161DSLWK16	10/1/2015	6/30/2017	Active	MOD-0	362,781.00
AREA 7-UCHRA	Upper Cumberland HRA	LW07F151NCSWA15	10/1/2015	6/30/2016	Active	MOD-0	45,455.00
AREA 7-UCHRA	Upper Cumberland HRA	LW07F161ADULT16	10/1/2015	6/30/2017	Active	MOD-0	592,669.00
AREA 7-UCHRA	Upper Cumberland HRA	LW07F161DSLWK16	10/1/2015	6/30/2017	Active	MOD-0	442,936.00
AREA 8-WKFC ESS	Workforce Essentials, Inc	LW08F153APRSP15	11/12/2015	1/31/2017	Active	MOD-0	25,000.00
AREA 8-WKFC ESS	Workforce Essentials, Inc	LW08F151NCSWA15	10/1/2015	6/30/2016	Active	MOD-0	45,455.00
AREA 8-WKFC ESS	Workforce Essentials, Inc	LW08F161ADULT16	10/1/2015	6/30/2017	Active	MOD-0	1,095,981.00
AREA 8-WKFC ESS	Workforce Essentials, Inc	LW08F161DSLWK16	10/1/2015	6/30/2017	Active	MOD-0	1,041,481.00
AREA 9-NCAC	Nashville Career Advancement Center	LW09F151NCSWA15	10/1/2015	6/30/2016	Active	MOD-0	45,455.00
AREA 9-NCAC	Nashville Career Advancement Center	LW09F152APRSP15	11/22/2015	1/31/2017	Active	MOD-0	25,000.00
AREA 9-NCAC	Nashville Career Advancement Center	LW09F161ADULT16	10/1/2015	6/30/2017	Active	MOD-0	1,692,925.00
AREA 9-NCAC	Nashville Career Advancement Center	LW09F161DSLWK16	10/1/2015	6/30/2017	Active	MOD-0	1,709,370.00

## MILITARY SERVICES FORM

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

SERVED IN THE MILITARY (Section A)	
Date: _____	
Full Name: _____	SSN: _____
Branch of Service: _____ Discharge Type: _____	Dates of Service: _____ Rank/Rate: _____
Contact Information: ( _____ ) <div style="display: flex; justify-content: space-around; font-size: small;"> <span>Home Phone <input type="checkbox"/></span> <span>Cell Phone <input type="checkbox"/></span> </div>	
Email: _____	
<b>How can we help you today?</b> _____	
As a military member or the spouse of one, you may be eligible for additional services if you can attest to belonging to at least one of the criteria below and consider it a barrier to employment:	
<ol style="list-style-type: none"> <li>1. A special disabled or disabled veteran; Special disabled and disabled veterans are those who are:               <ul style="list-style-type: none"> <li>• entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) or who has a claim pending with the VA under laws administered by the Secretary of Veterans' Affairs; or, <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>• were discharged or released from active duty because of a service-connected disability; <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> </ul> </li> <li>2. Homeless, as defined in Section 103(a) of the Stewart B. McKinney Homeless Assistance Act; <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>3. A recently-separated service member, (Within 3 years of End of Active Service) who at any point in the previous 12 months has been unemployed for 27 or more weeks; <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>4. An offender, who is currently incarcerated or has been released from incarceration; <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>5. Are you in need of a high school diploma or equivalent certificate; <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>6. Low-income (as defined by the State. See attached chart) <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> </ol>	
SERVED IN THE MILITARY AND ARE BETWEEN THE AGES OF 18-24 (Section B)	
<ol style="list-style-type: none"> <li>1. Are you between the ages of 18 and 24? <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>2. Do you have limited civilian work history? <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>3. Are you unemployed? <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>4. Are you transitioning from active military service? <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> </ol>	
OTHER ELIGIBLE (Section C)	
<ol style="list-style-type: none"> <li>5. Do you have a letter from the VA stating you are an eligible spouse? <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>6. Does your spouse have a total disability from a service-connected disability? <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>7. Has your spouse been listed as forcibly detained or interned by a foreign government or power, missing in action, or captured in line of duty for a total or more than 90 days? <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>8. Are you the surviving spouse of a veteran who died of a service-connected disability as evaluated by the VA or while having a total permanent service-connected disability? <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>9. Are you a Transitioning Service Member with any of the criteria as defined in section A or B? <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>10. Are you a "Wounded Warrior" currently in a treatment Facility or a Caregiver of one? <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> </ol>	
MILITARY DOCUMENTS	
<ol style="list-style-type: none"> <li>11. Do you have a DD214 in your possession? <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>12. Do you have a VA disability rating letter in your possession? <span style="float: right; font-size: small;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> </ol>	
<u>(Dated 2/24/2015)</u>	

