

# Tennessee PYs 2020-2023

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# Overview

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the Secretary of the U.S. Department of Labor that outlines a four-year strategy for the State's workforce development system. The publicly-funded workforce development system is a national network of Federal, State, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and supports to help all job-seekers secure good jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans in place to receive funding for core programs. WIOA reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better alignment of Federal investments in job training, to integrate service delivery across programs and improve efficiency in service delivery, and to ensure that the workforce system is job-driven and matches employers with skilled individuals. One of WIOA's principal areas of reform is to require States to plan across core programs and include this planning process in the Unified or Combined State Plans. This reform promotes a shared understanding of the workforce needs within each State and fosters development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans.

## Options for Submitting a State Plan

A State has two options for submitting a State Plan— a Unified State Plan or a Combined State Plan. At a minimum, a State must submit a Unified State Plan that meets the requirements described in this document and outlines a four-year strategy for the core programs. The six core programs are—

- the Adult program (Title I of WIOA),
- the Dislocated Worker program (Title I),
- the Youth program (Title I),
- the Adult Education and Family Literacy Act program (Title II), and
- the Wagner-Peyser Act Employment Service program (authorized under the Wagner-Peyser Act, as amended by title III),
- the Vocational Rehabilitation program (authorized under Title I of the Rehabilitation Act of 1973, as amended by Title IV).

Alternatively, a State may submit a Combined State Plan that meets the requirements described in this document and outlines a four-year strategy for WIOA's core programs plus one or more of the Combined State Plan partner programs. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. If included, Combined State Plan partner programs are subject to the "common planning elements" (Sections II-IV of this document) where specified, as well as the program-specific requirements for that program where such planning requirements exist separately for the program. The Combined State Plan partner programs are—

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)
- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et seq.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))<sup>1</sup>
- Reintegration of Ex-Offenders program (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

[1] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried out by the Department of Housing and Urban Development that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

## How State Plan Requirements Are Organized

The major content areas of the Unified or Combined State Plan include strategic and operational planning elements. WIOA separates the strategic and operational elements to facilitate cross-program strategic planning.

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.

- The **Operational Planning Elements** section identifies the State's efforts to support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:
  - State Strategy Implementation,
  - State Operating Systems and Policies,
  - Assurances,
  - Program-Specific Requirements for the Core Programs, and
  - Program-Specific Requirements for the Combined State Plan partner programs. (These requirements are available in a separate supplemental document, Supplement to the Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements. The Departments are not seeking comments on these particular requirements).

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.<sup>2</sup> States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations.

**Paperwork Reduction Act:** The Paperwork Reduction Act of 1995 (PRA) provides that an agency may not conduct, and no person is required to respond to, a collection of information unless it displays a valid OMB control number. Public reporting burden for this information collection is estimated to be 86 hours per state; including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responding to this collection is required to obtain or retain the Federal grant benefit. In addition, responses to this information collection are public, and the agencies offer no assurances of confidentiality. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Workforce Investment, and reference OMB control number 1205-0522. Note: Please do not return the completed plan to this address.

[2] Target populations include individuals with barriers to employment, as defined in WIOA Sec. 3, as well as veterans, unemployed workers, and youth.

# I. WIOA State Plan Type and Executive Summary

## a. WIOA State Plan Type

**Unified or Combined State Plan.** Select whether the State is submitting a Unified or Combined State Plan. At a minimum, a State must submit a Unified State Plan that covers the six core programs.

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**Unified State Plan.** This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs.

**Combined State Plan.** This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs, as well as one or more of the optional Combined State Plan partner programs identified below.

This is a combined plan

## Combined Plan Partner Program(s)

Indicate which Combined Plan partner program(s) the state is electing to include in the plan.

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)

No

Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)

Yes

Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))

Yes

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))

No

Trade Adjustment Assistance for Workers programs (activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))

No

Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)

Yes

Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)

Yes

Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))

Yes

Employment and training activities carried out by the Department of Housing and Urban Development

No

Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))

Yes

## b. Plan Introduction or Executive Summary

The Unified or Combined State Plan may include an introduction or executive summary. This element is optional.

The Tennessee Workforce Innovation & Opportunity Act (WIOA) Plan embodies the essence of the State's vision to have the nation's premier workforce system. Broadly speaking Tennessee's public workforce system includes three primary state workforce agencies: Labor and Workforce Development, Human Services and Education. However, the Department(s) of Economic and Community Development and Corrections were key contributors to the design and coordination of strategic and operational components.

We will continue to leverage our existing assets in each local workforce development area to attract new businesses and to help our existing businesses expand and remain competitive. The services we provide across the State have allowed Tennesseans to successfully enter the workforce despite numerous barriers to employment. By providing services to employers and citizens, we are paving the way for a brighter future for all Tennesseans.

The WIOA plan focuses on four key elements:

1. Improving skills and credential attainment by expanding vocation education and workforce development programs;
2. Supporting regional and rural economic development strategies;
3. Enhancing services and opportunities for justice-involved citizens; and
4. Streamlining the delivery of support services in workforce development by collaborating with key agencies and organizations.

