State of Tennessee LWDA Assessment

Sprint 4 – Southern Middle

March 25, 2019–April 15, 2019

Building a better working world

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Executive summary

Summary of observations

Outlined below are the key and consistent themes arising from our interviews with stakeholders and review of documentation:

- Perceived or real conflicts of interest exist within the Southern Middle Tennessee LWDA.
- There is an opportunity to enhance the involvement of LWDA leadership in strategic planning and increase accountability by developing a road map detailing key initiatives to achieve strategic outcomes.
- Roles and responsibilities of key stakeholders within the workforce system are unclear.
- There are opportunities to enhance role performance by providing targeted training and educating key stakeholders on communication protocols relative to the firewall.
- The Board's visibility into the effectiveness of the local workforce system is limited due to undefined performance management expectations and rudimentary dashboards and reports.
- Opportunities to improve or strengthen internal controls within the SMTLWDA exist within the following areas:
  - RFP selection process
  - RFP scoring criteria
  - Communication of policies and procedures
  - Service provider contract management and monitoring
- Similar to other LWDAs, the Southern Middle Tennessee LWDA faces technology limitations that lead to process inefficiencies.

Assessment approach

Our framework

EY assessed the organizational fitness and operational controls of the Southern Middle LWDA by using a holistic framework that focused on strategic elements of an organization.

Assessment methodology

1 Gather and review information

- Collect documentation and review to gain preliminary understanding of the LWDA as a whole and the organization's operating model

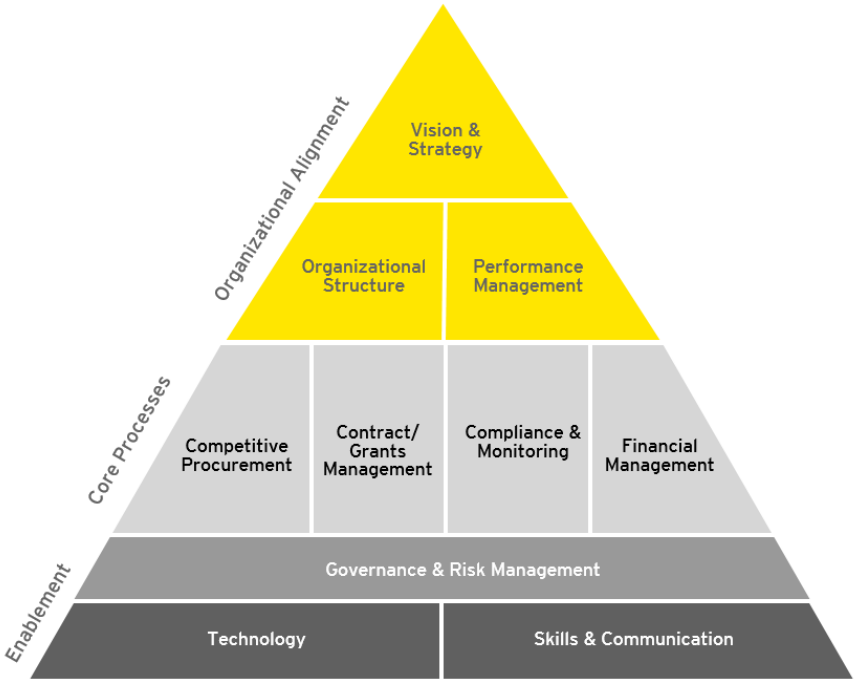
2 Conduct interviews focusing on the strategic elements of an organization

- Validate key roles and responsibilities
- Review internal control activities
- Develop RACI charts to define roles and responsibilities
- Review technology landscape, KPIs, organizational structure, skills and communication lines

3 Document findings and recommendations of improvement

- Consolidate interview information
- Summarize observations
- Identify leading practices
- Develop and document improvement recommendations

Strategic elements of an organization



Organizational alignment

Governance

Potential conflicts of interests

Perceived or real conflicts of interest exist within the Southern Middle LWDA.