<b>ANNUAL Workforce Innovation and Opportunity Act Income Guidelines 2015</b>			
Family Size	Poverty Level	LLSIL* - Metro	LLSIL.-Non-Metro
1	\$11,770	\$8,982	\$8,961
2	\$15,930	\$14,717	\$14,681
3	\$20,090	\$20,199	\$20,149
4	\$24,250	\$24,937	\$24,873
5	\$28,410	\$29,432	\$29,353
6	\$32,570	\$34,422	\$34,327
7	\$36,730	\$39,412	\$39,301
8	\$40,890	\$44,402	\$44,275
9	\$45,050	\$49,392	\$49,249
10	\$49,210	\$54,382	\$54,223
11	\$53,370	\$59,372	\$59,197
12	\$57,530	\$64,362	\$64,171
	Add \$4,160 for each additional family member	Add \$4,990 for each additional family member	Add \$4,974 for each additional family member
<b>*Lower Living Standard Income Level</b>			
To use this chart, compare the poverty level for the family size against either the Metro or Non-Metro LLSIL, depending on the county of residence, using the higher of the two.			
<b>Note - Metro LLSIL levels can only be used for the following counties:</b>			
Anderson, Blount, Bradley, Cannon, Carter, Cheatham, Chester, Crockett, Davidson, Dickson, Fayette, Grainger, Hamblen, Hamilton, Hawkins, Hickman, Jefferson, Knox, Loudon, Macon, Madison, Marion, Montgomery, Morgan, Polk, Roane, Robertson, Rutherford, Sequatchie, Shelby, Smith, Sullivan, Sumner, Tipton, Trousdale, Unicoi, Union, Washington, Williamson, Wilson.			

Revised: July 2015

**(This page is not to be given to the Client)**

Staff If a Veteran answers Yes to any question in section "A" or Yes to question 1 # in section "B" they can see the DVOP if the Discharge type is other than Dishonorable  
If a Veteran's Spouse or Other eligible answers Yes to any question in section "C" they can be seen by the DVOP

### SCSEP Monitoring

Sub-recipient \_\_\_\_\_

Reviewer \_\_\_\_\_ Date of review: \_\_\_\_\_

Executive Director Signature: \_\_\_\_\_ Fiscal Director Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

#### Program Questionnaire SCSEP

Question	YES	NO	N/A	Parameters
1. Is the Sub-Grantee familiar with the Workforce Investment Area (WIA) requirements?				SCSEP is a required partner under Workforce Investment Area (WIA) and is part of the One-Stop Delivery System and required to follow all applicable rules under WIA and its regulations
2. Does a MOU exist between the sub-grantee and the WIA Local Board?				
3. Are applicable SCSEP core services at the comprehensive Career Center outlined in the MOU?				
4. Is there a referral process identified and described in the MOU?				<b>641.220 SCSEP</b> resources are to be used to provide SCSEP services to SCSEP eligible individuals. SCSEP is to refer ineligible individuals to the One-Stop Delivery System for services.
5. Did the sub-grantee choose to arrange a reciprocal arrangement in the MOU?				<b>641.230</b> In an MOU, reciprocal arrangements can be negotiated between SCSEP and the One-Stop Delivery System to accept each other's assessment to determine need for services in SCSEP and Adult Programs under Title IB of WIA