Our realigned Local Workforce Development Areas foster collaborative engagement among local leaders and partners in the areas of workforce, education, and economic development. This effort gives communities increased access to higher education and training opportunities. The realignment also enables Tennessee's state agencies to deliver services and manage public resources in a sound, fiscally conservative manner. Through a focus on deliberate collaboration with essential partners, we strive to carry forward our work in a more intentional and meaningful manner for the benefit of all Tennesseans.

As we move into the future, Tennessee acknowledges the rapidly changing world of technology, workforce, and business. The State also recognizes emerging challenges faced by citizens to participate in the workforce due to changing employer demands for specific skills. These factors guide Tennessee's long-term success. The development of this year's WIOA plan serves as a necessary opportunity to evaluate all aspects of our workforce system to chart a promising path toward our goal.

## II. Strategic Elements

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State's current economic environment and identifies the State's overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs to support economic growth. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs.

### a. Economic, Workforce, and Workforce Development Activities Analysis

The Unified or Combined State Plan must include an analysis of the economic conditions, economic development strategies, and labor market in which the State's workforce system and programs will operate.

#### 1. Economic and Workforce Analysis

##### A. Economic Analysis

The Unified or Combined State Plan must include an analysis of the economic conditions and trends in the State, including sub-State regions and any specific economic areas identified by the State. This must include—

###### i. Existing Demand Industry Sectors and Occupations

Provide an analysis of the industries and occupations for which there is existing demand.

###### ii. Emerging Demand Industry Sectors and Occupations

Provide an analysis of the industries and occupations for which demand is emerging.

###### iii. Employers' Employment Needs

With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

###### i. Existing Demand Industry Sectors and Occupations

The Tennessee economy continued its growth in 2018, with nonagricultural employment increasing from 3,011,300 to 3,060,300. The average number of employing establishments grew more rapidly than in 2017, the state labor force expanded by 1.7 percent, and state unemployment rates continued their decline to 3.5 percent. Per capita income advanced almost as quickly as the U.S. in 2016-2017 as average wages rose by 3.6 percent and poverty rates declined to 16.7 percent. The short-term job outlook is for annual average employment growth of at least 1.2 percent through the third quarter of

2020, with expected total openings of 813,110 over the two year period. From 2016 to 2017, non-fatal injuries and illnesses on the job were also reduced.

Much of the following narrative can be found in Tennessee's Economy: 2018 Reference Guide, published in September 2018 and available at <https://www.tn.gov/workforce/general-resources/major-publications0/major-publications-redirect/public-reports-redirect/tennessees-economy.html>. Data sources are listed below each table.

Tennessee's average annual nonfarm employment increased 1.6 percent from 2017 to 2018, adding 49,000 jobs. Goods-producing jobs grew at a rate of 2.0 percent compared to 1.7 percent for private service-providing jobs. Jobs in the government sector grew at 1.2 percent. In the goods-producing sector, manufacturing grew by 4,400 jobs, while mining, logging, and construction grew by 4,800 jobs.

Among the private service-providing industries, those with the largest job increases were leisure and hospitality which added 10,000 jobs, and trade, transportation and utilities which added 7,500 jobs. Within the leisure and hospitality sector, accommodation and food services accounted for 7,900 of the added jobs while transportation and utilities accounted for 4,300 of the 7,500 jobs. Education and health services were the next largest group.

Since 2013, Tennessee has added more than 300,000 jobs, a 10.9 percent increase. Professional and business services led the way adding 58,600 jobs. Of those jobs, 22,900 were added in administrative support, waste management and remediation services, and 24,100 were added in professional, scientific and technical services. Other sectors gaining over 25,000 jobs included durable goods manufacturing; trade, transportation and utilities; healthcare and social assistance; and accommodation and food services. Only federal government has experienced a decline since 2013.

**Table 1: Tennessee Industry Employment, 2013-2018**

<b>Industry Employment (in thousands)</b>	<b>2013</b>	<b>2017</b>	<b>2018</b>	<b>17-18</b>	<b>17-18%</b>	<b>13-18</b>	<b>13-18%</b>
Total Nonfarm	2759.9	3011.3	3060.3	49.0	1.6%	300.4	<b>10.9%</b>
Goods Producing	424.1	470.6	479.9	9.3	2.0%	55.8	<b>13.2%</b>
Mining, Logging, & Construction	107.9	124.4	129.2	4.8	3.9%	21.3	<b>19.7%</b>
Manufacturing	316.2	346.3	350.7	4.4	1.3%	34.5	<b>10.9%</b>
Durable Goods Manuf.	199.2	220.0	224.3	2.3	1.0%	25.1	<b>12.6%</b>
<b>Non-Durable Goods Manufacturing</b>	117.0	124.2	126.5	2.3	1.9%	9.5	<b>8.1%</b>
Private Service-Providing	1913.1	2110.3	2144.9	34.6	1.6%	231.8	<b>12.1%</b>
Trade, Transportation, & Utilities	579.1	619.7	627.2	7.5	1.2%	48.1	<b>8.3%</b>
Wholesale Trade	118.5	118.1	119.7	1.6	1.4%	1.2	<b>1.0%</b>
Retail Trade	315.1	336.0	337.6	1.6	0.5%	22.5	<b>7.1%</b>
Transportation & Utilities	145.5	165.6	169.9	4.3	2.6%	24.4	<b>16.8%</b>
Information	44.3	46.1	45.5	-0.6	-1.3%	1.2	<b>2.7%</b>