Key observation

- The administrative entity (SCTDD) was appointed by then-CLEO Richard Stewart without a competitive bid. When Mayor Stewart did not seek re-election, he was hired by SCTDD as a senior advisor to the Executive Director. This presents a conflict of interest and an appearance of bias in the selection process.
- All parties involved in the RFP process (including Selection Committee members and facilitators) to procure a one-stop operator (OSO) signed a conflict of interest and confidentiality of records statement; however, potential conflicts of interest were noted among certain RFP Selection Committee members:
  - T.R. Williams, the CLEO of Southern Middle LWDA, currently sits on the Governing Board for SCHRA, who was awarded the OSO/CSP Contract.
  - Keith Durham, the Southern Middle LWDA Board Chair, was previously on the Governing Board for SCHRA, when he served as Lawrenceburg City mayor.
- The first Board meetings of the new local area Board were held at the entity that eventually won the RFP award (SCHRA), which creates the appearance of a potential conflict of interest.
- Wallace Cartwright, T.R Williams and Bill Newman sit on both the SCTDD and the SCHRA Board. Cross-pollination between the two Boards impairs independence in fact and/or appearance.

Recommendations

- The State Department of Workforce Development should determine if conflicts of interest affected the awarding of WIOA-related contracts and/or the competitive bid process.
- Consider performing a review of the relevant conflict of interest policies to determine if a conflict of interest or perceived conflict of interest exists and whether clarification of the policies needs to be made.
- Conflict of interest statements should be reviewed to confirm accuracy of statements.
- To avoid conflicts of interest, SMTLWDB should consider the use of an independent third party with experience in performing RFP reviews and coordinating the RFP process, similar to other LWDAs in the state. This independent party may reduce the opportunity for local preferences to influence the evaluation of service provider capabilities.

Organizational alignment

Vision and strategy

SMTLWDA strategy

There is an opportunity to enhance the involvement of LWDA leadership in strategic planning and increase accountability by developing a road map detailing key initiatives to achieve strategic outcomes.

Focus area	Key observation
Strategic vision	The SMTLWDA Local Plan has a defined vision, goals and strategies for services expansion. It includes the WIOA-negotiated common performance targets to measure program success and OSO and AJC partner reports to measure effectiveness in expanding access to services. The Local Plan outlines key responsibilities of the OSO to enable functional supervision and strategic alignment of partners and of the Business Services Team to conduct outreach to employers and gather input. Providing access to services is a key strategic focus area in the area's Strategic Plan. The WIOA Program Director demonstrated strong knowledge of the LWDA vision and objectives. She was actively involved in the creation and formalization of the Local Plan. The WIOA Program Director and the Regional Director collaborated to finalize the draft Local Plan that was shared with the LWDA Board, Business Services Team and CLEO for review. The Chair to the Local Board and the CLEO understand the SMTLWDA strategic focus areas; however, their involvement with the development of the Plan was limited due to the short turnaround timeframe to develop the Plan and the infancy state of the new LDWA. There is an opportunity to enhance their involvement in setting and driving the strategic direction of the LWDA.
Road map to achieve strategic outcomes	The Board Staff (South Central Tennessee Development District) utilizes a tracker to track action items status and progress post-realignment. While this tool is useful and effective, it does not articulate the connection with Local Plan strategic outcomes. Developing a roadmap tied to strategic outcomes will serve as a guide to key stakeholders, keep them aligned, committed and engaged, and increase accountability.
Strategy enabling technology	In the Local Plan, technology is primarily used to collect participant information, enroll participants, review performance, case management and to share information across programs through VOS. There is an opportunity to develop and formalize technology initiatives that further market and increase access of AJC services to the public.

Recommendations

- Develop a roadmap to achieve strategic outcomes. This will serve as a guide to key stakeholders regarding the future vision for the SMTLWDA. It should include detailed plans for future initiatives with key milestones and updated as needed with input from key stakeholders.
- Define technology initiatives that market and further expands access to AJC services to the public.

Organizational alignment

Organizational structure

Roles and responsibilities

Roles and responsibilities of key stakeholders are unclear.