6.	Does the sub-grantee distribute Career Center handouts to customers				<b>641.210</b> SCSEP is required to make arrangements through the One-Stop Delivery System to provide eligible individuals with access to other activities carried out by WIA partners at the Career Center.
7.	Do the recruitment and selection procedures reflect the sub-grantee is seeking to enroll Minorities?				<b>641.515</b> Each grantee or sub-grantee must develop methods of recruitment and selection that assure that the maximum number of eligible individuals will have an opportunity to participate in the program.
8.	Do the recruitment and selection procedures reflect the sub-grantee is seeking to enroll Limited English speaking eligible individuals?				<b>641.515</b>
9.	Do the recruitment and selection procedures reflect the sub-grantee is seeking to enroll those with the greatest economic need?				<b>641.515</b>
10.	Are Host Agency agreement files being maintained in accordance with SCSEP program regulations?				
11.	Is there feasible evidence that the sub-grantee is adhering to the priorities and preferences when examining participant characteristics?				In accordance with <b>641.520</b> , sub-grantees should select qualified individuals.
12.	Does the project have a waiting list?				<b>641.520</b>
13.	Do participant files show accurate computation of family income, using the inclusion and exclusion listed in the SCSEP Regulations?				<b>641.530</b>
14.	Is there a policy/procedure for immediate or 30-day terminations due to incorrect determination of eligibility?				<b>641.530</b>
15.	Is there a written grievance policy for complaint resolution for employees, sub-recipients, and participants				<b>641.530</b>

16.	Is there documentation in the file that the applicant was referred to other services when found ineligible for SCSEP services?				<b>641.530</b>
17.	When a participant is terminated for cause, is there proper documentation in the file?				<b>641.530</b>
18.	Is there documentation in the file that SCSEP participants are offered a free annual physical examination referral?				<b>641.530</b>
19.	Is the Confidential Income Statement used for both application and recertification?				<b>641.530</b>
20.	Is eligibility documentation in the participant files?				<b>641.530</b>
21.	Is there an I-9 Employment Eligibility Form on file for each participant enrolled?				<b>641.520</b>
22.	Is orientation provided to new participants at the time of enrollment or prior to the first day at a host agency and compensated?				<b>641.535</b> When Individuals are selected for participation in SCSEP, the grantee or sub- grantee is responsible for providing the following.
23.	Is there an IEP in the file documenting a complete assessment and plan for the SCSEP participant?				<b>641.535</b>
24.	Is there documentation that the host agencies and supervisors have been provided orientation?				<b>641.535</b>
25.	Is there documentation that a Participant Handbook is provided to SCSEP participants?				<b>641.535</b>
26.	In the participant's file, is there a copy of the Participant Task Form dated and signed on or before the Participants first day at a host agency?				<b>641.535</b>
27.	Does the project assess each new participant to determine the most suitable SCSEP assignment for that individual?				<b>641.535</b>

28.	Is the assessment made in consultation with the participant and does it consider the individual's preference of occupational category, work history, skills, aptitudes, and potential for performing proposed community service duties?				<b>641.535</b>
29.	Does the assessment consider the potential for transition to unsubsidized employment?				<b>641.535</b>
30.	Does the project seek a community service employment assignment which permits the most effective use of each participant's skills and aptitudes?				<b>641.535</b>
31.	Does the project evaluate each participant to determine potential for transition to unsubsidized employment and the appropriateness of participant's current community service employment assignment?				<b>641.535 -615-590</b> Grantee's and Sub-Grantee's responsibility to the SCSEP Participant
32.	Does the project develop alternate assignments, whenever feasible, if it is determined that a different community service employment assignment will provide greater opportunity for the use of the participant's skills and aptitudes, providing work experience which will enhance the potential for unsubsidized employment?				<b>641.535 -615-590</b>
33.	Are the assessments and evaluations required by this section documented and part of the participants file?				<b>641.535 -615-590</b>
34.	Is the Individual Employment Plan (IEP) developed within 3 months of enrollment for each participant and include the assessment?				<b>641.535 -615-590</b>
35.	Does the project evaluate the progress of the participant at <b>least</b> once a year?				<b>641.535 -615-590</b>