<b>Industry Employment (in thousands)</b>	<b>2013</b>	<b>2017</b>	<b>2018</b>	<b>17-18</b>	<b>17-18%</b>	<b>13-18</b>	<b>13-18%</b>
Financial Activities	138.9	158.7	162.5	3.8	2.4%	23.6	<b>17.0%</b>
Finance & Insurance	106.0	119.0	121.8	2.8	2.4%	15.8	<b>14.9%</b>
Real Estate, Rental & Leasing	32.9	39.7	40.7	1.0	2.5%	7.8	<b>23.7%</b>
Professional & Business Services	358.3	411.4	416.9	5.5	1.3%	58.6	<b>16.4%</b>
Professional, Scientific & Technical Services	116.5	137.2	140.6	3.4	2.5%	24.1	<b>20.7%</b>
Management of Companies & Enterprises	39.2	48.9	50.8	1.9	3.9%	11.6	<b>29.6%</b>
Admin. Support, Waste Mgt. & Remediation Services	202.6	225.4	225.5	0.1	0.0%	22.9	<b>11.3%</b>
Education & Health Services	401.1	430.9	435.6	4.7	1.1%	34.5	<b>8.6%</b>
Educational Services	53.5	60.0	60.4	0.4	0.7%	6.9	<b>12.9%</b>
Health Care & Social Assistance	347.5	370.8	375.2	4.4	1.2%	27.7	<b>8.0%</b>
Leisure & Hospitality	285.9	328.9	338.9	10.0	3.0%	53.0	<b>18.5%</b>
Arts, Entertainment & Recreation	31.1	37.6	39.7	2.1	5.6%	8.6	<b>27.7%</b>
Accommodation & Food Services	254.8	291.3	299.2	7.9	2.7%	44.4	<b>17.4%</b>
Other Services	105.6	114.6	118.3	3.7	3.2%	12.7	<b>12.0%</b>
Government	422.6	430.4	435.5	5.1	1.2%	12.9	<b>3.1%</b>
Federal Government	49.5	49.1	49.1	0.0	0.0	-0.4	<b>-0.8%</b>
State Government	94.5	98.0	99.0	1.0	1.0%	4.5	<b>4.8%</b>
Local Government	<b>278.7</b>	<b>283.3</b>	<b>287.4</b>	<b>4.1</b>	<b>1.4%</b>	<b>8.7</b>	<b>3.1%</b>

The table above shows that total Tennessee nonfarm employment was 3 million, 60 thousand in 2018. The most rapidly growing industries during 2013-2018 were: management of companies and enterprises; arts, entertainment and recreation; real estate rental and leasing; professional, scientific, and technical services; and mining, logging, and construction.

From a base of 3.3 million jobs in 2018, total employment for Tennessee, including agricultural, self-employed, and private household workers, is expected to grow to 3.4 million by 2020. Expected to increase by 1.2 percent annually, Tennessee's expanding economy is continuing steady growth

across all industry sectors. Most of the employment growth will be in the service-providing industries with an annual growth rate of 1.3 percent and the addition of 65,200 jobs.

The service-providing sector is expected to grow slightly faster than the goods-producing sector over this period w (1.3 to 1.1 percent) with all sectors except information showing positive growth. Specifically, the leisure and hospitality and the professional and business services sectors are expected to grow the most rapidly, with 1.8 and 1.7 percent annual growth rates, respectively. Professional and business services and education and health services together are expected to create the most new jobs (33,400), nearly 41 percent of the total. In the goods-producing sector healthy growth within construction (2.1 percent) and the creation of 5,500 new jobs through 2019 can only be considered positive indicators.

**Table 2: Tennessee Major Industry Sector Employment, 2018-2020**

<b>Industry Sector Code</b>	<b>Title</b>	<b>New Jobs Created (Thousands)</b>	<b>Annual Average Growth Rate (%)</b>
<b>000000</b>	Total All Industries	81.9	<b>1.2%</b>
<b>101000</b>	Goods Producing	11.1	<b>1.1%</b>
<b>101100</b>	Natural Resources and Mining	0.9	<b>1.5%</b>
<b>101200</b>	Construction	5.5	<b>2.1%</b>
<b>101300</b>	Manufacturing	4.7	<b>0.7%</b>
<b>102000</b>	Service-Providing	65.2	<b>1.3%</b>
<b>102100</b>	Trade, Transportation, and Utilities	10.7	<b>0.8%</b>
<b>102200</b>	Information	-0.1	<b>-0.1%</b>
<b>102300</b>	Financial Activities	4.3	<b>1.3%</b>
<b>102400</b>	Professional and Business Services	14.4	<b>1.7%</b>
<b>102500</b>	Education and Health	19.0	<b>1.4%</b>
<b>102600</b>	Leisure and Hospitality	12.7	<b>1.8%</b>
<b>102700</b>	Other Services (except Government)	1.9	<b>0.8%</b>
<b>102800</b>	Government	2.3	<b>0.6%</b>
<b>102900</b>	<b>Self Employed and Unpaid Family</b>	<b>5.6</b>	<b>1.5%</b>

## **Fastest Growing Industries**

The average annual growth rate for all industries for 2018-2020 is expected to be 1.2 percent, with service-providing industries growing 0.2 percent faster than goods producing industries.

