

The following information represents responses from Tennessee Department of Labor & Workforce Development (TDLWD) in response to public comments issued during a Public Comment period running July 31, 2026- August 15, 2026, concerning the State Workforce Development Board (SWDB) proposed Tennessee's Workforce System Governance Framework Policy

Public Comment #1 – Ashley Horan, Northern Middle Workforce Development Board

Comment Summary: Expresses concern that the proposed transition to regional governance structure may diminish local representation, accountability, and responsiveness.

TDLWD Response: The State acknowledges the concerns shown for local representation and accountability as the state transitions to a new integrated regional governance structure. However, the State emphasizes the purpose for this new structure is to align workforce decisions with regional labor markets, employer demand, training pipelines, and economic development strategies all while preserving local representation. While the proposed model changes where formal board functions are housed, the State stresses that local input will remain an integral component of Tennessee's workforce system. Under this regional model, local elected officials, local employers, partners, and community stakeholders will continue to work together to inform workforce decisions.

Similarly, Local Elected Officials will continue to maintain the same statutorily delegated authority delegated under the Workforce Innovation and Opportunity Act (WIOA). If the policy is approved, supplemental guidance will be issued alongside of this framework policy which provides more detailed information relating to local budgeting and funding decisions, as well as dedicated safeguards to ensure adequate rural representation.

The State also appreciates the concerns regarding the implementation timeline for this proposed transition. While implementation is expected to begin September 2026, this transition is not expected to be fully completed until July 2027. Supplemental transition guidance, technical assistance, and funding will also be issued to ensure local areas have ample time and resources to implement this new model. With respect to providing meaningful stakeholder engagement, the State believes that it has satisfied its obligation in this regard by placing this policy on its website for public comment in compliance with agency standards. In addition, the State has also actively engaged in multiple discussions with local stakeholders regarding this new structural change. The state will continue to welcome feedback and discussion from all interested stakeholders upon approval of this policy by the State Board.

Disposition: No change to the proposed framework policy and implementation timeline. Tennessee will continue to ensure that local input plays a meaningful role in shaping workforce decisions.

Public Comment #2– Jessica Morgan, Upper Cumberland Workforce Development Board

Comment Summary: Request to provide U.S. Department of Labor’s approval of Tennessee’s Waiver Requests, including the specific statutory and regulatory provisions waived in connection with USDOL’s authorization for Regional Workforce Development Boards to serve as alternative entities

TDLWD Response: USDOL ETA’s approval letter concerning Tennessee’s Waiver Requests can be found on USDOL’s website:

<https://www.dol.gov/sites/dolgov/files/ETA/wioa/docs/Signed%20TN%20Waiver%20Response.pdf>

The requested information relating to USDOL’s waiver to authorize “Regional Workforce Development Boards to serve as alternative entities under WIOA §107(i)” can be located in Waiver #8.

Public Comment #3 – Randy Porter, Putnam County Mayor, Upper Cumberland

Comment Summary: Expresses concern that the proposed transition to regional governance structure will diminish the contributions of smaller local areas to Tennessee’s workforce system. Also expresses doubts and concern about the proposed timeline for implementation.

Response: The State acknowledges the Mayor’s concerns relating to Tennessee’s proposed framework policy and provides assurance that the work of rural areas will not be undermined by this new transition. Rather, the shift to regional governance will serve to further strengthen their workforce impact through increased strategic capacity while preserving local voice and community representation. If the policy is approved, TDLWD will release operational guidance and implementation standards, including requirements for Regional Workforce Board Bylaws and Local Advisory Council Charters, that support the policy’s preservation of local voice.

Regarding timing of the proposed Workforce System Governance Framework Policy, the State emphasizes these proposed changes represent the culmination of a deliberate effort to modernize Tennessee’s workforce system in response to evolving federal expectations and the state’s growing workforce demands. Grounded in Executive Order 109 and the Board’s statutory and bylaw

authorities, the proposed framework is intended to move Tennessee's workforce system beyond compliance toward greater integration, strategic consistency, accountability, regional impact, and innovation. This modernization is particularly timely as Tennessee prepares to meet significant workforce demands associated with major investments in advanced manufacturing, nuclear energy, and other high-growth industries. By proposing this governance shift now, Tennessee hopes to lead the nation in creating a future-ready, industry-aligned regional workforce system that ensures every Tennessean has access to economic opportunity and every employer can access the skilled talent required to thrive in a competitive global economy.

If approved, TDLWD will issue supplemental guidance and transitional information alongside the framework policy that will help address operational questions. Regarding specific implementation questions included in the public comment, if the proposed policy is approved:

- As the WIOA alternate entity, Regional Workforce Boards will have the authority to select an Executive Director and maintain board staff as needed to support the region.
- County liability for respective grant funds will remain and will continue to be outlined through an Interlocal Agreement, per WIOA.
- American Job Centers will continue to be the primary delivery mechanism for the one-stop system. Regional Boards will have the authority to determine AJC locations and the regional one-stop system structure, in accordance with the strategic framework and standards provided by State Workforce Development Board and TDLWD.

Disposition: No change to the proposed framework policy and implementation timeline.

Public Comment #4— Jennifer Bane, Executive Director, Northwest & Southeast Local Workforce Development Boards

Comment Summary: Expresses concerns related to the proposed timeline for Tennessee's transition to a regional governance structure.

TDLWD Response: The State appreciates the concerns regarding the implementation timeline for this proposed transition. However, if the policy is approved, the transition will be phased, beginning September 2026, and be completed by July 1, 2027. The State believes this transition period will provide ample time and opportunity to ensure readiness. In addition, supplemental transition guidance, technical assistance, and funding will also be issued to ensure local areas have sufficient time and resources to successfully implement this new model.

Disposition: No change to the proposed framework policy and implementation timeline.

Public Comment #5– Ashley Clevenger, Executive Director, Southern Middle Local Workforce Development Board

Comment Summary: Expresses support regarding the Framework Policy's goals relating to strategic regional leadership, an employer-driven system, reduced administrative fragmentation, and improved accountability. Requests clarification regarding specific operational components of the proposed governance structure.

TDLWD Response: The State is appreciative of South-Central Tennessee Development District's (SCTDD) support as the State transitions to a regional governance model.

If approved, TDLWD will issue supplemental guidance and transitional information alongside the framework policy that will help address operational questions. Regarding specific implementation questions included in the public comment, if the proposed policy is approved:

- TDLWD will issue supplemental guidance and transitional information alongside the policy that will address operational questions, such as the criteria and process used to select the Lead Administrative Organization.
- The regional Fiscal Agent will be selected by the Regional Consortium of CLEOs, in the same manner which local Fiscal Agent selection is delegated to each LWDA's CLEO under WIOA. More detailed information will be issued and provided in corresponding supplemental guidance.

Disposition: No change to the proposed framework policy and implementation timeline. More detailed operational information relating to questions concerning LAO and Fiscal Agent selection, specific governance documents, and fiscal accountability will be addressed in post-approval supplemental guidance and implementation documents.