Focus area	Key observation
Executive Director and Staff to the Board	There is a lack of clarity regarding who is ultimately responsible for WIOA. The WIOA Program Director performs similar duties to Executive directors in other local areas; however, multiple individuals including the Director of Economic Development, the Special Projects Coordinator, and the Executive Director of SCTDD claimed to be the lead of the WIOA Program in interviews. Some key stakeholders mentioned they view the Executive Director of the SCTDD as inherently the Executive Director to the Board; however, the role of Executive Director of the SCTDD is not well defined. The Executive Director of SCTDD defined his responsibilities as "to support the Board and the CLEO" with no further detail. Several roles within SCTDD have split responsibilities between WIOA and business services. In interviews, these individuals described their roles as focusing on economic development, yet 70% of their time was allocated to the WIOA program for billing purposes.
Regional Director	The Regional Director views her role as a facilitator, acting as the voice of the State in the Southern Middle LWDA. She sits on the local workforce Board and acts as a liaison between the partners. She expressed having a very strong working relationship with the WIOA Program Director and Compliance Board Staff, which was reciprocated during our interviews conducted with them (the WIOA Program Director referred to the Regional Director as a critical success factor).
Fiscal Agent	The Fiscal Agent (SCTDD) was appointed to serve in this role and not competitively procured. Based on interviews, SCTDD did not feel prepared to take on the role of Fiscal Agent. Interviewees mentioned that the responsibilities of this role were not communicated and appropriate training was not provided. Although a formal agreement exists between the CLEO and SCTDD, it does not appear that the roles and responsibilities of Fiscal Agent have been clearly defined and communicated by the CLEO.
CLEO	The CLEO, who has fiscal responsibility of WIOA funds, mentioned that due to the infancy of the new area, he is minimally involved in oversight activities such as reviewing any fiscal reports; however, activity will soon begin.

Recommendations

- Develop a reference guide to clearly define SCTDD Board Staff, CLEO and OSO responsibilities, performance reporting expectations, organizational structure, management accountability and authority within the SMTLWDA.
- Develop a communication and education plan to help build awareness and mitigate any open questions around Board Staff role responsibilities within SMTLWDA.
- SCTDD should consider implementing a timesheet review by the fiscal agent to confirm time is allocated in accordance with activities.

Organizational alignment

Performance management

Performance management

The Board's visibility into the effectiveness of the local workforce system is limited due to undefined performance management expectations and rudimentary dashboards and reports.

Focus area	Key observation
Local Board performance	While interviewees expressed satisfaction with their newly developed Board, we noted a lack of performance measurement conducted by the Board. We identified a tendency to rely on the negotiated performance measures (monitored at the State Board level) and minimal emphasis on how the Board is measuring the success of its workforce system locally. The CLEO, Board Chair and others expressed that due to the "infancy" of the new Board, they have yet to determine exactly what performance management will look and act like within their Board.
OSO reporting	During quarterly meetings, the Board receives a performance dashboard that reports on the status of WIOA performance measures, partner referrals and co-enrollments, business services updates, etc. Since the SCHRA was awarded the contract for OSO and CSP, they have not been providing the Southern Middle LWDB with formal status reports or performance dashboard, which is not in line with the requirements of the contract. During the first two quarters, SCTDD's WIOA Program Director developed program reports on behalf of the OSO, potentially violating the firewall. During interviews, the OSO Manager mentioned that she will be taking over this responsibility going forward with assistance and training from SCTDD's WIOA Program Director.

Recommendations

- Performance of the local workforce system should be measured by qualitative and quantitative metrics. We recommend that the Board and CLEO develop and implement a structured process and approach for defining these metrics, as part of their development of the strategic local plan. Metrics should be measurable, sustainable, clearly linked to the LWDA strategy, understood and communicated.
- We recommend that dashboards and reports be presented in a way that clearly links metrics to strategic goals (which should be defined and articulated by the LWDB and CLEO) and drives actions and decision-making.
- We recommend that reports include historical data to identify meaningful trends.
- We recommend the OSO Manager begin preparing the program reports and delivering them to the Board as required by the contract.

Governance and risk management

Internal controls

Policies and procedures

Communication of policies and procedures could be improved.