The fewest number of new jobs expected over this two year period will be in information (-100) and natural resources and mining (910). With just one in six new jobs being created in the goods producing versus the service-providing sector, the long term shift from the goods producing to the service sectors is clear.

The fastest growing detailed industries over this period not surprisingly align with the major service providing industry sectors experiencing growth in Tennessee.

**Professional and Business Services:** Expected to be the second fastest-growing major industry sector through 2020 at 1.7 percent, its growth will be propelled by several expanding business services industries:

- Computer systems design and related services (5.4 percent)
- Management, scientific, and technical consulting services (3.6 percent)
- Accounting, tax preparation, and payroll services (3.1 percent)

With the number of headquarters moving to Tennessee, management of companies and enterprises is growing by 3.5 percent annually. In addition, as commercial and industrial development grows in the low interest rate environment and outsourcing increases, these industries are booming:

- Facilities support services (11.8 percent)
- Waste treatment and disposal (7.1 percent)

**Financial Activities:** This industry is expected to expand by 1.3 percent annually. With low interest rates fueling growth in construction, several of the fastest growing industries relate to services for this industry:

- Commercial and industrial machinery and equipment rental and leasing (6.4 percent)
- Activities related to real estate (4.1 percent)
- Offices of real estate agents and brokers (3.9 percent)

Technological change is expanding new types of disruptive digital services in finance and insurance which will affect future job opportunities.

**Leisure and Hospitality:** This is the most rapidly-growing services industry sector in Tennessee, with a projected annual growth rate of 1.8 percent. The most rapidly growing sectors are projected to be:

- Sports and performing arts promoters (14.2 percent)
- Agents and managers for artists, athletes, and entertainers (5.1 percent)
- Drinking places (3.5 percent)

**Education and Health Services:** As the third most rapidly growing major industry sector in services (1.4 percent), it is also the sector expected to create the most new jobs (19,000). The largest educational industry is elementary and secondary schools, with an expected 164,870 employees in 2020. A small but fast-growing industry, which provides educational testing and consulting, is:

- Educational support services (2.7 percent)

In Healthcare and Social Services, rapidly growing industries include:

- Continuing care retirement communities and assisted living facilities (6.0 percent), expected to create 1,920 new jobs, and
- Individual and family services (2.9 percent)

Retirement communities will expand as the Tennessee population ages. Additional funding for youth services, men-tal health, and drug abuse and counseling, as well as social assistance for the developmentally disabled, will support the continual growth of family services.

The fastest growing service industries with more than 1,000 employment include promoters of performing arts, sports, and similar events (14.2 percent) and other information services (12.3 percent), including Internet publishing and broadcasting and web search portals; data processing, hosting, and related services (4.9 percent); and sound recording studios (4.3 percent). In the goods producing sector, manufacturing is expected to continue its growth through 2020. The detailed industries expected to grow most rapidly include motor vehicle and trailer manufacturing (13.4 percent), semiconductor and other electronic component manufacturing (7.5 percent), and ship and boat building (7.3 percent).

**Table 3: Fastest Growing Industries with More Than 1,000 in Employment in 2018**

Industry Title	2018 Employment	2020 Employment	New Jobs Created	Annual Average Growth Rate (%)
<b>Promoters of Performing Arts, Sports, and Similar Events</b>	2390	3120	730	<b>14.2</b>
<b>Motor Vehicle Body and Trailer Manufacturing</b>	2340	3010	670	<b>13.4</b>
<b>Other Information Services</b>	1060	1350	290	<b>12.3</b>
<b>Facilities Support Services</b>	5830	7280	1460	<b>11.8</b>
<b>Local Messengers and Local Delivery</b>	1070	1300	230	<b>10.2</b>
<b>Semiconductor and Other Electronic Component Manufacturing</b>	1300	1510	200	<b>7.5</b>
<b>Ship and Boat Building</b>	3500	4030	530	<b>7.3</b>
<b>Waste Treatment and Disposal</b>	2120	2430	310	<b>7.1</b>
<b>Commercial and Industrial Machinery and Equipment Rental and Leasing</b>	2790	1360	370	<b>6.4</b>

