

Public Comments and Responses

The following information represents responses from Tennessee Department of Labor & Workforce Development (TDLWD) in regards to public comments issued during a Public Comment period running March 23, 2026 to April 23, 2026, for the 2026-2027 Tennessee WIOA Combined State Plan Modifications and USDOL Waiver Requests.

Public Comment #1 – Leslie Bright

Comment Summary: Concern that centralization and infrastructure reduction may harm rural residents, older adults, individuals with disabilities, and persons facing digital or literacy barriers, particularly in Appalachian communities.

TDLWD Response: Tennessee acknowledges the concern shown for certain vulnerable classes of individuals, such as rural residents, the elderly, individuals with disabilities, and those with digital or literacy barriers, and agrees that these populations must not face reduced access to services. However, the overarching goal of these waivers and intent behind the structural redesign of Tennessee's workforce model is to ultimately expand access to service channels and improve connections to assistance, not limit them.

As part of its waiver analysis, Tennessee has identified several areas where WIOA has inadvertently imposed significant barriers to effective service delivery. One such example that Tennessee has identified is WIOA's rigid requirements concerning the maintenance of physical comprehensive AJCs. As a result, Tennessee has requested to waive these requirements and instead be granted the flexibility to identify and determine locations where alternative and more cost-effective service delivery methods would better serve certain communities as opposed to fixed physical centers. And while this flexibility would have the benefit of reducing administrative and infrastructure costs, it would also result in the flexibility to redirect resources from facility maintenance to direct participant services, such as skills training, credential attainment, and career advancement in high-wage, in-demand industries.

Furthermore, Tennessee is taking steps to ensure that any potential reduction in infrastructure would not result in limiting service access to Tennessee's more vulnerable populations. As highlighted in its request, Tennessee would still provide access through physical centers, regional hubs, community-based points, mobile outreach, virtual appointments, and direct staff linkage. Tennessee would ensure that site technology, accessibility, and direct linkage standards are all met before any locations are designated as an access point. In addition, before any site conversion or closure, Tennessee will conduct an access and service continuity review considering rural access, ADA and Equal Opportunity compliance, customer navigation needs, and availability of assisted service to ensure that there is no loss of service quality during this transition.

Disposition: No change to the waiver request. Implementation guidance and monitoring will continue to emphasize access safeguards, service continuity, and protections for high-barrier populations.

Public Comments #2 and #3 – Ashley Clevenger, South Central Tennessee Development District

Comment Summary: Request for clarification concerning whether WIOA Title I formula funds will continue to flow through the local fiscal agent or move through the hub structure, and which entity will carry Uniform Guidance responsibilities at the regional level.

TDLWD Response: Tennessee appreciates the request for clarification. However, Tennessee cannot provide a direct response to the question as written because it has not yet made a determination as to whether any of the prospective waivers will be implemented.

Tennessee can provide a limited response for how it anticipates formula funds to flow if Waiver Request 8 is approved and subsequently implemented.

If Tennessee's Waiver Request 8 is approved and subsequently implemented, the TDLWD will remain the statewide grantee and oversight authority for all WIOA Title I funds. In addition, Tennessee will have the flexibility to designate Regional Planning Councils (RPCs) to serve as alternative entities responsible for carrying out the statutory functions currently assigned to Local Workforce Development Boards. If

Tennessee subsequently decides to implement this model, the Regional Planning Council would serve as the funding recipient for regional and shared hub-and-spoke functions, managing procurement, financial administration, reporting, monitoring, audit support, record retention, and Uniform Guidance compliance for regionalized funds and contracts. Local funds or services not regionalized would stay under the current local fiscal structure unless changed through approved policy. Final cost allocation, fund flow, monitoring, and contract structures will be detailed in formal fiscal guidance, implementation materials, and applicable MOU or IFA documents to ensure a predictable compliance structure.

Disposition: No change to the waiver request. Final subaward and contract structures will be addressed in post-approval fiscal guidance and implementation documents.

Public Comment #4 – Jessica Belitz, Blount Partnership, and Blount County Mayor Ed Mitchell

Comment Summary: Supports modernization, but urges the State to preserve local governance, transparency, competitive integrity, rural and suburban access, participant-informed choice, and predictable funding structures.

Response: Tennessee appreciates the support for modernization and the recommendation to preserve community representation, transparency, and access. Tennessee agrees the workforce system is strongest when state, regional, and local partners collaborate. The waiver for Regional Planning Councils aims to modernize governance based on regional labor markets and employer demand while maintaining stakeholder representation and accountability. Tennessee recognizes the need for written procedures, conflict-of-interest safeguards, documented selection criteria, and ongoing state monitoring for operator or provider selection under waiver authority. Tennessee also agrees that rural and suburban communities should not face reduced service or unreasonable travel. The redesigned model uses hubs, comprehensive centers, affiliate or specialized access points, mobile outreach, direct linkage standards, accessibility requirements, and certification review to maintain statewide access. For training and funding flexibility, Tennessee will balance employer coordination with participant-informed career planning, clear fiscal guidance, and impartial opportunities for providers and

partners. Statewide policy, implementation guidance, and monitoring will continue to implement these principles as waivers are implemented.

Disposition: No change to the waiver request. The comment will inform implementation guidance concerning local consultation, operator selection procedures, access protections, and fiscal clarity.