Observation	Leading practice
▸ During re-alignment, the previous LWDA 10 and LWDA 6 were combined to form the new Southern Middle LWDA. The merging of two distinct legacy areas into one new area meant having two sets of policies and procedures with inconsistencies (and some contradictions) between them. The Board initially voted to grandfather in both sets of policies until new ones could be developed for Southern Middle. This led to some initial confusion in instances where the separate policies conflicted. ▸ New policies and procedures are communicated and discussed during partner meetings, but interviewees noted that time spent discussing these policies is limited, leading to confusion while implementing. ▸ SCTDD has a documented internal control manual based on the Standards for Internal Control in the Federal Government (Green Book), which is considered leading practices among other entities in our review. However, there are no controls or process documentation specific to managing WIOA activities.	▸ The organization has thoroughly documented key business policies and procedures, assisting with standardization across the organization, and allowing management to identify potential risks and inefficiencies. Documented policies and procedures also serve to mitigate risks associated with business continuity and succession planning. ▸ New policies and procedures are thoroughly communicated throughout the organization, including protocols for escalating questions and concerns. ▸ Internal control activities are thoroughly documented and specific to the programs managed by the entity.

Recommendations

- We recommend reviewing the area's policies and procedures to determine if the appropriate decisions and judgments were made during the tight timeframe. Time constraints and deadlines were a reoccurring theme throughout our interviews, which may have incidentally led to hastened decisions. Leveraging leading practices from other areas for developing and documenting key policies and procedures will make the process more effective and efficient.
- We recommend that policies and procedures are disseminated to all relevant staff members and sufficient time is spent communicating the policies, including relevant examples.
- We recommend that the Fiscal Agent define and document internal controls specific to managing WIOA program funds.

RFP Selection Committee

Board responsibilities were delegated to a selection committee without vote of the full Board.

Observation	Leading practice
▸ An Executive Committee of the Southern Middle LWDB was appointed by the former CLEO, Richard Stewart, and was delegated as the RFP Selection Committee. The RFP Selection Committee was given the responsibility for reviewing and scoring RFP responses and making a collective decision to select the winning entity and award the RFP. During our interviews and review of RFP documentation, we noted the following: ▸ Per review the Board meetings minutes, the CLEO gave the authority to the RFP Selection Committee to make the final decision. The full Board was not involved in the decision to award. ▸ The Executive Committee members were appointed by the CLEO during the same meeting that the Executive Committee was appointed as RFP Selection Committee. Given the timeframe, the process for forming the committee and confirming the competence of members is unclear. Requirements for committee members are not defined or documented.	▸ Staff involved in procurement have appropriate and regular training on procurement policies and procedures. ▸ The RFP Selection Committee should be made up of individuals with various area of knowledge (i.e., financial, procurement, career services). The RFP coordinator is responsible for forming a cross-functional team who is knowledgeable and impartial. ▸ Based on subject-matter knowledge or functional area, it may be appropriate for each Selection Committee member to be assigned only a specific section of the proposal to review and score. ▸ Smaller organizations may choose to outsource the RFP process if they determine that their time will be more impactful spent elsewhere. Outsourcing the RFP process can reduce workload and operational costs.

Recommendations

- We recommend that if a selection committee is used to review RFPs, that the final decision be brought before the full Board for an approval vote.
- We recommend that the LWDB develop and document leading practices for RFP selection committees. This should include:
  - Minimum requirements of knowledge represented within the evaluation committee and process for appointing and selecting members (requirements of knowledge may vary, depending on the service being procured).
  - If required knowledge is not available, consider outsourcing the RFP process.

RFP evaluation process

RFP scoring did not follow recognized leading practices.

Observation	Leading practice

▸ We noted the following instances where leading practices were not used in the RFP process:
  ▸ Blind scoring was not utilized.
  ▸ Scorers were not given sufficient training of criteria to be used in the scoring process or over scoring scales used.
  ▸ Leading practice weighting scoring practices were not utilized.
  ▸ Evaluators did not have to document the rationale behind their scores, as free text documentation fields were optional.
▸ Per review of the score sheets, results may have been biased.
  ▸ Three scorers seemed to have varying opinions in their scoring – Keith Durham (scoresheet heavily favored SCHRA, where he formally served on the governing board), TR Williams (scoresheet heavily favored SCHRA, where he currently serves on the governing board), Christine Hopkins (scoresheet heavily favored Motlow State Community College).
  ▸ During interviews with SCHRA, it was mentioned that career advisors had limited experience in providing youth services. However, SCHRA received scores of 22, 18, 19, 23 and 25 (out of 30) in that category despite the proposal including limited references to youth experience while the proposal from MCHRA (another entity who responded to the RFP) included specific references to their almost 20 years of youth experience and received scores of 18, 20, 21, 22 and 22 (out of 30).
	▸ Vendors are selected based on defined and documented evaluation criteria and competitive selection methods.
	▸ Scoring is blind (process by which evaluators rate the responses without specific knowledge of which entity is tied to which answer) reducing the risk of bias in the RFP process.
	▸ Use distinct weightings. This method allows each criterion to be measured on the same scale. Each also has a weight by which the score is multiplied to give it a total weighted score. This makes scoring easy and verifies that the most important criteria are given greater consideration.
	▸ Rationales behind evaluations are documented.
	▸ RFP evaluation criteria is clearly defined and documented, increasing consistency in scoring across judges and setting clear expectations for scorers.