Industry Title	2018 Employment	2020 Employment	New Jobs Created	Annual Average Growth Rate (%)
<b>Furniture and Home Furnishing Merchant Wholesalers</b>	2120	2400	270	<b>6.2</b>
<b>Grant making and Giving Services</b>	2880	3250	370	<b>6.2</b>
<b>Continuing Care Retirement Communities and Assisted Living</b>	15430	17350	1920	<b>6.0</b>
<b>Computer Systems Design and Related Services</b>	20600	22900	2300	<b>5.4</b>
<b>Agents and Managers for Artists, Athletes, Entertainers, and Other Public Figures</b>	1070	1190	110	<b>5.1</b>
<b>Data Processing, Hosting, and Related Services</b>	5810	6390	580	<b>4.9</b>
<b>Other Personal Services</b>	5900	6440	540	<b>4.5</b>
<b>Architectural and Structural Metals Manufacturing</b>	9130	9960	830	<b>4.5</b>
<b>Sound Recording Industries</b>	2420	2630	210	<b>4.3</b>
<b>Activities Related to Real Estate</b>	10000	10840	840	<b>4.1</b>
<b>Offices of Real Estate Agents and Brokers</b>	<b>5940</b>	<b>6420</b>	<b>480</b>	<b>3.9</b>

**Computer and Mathematical Occupations, with an annual growth rate of 2.4 percent, is the fastest growing occupational group. Employment is expected to top 59,050 in the state by 2020, creating annual total openings of more than 5,130 and paying the second highest median wages (\$70,140) of the 22 occupational groups.**

The largest occupation was computer user support specialists (10, 590) in 2018, followed by computer systems analysts. The fastest growing mathematical occupations, with more than 30 employment in 2018, are operations research analysts (4.3 percent), statisticians (3.8 percent) and actuaries (2.2 percent). Among the computer occupations, the fastest growing are software developers, applications (4.3 percent) and software developers, systems (3.0 percent).

**Healthcare Support Occupations, the second most rapidly growing group (2.1 percent annually), has projected annual openings of 11,005. The median wage of \$27,919 is the fifth lowest among the occupational groups. The largest occupations in this group are nursing assistants, with projected employment of 33,190 in 2020 and 4175 openings, and medical assistants, with projected employment of 15,110 and expected 2,015 openings .**

The most rapidly growing occupations are home health aides (4.2 percent) and physical therapist aides (2.9 percent).

**Construction and Extraction Occupations is projected to be the third most rapidly growing occupational group in 2018-2020, with annual growth of 2 percent, 14,345 annual total openings, and median wage (\$38,076) close to the state median (\$34,895). The largest occupations are expected to be construction laborers, with 25,500 employments in 2018 and 3,055 openings, and electricians, with 12,490 employment and 1,625 annual openings.**

The most rapidly growing occupations in this industry are expected to be helpers of brick masons, block masons, stonemasons, tile, and marble setters (growing 3.8 percent annually) and roofer helpers, also expected to grow by 3.8 percent.

Related to construction are the **architecture and engineering occupations**, including many STEM (Science, Technology, Engineering, and Math) occupations. A complete list of STEM occupations, wages, and projected openings can be found in TDLWD's publication STEM Occupations (STEMReport2019updated.pdf), recently completed. Architecture and engineering occupations have the third highest median wages of the occupational groups and are expected to have more than 4,200 annual openings in the state.

**Management Occupations is the fourth fastest growing occupational category, with expected growth of 1.8 percent annually, creating 21,610 annual openings and paying the highest median wages (\$82,502). Some of the largest occupations and their expected employment in 2020 are: general and operations managers (49,430); food service managers (16,260); financial managers (15,080), and medical and health services managers (10,340).**

The most rapidly growing management occupation is property, real estate, and community association managers, as the construction industry booms and multi-family residential construction expands. These managerial jobs are expected to grow by 3 percent annually. Other rapidly growing jobs include financial managers (2.7 percent), marketing managers (2.3 percent), and computer and information system managers (4.6 percent), increasing in numbers as the technology sector expands.

**Protective Service Occupations is the sixth fastest growing major group, also increasing by 1.8 percent annually, and expected to create 8,650 jobs. Median wages are at the state median wage level. The number of jobs expected to be created annually by the largest occupations are: security guards (3,830), also the second fastest growing occupation in this category; police and sheriff's patrol officers (950); correctional officers and jailers (970), also the third most rapidly growing occupation; and firefighters (400). Increased focus on public safety due to mass shooting events may be increasing employment; adverse weather conditions are creating the need for more fire fighters to fight blazes locally and in other parts of the country.**

#### **Major Occupational Group Annual Total Openings**

The occupational groups creating the most new jobs are expected to be Office and Administrative Support (60,250 openings), Food Preparation and Serving Related (53,905 openings), Sales and Related (47,125 openings), Transportation and Material Moving (38,295 openings), and Production (32,530 openings).

**Production Occupations with the greatest number of openings include team assemblers, production worker helpers, production supervisors, inspectors and testers, packaging and filling machine operators and tenders, and machinists. Some of the fastest growing production occupations, on the other hand, include fiberglass laminators, tire builders, dental laboratory and medical appliance technicians, and computer numerically controlled machine tool programmers.**

The **Healthcare Practitioners and Technical Occupations** expected to create the most annual job openings include registered nurses (3,970), licensed practical nurses (2,075), and pharmacy technicians (1,055). However, the highest annual growth rates are expected for dietetic technicians (6.2 percent), physician assistants (3.5 percent), and nurse practitioners (3.5 percent).