36.	Are there specific goals and completion dates included in the IEP ?				<b>641.535 -615-590</b>
37.	Are progress review dates noted in the IEP?				<b>641.535 -615-590</b>
38.	Are there signed agreements between the participant and project in the file?				<b>641.535 -615-590</b>
39.	Is the original IEP maintained in the participant's file?				<b>641.535 -615-590</b>
40.	Are participants receiving daily supervision at training sites?				
41.	Are supervisors ensuring that no participant works more than the compensated number of hours per day?				
42.	Are participants compensated for extra hours?				
43.	Are supportive services being provided to assist participants in subsidized and, where appropriate, in unsubsidized employment?				<b>641.545</b> The grantee or sub-grantee may provide or arrange for support services to assist participants in participating in SCSEP such as paying transportation, healthcare/medical, job related i.e.: shoes, badges, uniforms, eyeglasses, tools, child care, adult care, temp shelter, and follow-up services cost.
44.	Are supportive services obtained at no cost or reduced cost to the program?				<b>641.545</b>
45.	Are grant funds used to subsidize participants transportation cost?				<b>641.545</b>
46.	Is transportation obtained at no cost or reduced cost to the program.				<b>641.545</b>
47.	Is training being provided in job seeking skills in preparation for unsubsidized placement?  Date the job seeking skills training was provided.				<b>641.540</b> The grantee or sub-grantee must arrange skill training that is realistic and consistent with the participant IEP and that the most effective use of skills and talents. This does not apply to training received as part of a community service assignment.

48.	Is the assessment process being used to determine individual participant training/education needs?				<b>641.540</b>
49.	Has training/education been made part of the participants IEP?				<b>641.540</b>
50.	Are host agency community service activities provided, and clearly spelled out in the participant job description and IDP and not confused with training?				<b>641.540</b>
51.	Are training records kept in accordance with TDLWD/SCSEP policy?				<b>641.540</b>
52.	Have all training/education costs expended during the current year been described in a detailed sub-grant work-plan/budget or been approved in writing by the state coordinator?				
53.	Are participant meetings held quarterly and are they documented?				
54.	Are there documented copies of agenda and sign-in sheets for quarterly participant meetings?				
55.	Can the sub-grantee produce documentation of training hours being tracked on each participant?				
56.	Can the sub-grantee produce documentation of 6 month follow-up on all participants that have obtained unsubsidized employment?				<b>641.555</b> For participants placed in unsubsidized employment, the grantee must make contact during the first 6 months to determine if support services are needed to remain in the job.
57.	Are customer satisfactions surveys on file for participants that have completed 30days of subsidized employment?				<b>641.555</b>
58.	Does it appear that the placement goal will be achieved by the end of the grant period?				<b>641.560</b> Grantees are encouraged to work with the most difficult to place and refer job ready individuals to the Career Center.

59.	If there is a deficiency in meeting the goal is there corrective action documentation on what steps will be taken to meet the goal				<b>641.560</b>
60.	Was the unsubsidized placement goal met last year?				<b>641.560</b>
61.	Are private and public sector employers contacted directly to identify and develop suitable job openings for SCSEP participants? Are these efforts being documented?				
62.	Are participants being referred to and attending Job Fairs/Job Clubs/WIA One Stop System been used to assist in meeting placement goal.				
63.	Is job search assistance being provided to participants?				
64.	Is follow-up being conducted with the participant within the first six months to determine if support services are needed to maintain employment?				
65.	Is follow-up being conducted with the participant to establish placement and delivery of customer service survey if applicable?				
66.	Do follow-ups conform to USDOL requirements?				
67.	Are initial physical examinations offered to each participant?				<b>641.565</b> Participants wages are based on the highest applicable minimum wage for time spent in orientation, training, and work in community services assignments.
68.	Are additional physical examinations offered at least once a year or before fifteen continuous months?				
69.	Are physical examinations obtained at no cost to the project whenever possible ?				
70.	Has the maximum duration of enrollment been established and approved in the grant agreement?				<b>641.570</b>

71.	Has a limit on the amount of time at each agency been established and approved in the grant?				<b>641.575</b> A Grantee may establish a limit on the amount of time its participants may spend at each agency. Such limits should be established in the grant agreement and reflected in the IEP.
72.	Does the sub-grantee have a termination policy on file?				<b>614.580</b>
73.	During orientation and throughout participation, are participants informed and reminded of the non-employment status of community service activities?				<b>641.590</b>
74.	Is the project over-enrolled?				
75.	Is the project monitoring spending levels during the grant year?				
76.	Is there a procedure in place that governs implementation of the provision against activities utilizing SCSEP funds?				<b>641.833 – 641.836</b>
77.	Is there documentation that SCSEP staff and participants are informed that they are prohibited from participating in political activities while on the job?				
78.	Are project funds used in any way to support union activity?				<b>641.839</b> No funds provided under the Act may be used in any way to assist, promote, or deter union organizing.
79.	Are any participants paying union dues?				.
80.	Is the project ensuring for it and host agencies conformance to nepotism requirements?				<b>674.841</b> No grantee or sub-grantee may hire, and no host agency may be a work site for a person who works in an administrative capacity, staff position, or community service position funded under Title V or this part if a member of that person’s immediate family is engaged in a decision-making capacity (whether compensated or not) for that project, subproject, grantee, sub-grantee or host agency.