Recommendations

- We recommend that the LWDA develop standardized policies and procedures for the RFP process. A policy for this process would provide structure for how to conduct the process, the key personnel to be involved, and should include leading practices to increase the likelihood that the process will run more effectively and efficiently going forward and avoid real or perceived conflicts of interest.
- When reviewing scores as part of the decision-making process, consider comparing choices side by side in a matrix (either using software or in Excel). This will allow scoring anomalies to stand out.

Contract management

There are gaps in the Southern Middle LWDB's overall approach to service provider contract management and monitoring.

Observation	Leading practice
▸ The contract for OSO and CSP services between SCHRA (the contracted OSO CSP) and SCTDD contains limited language in terms of service expectations. The contract includes a "Scope of Services and Deliverables" section, which includes generic wording that the grantee must establish career services as described under WIOA. The contract elaborates on what activities career services include, but lacks details in terms of their expectations in measurable terms or obligations for when expectations are not met. ▸ SCTDD has a full-time Board staff member dedicated to WIOA monitoring and compliance. She performs monitoring of the OSO and CSP's quality by reviewing a sample of customers (20%) from each: Adult, Youth, and Dislocated Worker. Results of monitoring and any issues are communicated to the CSP contact, who responds with a corrective action plan. Repeat issues or trends are escalated at the next partners meeting. This type of monitoring is a leading practice. ▸ During interviews, it was noted that there could be improvements to the onboarding process for the OSO and CSP to minimize inefficiencies during transitions. ▸ During our interview with the OSO, she mentioned case notes as an area of concern, stating that additional trainings were needed due to quality issues.	▸ Service-level agreements (SLAs) are in place for all outsourcing contracts. SLAs include specific, measurable key performance indicators that can be clearly monitored and reported against. The SLA should describe the mechanism for escalating and resolving issues related to the delivery of services. The contract owner should be the main author of the SLA as they set the expectations for service delivery and quality that they require. ▸ There is a formal process in place to monitor contract performance and compliance to drive quality delivery and identify areas where the providers is not performing to expectations. Service provider performance is reported and reviewed collaboratively with the service provider. ▸ Contract obligations and compliance are clearly visible through a dashboard. ▸ Customer satisfaction surveys are integrated (where appropriate) into the contract performance metrics.

Recommendations

- We recommend that service provider contracts include a balanced scorecard and contract management plan with a defined set of metrics for determining vendor performance. This should be unique form the negotiated performance metrics, which are owned at the state level.
- During the contracting process, we recommend that the Southern Middle LWDB define how the service provider performance will evaluated. This should include the metrics and evaluation criteria used to create a scorecard.
- We recommend that the Southern Middle LWDB define and document a process to onboard service providers. We recommend including a checklist of items (SLAs, questions, etc.) that should be considered throughout the onboarding process.

Enablement

Technology

Technology

The Southern Middle LWDA faces technology limitations that lead to process inefficiencies.

Focus area	Key observation
Limitations of VOS	Interviewees expressed the following concerns with respect to the VOS system: VOS does not have the capabilities to track referrals and co-enrolments, so these metrics are currently being monitored by manually reviewed case notes and then tracked in Excel. Reporting in VOS can be difficult, especially when some fields have to be updated multiple times. Interviewees mentioned that it would be helpful if VOS had the functionality to automatically populate fields. End-users did not find that the online directions and training on VOS were very valuable. The training provided is considered too broad and does not go into enough depth to be helpful.
System integration	There is a lack of integration between IT systems (Grants4TN, Jobs4TN and QuickBooks, the accounting system utilized by the Fiscal Agent) causing a large degree of manual reconciliation and increasing the risk of inaccurate reporting. For example, participant payments must be appropriately allocated to the correct program funding stream in VOS. This data must then be accurately recorded in Grants4TN by the Fiscal Agent when requesting funds from the State.
Manual activities	Provider invoices are provided with up to 400 pages of supporting documentation (paper copy), making the process of reviewing expenses for disallowed costs tedious and time-consuming.