### **The Nine Local Workforce Development Areas (LWDAs)**

#### **East Region**

The East Tennessee Region has the most Metropolitan Statistical Areas (six) of the three regions, possibly due to its mountainous geography. The area also had the greatest variation in growth rates from 2017 to 2018 among the MSAs, from -2.3 percent in the Cleveland MSA to 1.8 percent growth in the Chattanooga MSA. Except for Chattanooga, all MSAs had average employment growth rates below the state average of 1.6 percent.

The East Region includes the LWDAs of Northeast Tennessee, East Tennessee, and Southeast Tennessee. The top five industries in each area include food services and drinking places (which also has the lowest average weekly wage in each area), educational services, ambulatory health care services, administrative and support services, and hospitals (except in East Tennessee, where it ranks sixth).

Unique to Northeast Tennessee is the prominence of chemical manufacturing, which employs more than 9,500 people and has the highest weekly average wage. The East and Southeast Tennessee LWDAs both have strong professional, scientific, and technical employment (25,949 and 9,613 employment, respectively) and transportation equipment manufacturing industries. The professional, scientific, and technical industries also have the highest weekly wages in East and Southeast Tennessee.

In addition, East and Southeast Tennessee both have significant specialty trade contracting employment, evidence of construction employment in the low interest rate economy. Southeast Tennessee is also notable for its truck transportation industry, employing more than 10,500 workers and with wages in the middle of the pay range for the area.

#### **Middle Region**

There are only two MSAs in the Middle Region as more and more counties are being absorbed into the Nashville MSA. This MSA grew almost twice as rapidly (3.1 percent) as the state as a whole (1.6 percent) in 2017-2018. The Clarksville MSA also grew more rapidly than the rate for the state.

The three Middle Tennessee LWDAs include Upper Cumberland, Southern Middle, and Northern Middle Tennessee. Employment in the top 10 industries in Northern Middle Tennessee topped 500,000 employment, or nearly 50 percent of total employment for this LWDA.

Educational Services was the largest employer in both Upper Cumberland and Southern Middle Tennessee, with food services and drinking places among the top three industries across the region. In both Upper Cumberland and Southern Middle Regions, ambulatory health care employment was greater than hospital employment, followed by nursing and residential care employment among the top ten. However, in the Northern Middle LWDA, partly due to its regional trauma and children's hospitals, the hospital employment (51,303) exceeded employment in ambulatory care (50,473); nursing and residential care facilities was not among the top 10 industries.

Transportation equipment manufacturing was among the top 10 industries in all three LWDAs, ranking among the top 3 except in Northern Middle Tennessee. The highest paying industries were hospitals in Upper Cumberland; and professional, scientific, and technical industries in Southern and Northern

Middle areas. In Southern and Middle Tennessee, average pay in ambulatory care centers exceeded that of hospitals.

Unique to Northern Middle Tennessee in the top 10 list was merchant wholesalers of durable goods and specialty trade contractors, the latter supporting the construction boom in the Nashville area fueled by low interest rates and population growth.

### **West Region**

The two MSAs in the West Region, Jackson and Memphis, grew at about two thirds the average rate of growth in employment state wide. The Jackson MSA alone grew by 1.2 percent in 2017-2018, a substantial increase from the 0.1 job growth from 2016-2017.

The West Region LWDAs include Southwest, Northwest, and Greater Memphis. Two of the three LWDAs, Southwest and Northwest, count educational services among their top industries. Among the other top-employing industries were food services and drinking places (second and third largest) and hospitals (ranking third or fourth, except for Northwest Tennessee). Another top-ranking industry is ambulatory health care, ranking fourth, fifth, and sixth in the LWDAs. In Southwest Tennessee this is the highest paid industry among the top ten.

Unique in the top 10 in Southwest Tennessee were fabricated metal product manufacturing (3,256 employees) and machinery manufacturing (3,011), with average weekly wages of \$1,009 and \$965, respectively. Ranked tenth in Northwest Tennessee was another manufacturing industry, electrical equipment, appliance, and components manufacturing, paying the highest weekly wage (\$1,176) among their top industries. And couriers and messengers, employing 28,193 workers, was unique in the list to Greater Memphis. It was their highest paid industry, followed by ambulatory services.

### **MIDDLE SKILL OCCUPATIONS IN DEMAND BY LWDAs**

The following tables list the top middle skill occupations in demand in Tennessee, using the Tennessee Department of Labor and Workforce's newly completed LWDA occupational projections for 2016-2026. The first table lists in demand middle skill occupations and their number of expected annual openings due to growth and separations. The number of average annual openings by occupation projected from 2016 to 2026 is in most cases considerably larger than previous estimates of annual average openings for these occupations. This is due to the newly- developed separations methodology by the U.S. Department of Labor, Bureau of Labor Statistics. It includes greater numbers of annual job openings due to individuals transferring out of occupations earlier in their careers.

The later table lists these same middle skill occupations in demand and indicates whether they require a license in Tennessee, whether there was apprenticeship training in Tennessee in 2018, or whether there is a certification one could obtain related to that occupation.