81.	Does the project have written personnel policies and procedures to include grievance procedures?				<b>641.910</b> Each grant must establish, and describe in the grant agreement grievance procedures for resolving complaints, other than those which cannot be resolved within 60 days under the grantee's procedures, may be filed with the Chief, Davison of Older Worker Programs, E & T Administration, U.S. Department of Labor, 200 Constitution Ave., N.W. Washington, D.C. 20210
82.	Are grievance procedures followed?				
83.	Have any complaints been filed this grant year?				
84.	Are complaints documented and filed?				
85.	When a project decides to take adverse action against a participant, does the Project Director notify the state coordinator prior to taking any action?				
86.	Was adverse action initiated against any participants during the previous program year?				
87.	Have there been any reports or accusations of suspected discrimination brought to the attention of project staff?				
88.	Have all project staff been trained in ensure compliance with ADA?				
89.	Does the project ensure that nondiscrimination assurances are included in all contractual agreements?				
90.	Is there documentation reflecting that host agencies is aware of the Maintenance of Effort requirements?				<b>641.844</b> Maintenance of Effort
91.	Are participants' working assignments a substitute for non-Title V work that should be performed by the regular employees of the host agency?				
92.	Are there any MOE violations?				

93.	Are the expenditures charged to Title V reasonable (based on allocation formula)?				<b>641.884</b> SCSEP recipients must follow the grant closeout procedures at 29 CFR 97.50 or 29 CFR 95.71 as appropriate. TDLWD will issue closeout instructions to projects as necessary.
94.	Does the accounting system have cost codes to separate Title V from other programs?				
95.	Does the project have a system for allocating cost to the appropriate cost category?				
96.	Does the project have a system for monitoring planned vs. actual cost and for taking corrective action?				
97.	Has the project earned any program income?				
98.	Does the Project Office accounting system provide adequate cost data to the Project Director?				
99.	Did the project comply with all closeout procedures required by the Legal Agreement?				
100.	Has the project submitted accurate monthly and quarterly financial reports on a timely basis?				
101.	Do all financial reports include accruals ?				
102.	Does the sub-sponsor charge indirect cost to the grant?				
103.	Does the sub-sponsor use an approved indirect cost rate for charging indirect cost to the grant?				
104.	Does the rate agreement cover the period of performance for the current grant?				
105.	What is the rate?				Rate:
106.	Were there any administrative findings in the last audit report?				
107.	Has the project taken corrective action to resolve the findings?				
108.	Has a final Findings & Determination (F&D) been made?				

109.	Were any cost disallowed?				
111.	Is staffing in accordance with approved contract agreement and budget?				
112.	Are job descriptions available?				
113.	Does the project maintain on-site Organizational Charts?				
114.	Does the project maintain on-site Position Descriptions?				
115.	Does the project maintain on-site Time Sheets?				
116.	Are there posting of appropriate posters (political activity limitation, EEO, etc.) in the project office?				
117.	Is there documentation that the project is continuing to seek out new Host Agencies?				
118.	Has the project provided orientation and training to host agencies?				
119.	Is the project following plan of action as outlined in the Grant Narrative?				
120.	Has the staff implemented recommendations for any corrective action?				
121.	Are members of the staff familiar and knowledgeable of the Grant's plan of action?				
122.	Are the monthly and Quarterly, Financial and Programmatic, Reports submitted to the TDLWD accurately and in a timely manner?				
123.	Are there consecutive time sheets properly signed for each preceding pay period?				
124.	Is there evidence that a wage of at least the current Federal or State minimum wage, whichever is higher is being paid participants?				
125.	Are hours worked tracked cumulative?				
126.	If applicable, are annual and /or sick leave time accrued accurately and are records kept?				