Recommendations

- Consider the feasibility of implementing integrations between systems to avoid duplicate data entry. This could be via system interfaces, data entry bots, optical character technology, matching technology or other means.
- We recommend implementing data validation checks within the VOS system functionality, specifically in areas where there are frequent errors.
- We recommend providing hands-on training for end users of VOS. We recommend identifying a "systems champion" (for VOS and Grants4TN) at the state level that can be used a source of information and training for the endusers.

Enablement

Skills and communication

Skills and communication

There are opportunities to enhance role performance by providing targeted training and educating key stakeholders on firewall allowed and disallowed activities

Focus area	Key observation

Skills	▸ There is an opportunity to provide dedicated training to the CLEO, OSO and CSP on specific areas that can enhance performance of role activities. This includes targeted training on WIOA budget oversight, performance management and WIOA youth program, respectively.
	▸ Apparent skill gaps existed upon the appointment and procurement of service providers:
	  ▸ Upon appointment, the fiscal agent had no previous experience in this area and had to lean heavily on other areas for support.
	  ▸ The CSP had little experience in Youth Services.
	  ▸ The OSO did not have an understanding of reporting requirements and relied on the WIOA Program Director to prepare reports.
	Although these skill gaps have closed as providers have educated themselves, this may have led to inefficient operations and affected performance during the initial months of the contracts.

Communication	▸ The WIOA Program Director and Regional Director work closely together on a day-to-day basis. There is a strong working relationship, collaboration, trust and open two-way communication between both roles. The WIOA Program Director and Regional Director mentioned they do not have communications gaps with the state.
	▸ Based on our interviews, key stakeholders may not understand the firewall concept:
	  ▸ SCTDD's WIOA Program Director has been performing functions that are responsibility of the OSO, violating the firewall.
	  ▸ The OSO described the firewall as a impediment to effective communication. She mentioned that as OSO, she is not to manage or provide training over career services staff. However, she feels that she has more background and knowledge of certain programs, and therefore, she should be able to answer questions from career staff when the CSP Manager is not able to.
	  ▸ Several interviewees mentioned that having a clear list of allowable and non-allowable communication between parties would be helpful.

Recommendations

- We recommend providing targeted training to the CLEO, OSO and CSP to better equip these roles in performing role functions.
- Develop a communication that includes practical examples of firewall allowed and disallowed communication topics and activities for SMTLWDA to better understand the appearance of conflict of interest provision.

Appendices

Appendix A: RACI matrix

Activity	Sub-activity	TDLWD/Central Office	Regional Director	CLEO/LEOs	LWDB	Fiscal Agent	WIOA Program Director	OSO	Career Service Provider
Vendor due diligence*	Define procurement policies	I	I	A	A	R	R	I	I
	Define procurement processes, tools and templates	I	I	A	A	R	A	I	I
	Perform sourcing risk management	I	I	A	A	R	R	I	I
	Action procurement policy noncompliance	R	R	A	A	C/I	C/I	I	I
Vendor selection*	Prepare and conduct market assessment	I	I	A	A	R	R	I	I
	Develop RFP to include KPIs and targets	I	I	A	A	R	R	I	I
	Review and approve RFP	I	I	R	R	C	C		
	Distribute RFP	I	I	A	A	R	R	I	I
	Prepare and conduct sourcing and bid event (Q&A)	I	I	A	A	R	R		
	Conduct sourcing evaluations	I	I	R	R**	C	C		
	Select vendor	I	I	R	R**	C	C		

*Refers to competitive RFP process
**Executive Committee appointed as Selection Committee by Local Board and authorize to make selection