### **Criteria for Supply and Demand for Workforce Services: Finding Demand Occupations**

There were five criteria used to develop a rating for each occupation included in the long-term occupational projections through 2026 for the Local Workforce Development Areas. Each criterion was weight-ed equally, with ratings ranging from 1 to 5. Five was the highest rating. For most LWDAs, only occupations requiring a high school degree or equivalent, postsecondary non-de-gree award, some college but no degree, or an associate's degree were included as middle skill occupations. For Northwest Tennessee, most occupations only met four of the five demand criteria, including at least a minimum entry level wage of \$28,000 or more, positive growth rates, and more than 10 annual average openings expected.

### **Five Criteria Used to determine if an Occupation was in Demand (one point each):**

1. The occupation is within a program of study with an expected positive growth rate from 2016 to 2026 in the LWDA. All occupations requiring more than short-term training (demand) have been assigned to programs of study which include one or more training programs (supply) from secondary career and technical education through graduate and professional studies which match the usual training requirements for that occupation. If all the occupations together in a program of study have a positive growth rate during the projection period, and the occupation is within a program of study with the number of awards [completers] no more than 1.5 times the number of annual total openings, the occupation was assigned a one.
2. The occupation in the LWDA had an entry-level annual wage of more than \$28,000 based on the 2018 Occupational Employment Survey (OES) for Tennessee.
3. For January 1 to March 31, 2019, for the occupation in the LWDA, the number of job candidates with active resumes on jobs4tn.gov was less than or equal to the number of job postings (the ratio of job candidates to job postings was 1.0 or less).
4. As a measure of occupational size, the ratio of annual job openings for the occupation in the LWDA divided by the total employed in the LWDA was >0.00001).
5. The occupation met the educational criteria for a middle skill occupation.

**Table 4: TN LWDA Middle Skill Occupations in Demand and their Annual Average Openings**

SOC Code	SOC Title	NE	ET	UC	SE	SM	NM	SW	NW	GM	Education Level
11-2022	Sales Managers	-	-	15	-	-	-	-	-	-	Bachelor's degree
11-3071	Transportation, Storage, and Distribution Managers	-	-	-	-	25	-	-	-	85	High school diploma or equivalent
11-9081	Lodging Managers	-	-	-	-	-	60	-	-	-	High school diploma or equivalent
11-9141	Property, Real Estate, and Community Association Managers	-	-	-	-	-	355	-	-	-	High school diploma or equivalent
11-1021	General and Operations Managers	-	-	140	-	-	-	-	-	-	Bachelor's degree
13-1031	Claims Adjusters, Examiners, and Investigators	-	-	-	-	-	-	-	-	175	High school diploma or equivalent
13-1161	Market Research Analysts and Marketing Specialists	40	-	-	-	-	-	-	-	-	Bachelor's degree
13-1199	Business Operations Specialists, All Other	70	-	-	-	-	-	-	-	-	Bachelor's degree

SOC Code	SOC Title	NE	ET	UC	SE	SM	NM	SW	NW	GM	Education Level
15-1132	Software Developers, Applications	40	-	10	-	-	-	-	-	-	Bachelor's degree
15-1134	Web Developers	-	-	-	25	-	95	-	-	40	Associate's degree
15-1141	Database Administrators	-	30	-	-	-	-	-	-	-	Bachelor's degree
15-1151	Computer User Support Specialists	-	-	-	70	-	500	15	-	215	Some college, no degree
17-3022	Civil Engineering Technicians	-	-	-	-	-	35	-	10	-	Associate's degree
17-3023	Electrical and Electronics Engineering Technicians	-	50	-	-	25	50	-	-	40	Associate's degree
17-3024	Electro-Mechanical Technicians	-	10	-	-	-	-	-	-	-	Associate's degree
17-3026	Industrial Engineering Technicians	-	-	-	-	-	-	-	10	45	Associate's degree
17-3027	Mechanical Engineering Technicians	-	-	-	-	20	-	-	-	-	Associate's degree
19-4031	Chemical Technicians	-	30	-	-	-	-	-	-	-	Associate's degree
19-4099	Life, Physical, and Social Science Technicians, All Other	-	-	-	45	-	-	-	-	-	Associate's degree
21-2011	Clergy	90	-	-	-	-	-	-	-	-	Bachelor's degree
25-2031	Secondary School Teachers, Except Special and Career/Technical Education	-	-	45	-	-	-	-	-	-	Bachelor's degree
29-1123	Physical Therapists	-	-	15	-	-	-	-	-	-	Doctoral or professional degree
29-1126	Respiratory Therapists	30	45	-	30	-	70	-	-	-	Associate's degree
29-1141	Registered Nurses	-	605	155	470	150	1300	200	-	720	Associate's degree
29-2032	Diagnostic Medical Sonographers	-	25	-	15	-	45	-	-	30	Associate's degree