127.	Are there two valid signatures (Participant and Supervisor) on each time sheet?				
128.	Does the participant file contain the Applicant/Participant Form jointly signed by the applicant/participant & interviewer?				
129.	Does the participant file contain the Community Service Form?				
130.	Does the participant file contain the Confidential Income Statement jointly signed by the applicant/participant & interviewer?				
131.	Does the participant files contain the Recertification				
132..	Does the participant file contain the Applicant's Confidential Statement at Recertification?				
132.	Does the participant file contain the Initial Assessment Form?				
133.	Does the participant file contain the Annual Assessment?				
134.	Does the participant file contain the Individual Employment Plan?				
135.	Does the participant file contain Goals, Support Services, and Training?				
136.	Does the participant file contain the IEP Follow up/Review?				
137.	Is the physical, reexamination, and/or waiver kept separately according to ADA requirements?				
137.	Is there an exit form present?				
138.	Does the participant file contain the proper documentation when there is Termination for cause?				
139.	Does the participant file contain Unsubsidized Placement Follow-up?				
140.	Was there a Participant Training Description at the Host Agency?				

141.	Has the project established written policies relating to compensation for scheduled work hours during which an applicant's or sub-recipient's business is closed for Federal Holidays?				
142.	Do you have the orientation documentation on the Host agency?				
143.	Do you have the orientation documentation on the Grievance Procedure?				
144.	Are there records of Supportive Services including Quarterly participant meetings, job seeking skills training, etc.				
145.	Are the Participant Performance Evaluations on file?				
146.	Are the Host Agency and Participant documents on file?				
147.	Is there a monitoring form on file?				
148.	Are Host Agency File Verifications included?				
149.	Does the Host Agency Agreement include the FEIN?				
150.	Do the files contain required copies of source documentation to prove Age, Income Sources, and Family Size?				
151.	Do the files contain a copy of the income tax form?				
152.	Does the project have adequate public liability and other appropriate forms of insurance as stated in the Grant Agreement?				
153.	Does the project have Workers' Compensation Insurance?				
154.	Does the project have Occupational Diseases Insurance?				

155.	Does the project have Employer Liability Insurance?				
156.	Does the project have General Liability Insurance?				
157.	Does the project have Automobile Liability Insurance?				
158.	Are there written travel procedures?				
159.	Do the travel expenses charged to the sub-grant meet the requirements of the Grant?				
161.	Does the project have a copy of the latest Equitable Distribution Plan?				
162.	Does the project have a copy of the latest State Plan?				
163.	Is the sub-grantee using the IEP in determining when it is appropriate to rotate participants through assignments, with the goal of achieving unsubsidized employment?				
164.	Is there a written policy setting forth actions to be taken to deal with those found to be ineligible, including notification of their right to appeal the finding ?				
165.	Is the project obtaining a written waiver from each participant who declines to have a physical?				
166.	Has the project established written policies relating to necessary sick leave that is not part of an accumulated sick leave program?				
167.	Is there an IEP Termination policy on file?				
168.	Has the IEP Termination policy been approved by DOL?				
169.	Are participant files being maintained for 3 years after the program year in which all follow-up activity for a participant has been completed?				
170.	Are participant records securely stored an access limited to appropriate staff to safeguard personal identifying information?				

171.	Are quarterly Narrative Reports being sent no later than the 10 <sup>th</sup> after each quarter to TDLWD?				
172.	Has the project provided the administrative office with an MOU specifying how services will SCSEP services are provided by SCSEP partners?				
173.	Are medical records and criminal background checks being kept separate from participant files?				
174.	Are quarterly Progress and Narrative Reports being sent no later than the 10 <sup>th</sup> after each quarter to TDLWD?				
175.	Has the project provided the administrative office with an MOU specifying how services will SCSEP services are provided by SCSEP partners?				
176.	Are medical records and criminal background checks being kept separate from participant files?				
177.	Are SCSEP participants being assessed for computer literacy training? Is it documented in the participant file?				
178.	If it has been determined that the participant lacks basic computer skills are they referred to computer literacy training. Is there documentation in the participant file?				
179.	Are participants that have been documented as Job Ready turning in the required Job Searches?				
180.	Are participants that have been documented as Job Ready referred to a TN Career Center for registration assistance with the JOBS4TN website?				