R – Responsible, A – Accountable, C – Consulted, I – Informed

Appendix A: RACI matrix

Activity	Sub-activity	TDLWD/ central office	Regional director	CLEO/LEOs	LWDB	Fiscal agent	WIOA Program Director	OSO	Career service provider	Legal
Contract and grant management	Contract creation and authorization	I	C	A	R/A	R/A	R/A	I	I	C
	Contract execution	I	C	A	A	R/A	R/A	C	C	
	Contract monitoring	I	C	A	A	R/A	R/A	C	C	
	Contract compliance	I	C	A	A	R/A	R/A	C	C	C
Operational compliance and monitoring	Determine operational KPIs*	C	C	A	A	R	R	I	I	
	Monitor and track performance against operational KPIs* (ACJ Dashboard)	I	R	A	A	C	R	R	R**	
	Execute performance reviews	I	R	A	A	R	R	R	R	
	Report scorecards and performance results	I	R	A	A	C	R	R	C	
Regulatory compliance and monitoring	Develop SMTLWDA Strategic Plan	I	R	A	A	C	R	C	C	
	Communicate regulatory requirements and policy changes	R	R	R	A	R	R	R	R	C
	Monitor and track performance against negotiated performance measures	R	R	A	A	R	R	R	R	
	Monitor and track performance against fiscal requirements	I	I	A	A	R	R	R	R	
	Execute performance reviews	I	C	A	A	I	R	R	R	C
	Report scorecards and performance results	R	R	A	A	R	R	R	R	
	Identify and correct noncompliance	R	R	A	A	R	R	R	R	

*Refers to operational requirements
**Includes AJC partners

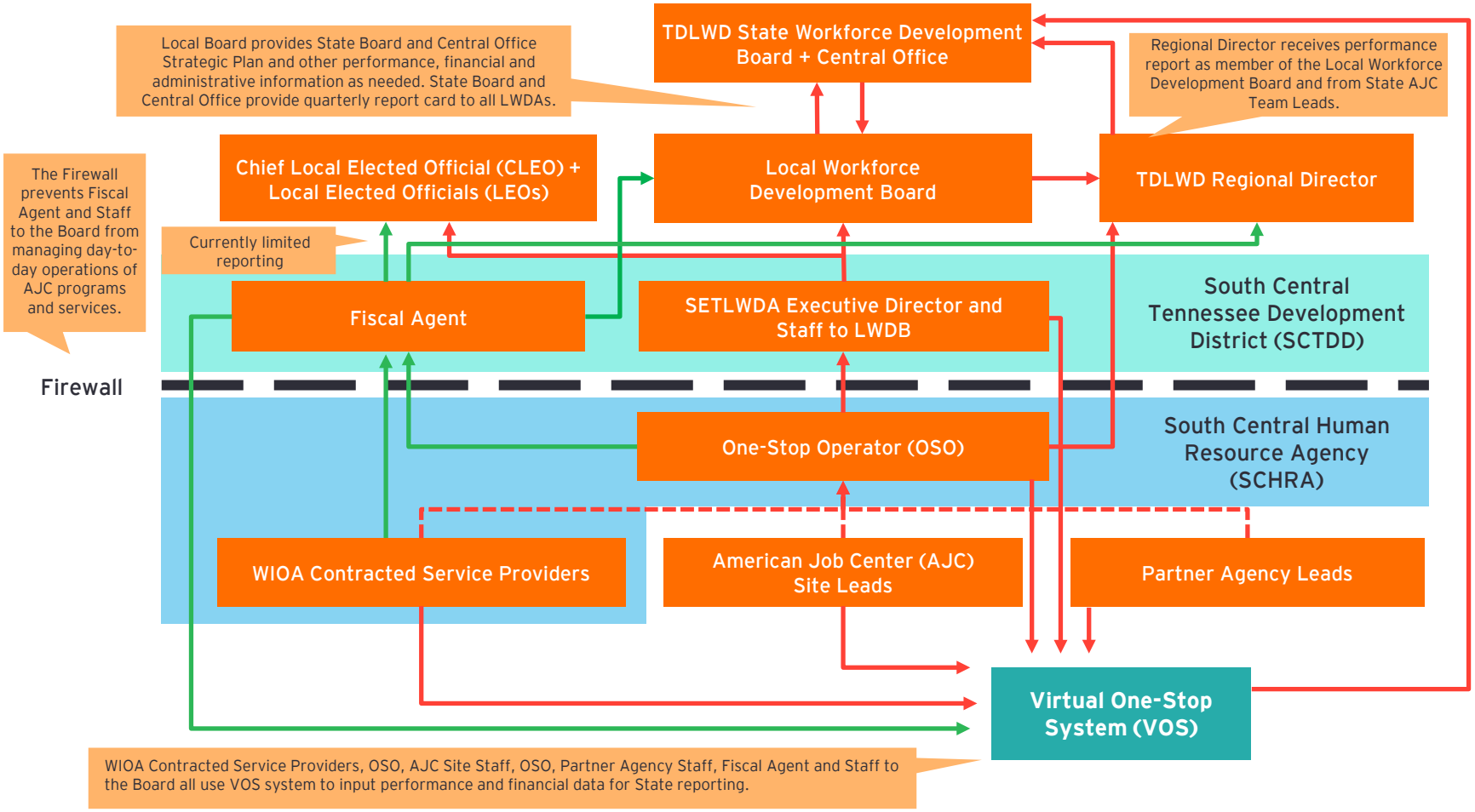
R – Responsible, A – Accountable, C – Consulted, I – Informed

Appendix A – RACI matrix

Activity	Sub-activity	TDLWD/ central office	Regional director	CLEO/LEOs	LWDB	Fiscal agent	WIOA Program Director	OSO	Career service provider	Partners
Financial Management	Develop SMTLWDB Budget	I	I	A	R/A	R/A	R/A	I	I	I
	Approve SMTLWDB Budget	I	R	A	A	R	R	I	I	R
	Develop IFA	I	R	A	R/A	R/A	R/A	R/A	R/A	R
	Approve IFA	R	R	A	A	R	R	I	I	R/A
	Prepare expenditure and contract status reports (monthly)	I	I	A/I	A/I	R/A	R/A	I	I	C
	Review and approve expenditure reports	R	C	A/I	A/I	R/A	R/A	I	I	I
	Review OSO and CSP Invoices	I		A/I	A/I	R/A	R/A	R/A	R/A	
	Pay OSO and CSP invoices and expenses	A	C	A	A	R	C	C	C	C
	Pay operating expenses	I	C	A/I	A/I	R/A	R	R	R	C
	Submit reimbursement claims	I	I	A/I	A/I	R/A	R/A	I	I	I
	Monitor expenditures	I	I	A/I	A/I	R/A	R/A	R	R	C

R – Responsible, A – Accountable, C – Consulted, I – Informed

Appendix B: Current SMTLWDA organizational structure



Financial reporting includes adherence to financial and fiscal requirements and responsibilities.
Performance targets reporting includes operational and regulatory requirements and responsibilities.
Updates to OSO as requested to include updates, needs and issues.

Appendix C: Technology landscape

System	Purpose	Users	Key usage areas			Risks and observations
			Financial Management	Performance and Contract Management	One-stop Job Center Operations	
Jobs4TN/ VOS	Collect and maintain customer data as a part of the referral process. Serves as a repository for referrals and other metrics that is used by the State to develop performance reports. Used to perform analysis of data for trends and performance by the Staff to the Board.	AJC Staff, TDLWD, Staff to the Board, OSO and participants		X	X	The OSO provides training on VOS and guidance is available through the Career Advisor Notebook. During interviews, key stakeholders described the system as not user friendly, slow in processing information, and mentioned instances where systems does not load and causes individuals to re-enter information in again. This may lead to confusion and errors when using system, causing data integrity issues.
Grants4TN	Used to maintain records of financial transactions and to request funds from the State. Also used to evaluate performance regarding financial requirements.	Fiscal Agent	X	X		Data is manually entered into the accounting system then again in grants4tn- no communication between the two. This is a very timely process and also poses the risk of data integrity.
EMSI (Economic Modeling Systems International)	Internal report generating tool used for labor market analysis. It used to identify skills gaps and in-demand industries, in an effort to meet the LWDA's specific needs.	Staff to the Board		X		Limited risks, as it is only used to generate reports. But there is concern that funding for this system will not be approved in the near future.
Excel	Workbooks used to calculate expense allocations based on methods and formulas based on IFA and federal and state requirements. Also used for internal purposes to track grants and contracts.	Fiscal Agent		X	X	Risk associated with this specific use of Excel is the knowledge required to use the worksheets correctly, which could potentially result in inaccurate reports to the state. Having expense allocations embedded within accounting system decreases data entry and duplication.

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