SOC Code	SOC Title	NE	ET	UC	SE	SM	NM	SW	NW	GM	Education Level
29-2034	Radiologic Technologists	30	-	-	40	15	100	-	-	55	Associate's degree
29-2035	Magnetic Resonance Imaging Technologists	-	20	-	-	-	35	-	-	-	Associate's degree
29-2041	Emergency Medical Technicians and Paramedics	-	-	-	-	-	-	-	-	110	Postsecondary non-degree award
29-2055	Surgical Technologists	-	50	-	35	-	-	-	-	55	Postsecondary non-degree award
29-2061	Licensed Practical and Licensed Vocational Nurses	180	350	130	200	145	650	115	145	285	Postsecondary non-degree award
31-2011	Occupational Therapy Assistants	-	-	-	20	-	-	15	-	-	Associate's degree
31-2021	Physical Therapist Assistants	25	95	-	60	20	130	-	25	45	Associate's degree
31-9091	Dental Assistants	-	-	-	-	-	-	25	-	-	Postsecondary non-degree award
33-1021	First-Line Supervisors of Fire Fighting and Prevention Workers	-	20	-	-	-	-	-	-	-	Postsecondary non-degree award
33-3051	Police and Sheriff's Patrol Officers	-	180	-	-	65	275	-	-	185	High school diploma or equivalent
35-1011	Chefs and Head Cooks	-	-	-	-	-	120	-	-	-	High school diploma or equivalent
41-1012	First-Line Supervisors of Non-Retail Sales Workers	-	-	15	-	-	-	20	15	-	High school diploma or equivalent
41-3021	Insurance Sales Agents	-	-	-	-	30	-	-	-	155	High school diploma or equivalent
41-3099	Sales Representatives, Services, All Other	-	-	-	210	-	-	-	20	-	High school diploma or equivalent
41-4012	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	-	-	-	-	-	-	-	55	-	High school diploma or equivalent
43-	First-Line Supervisors of Office and	-	-	-	420	160	1585	115	-	620	High school diploma or

SOC Code	SOC Title	NE	ET	UC	SE	SM	NM	SW	NW	GM	Education Level
1011	Administrative Support Workers										equivalent
43-3051	Payroll and Timekeeping Clerks	-	-	-	-	15	135	-	-	-	High school diploma or equivalent
43-4011	Brokerage Clerks	-	-	-	-	-	90	-	-	-	High school diploma or equivalent
43-5011	Cargo and Freight Agents	-	-	-	-	-	-	-	-	55	High school diploma or equivalent
43-5061	Production, Planning, and Expediting Clerks	-	-	20	-	90	-	-	-	190	High school diploma or equivalent
43-6011	Executive Secretaries and Executive Administrative Assistants	-	-	-	-	-	435	-	-	-	High school diploma or equivalent
47-1011	First-Line Supervisors of Construction Trades and Extraction Workers	-	-	-	-	-	430	-	35	-	High school diploma or equivalent
47-2031	Carpenters	-	-	-	-	20	-	-	-	-	High school diploma or equivalent
47-2071	Paving, Surfacing, and Tamping Equipment Operators	-	-	-	-	-	-	-	10	-	High school diploma or equivalent
47-2111	Electricians	-	-	-	-	95	560	-	40	-	High school diploma or equivalent
47-2121	Glaziers	-	30	-	-	-	-	-	-	-	High school diploma or equivalent
47-2152	Plumbers, Pipefitters, and Steamfitters	-	-	-	-	-	350	-	-	-	High school diploma or equivalent
47-2211	Sheet Metal Workers	30	-	-	-	-	-	-	-	-	High school diploma or equivalent
49-1011	First-Line Supervisors of Mechanics, Installers, and	-	-	-	-	70	380	-	25	160	High school diploma or

SOC Code	SOC Title	NE	ET	UC	SE	SM	NM	SW	NW	GM	Education Level
	Repairers										equivalent
49-2021	Radio, Cellular, and Tower Equipment Installers and Repairers	-	-	-	-	-	35	-	-	-	Associate's degree
49-2022	Telecommunications Equipment Installers and Repairers, Except Line Installers	60	-	-	-	-	-	-	-	-	Postsecondary non-degree award
49-2098	Security and Fire Alarm Systems Installers	-	60	-	-	-	100	-	-	35	High school diploma or equivalent
49-3031	Bus and Truck Mechanics and Diesel Engine Specialists	-	140	-	100	30	210	35	-	170	High school diploma or equivalent
49-3042	Mobile Heavy Equipment Mechanics, Except Engines	25	-	-	40	15	-	-	-	70	High school diploma or equivalent
49-3092	Recreational Vehicle Service Technicians	-	15	-	-	-	-	-	-	-	High school diploma or equivalent
49-9012	Control and Valve Installers and Repairers, Except Mechanical Door	-	15	-	-	-	-	-	-	-	High school diploma or equivalent
49-9021	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	-	215	-	80	35	-	-	45	155	Postsecondary non-degree award
49-9031	Home Appliance Repairers	-	15	-	-	-	-	-	-	-	High school diploma or equivalent
49-9041	Industrial Machinery Mechanics	-	-	-	-	-	180	-	-	-	High school diploma or equivalent
49-9043	Maintenance Workers, Machinery	-	140	-	-	15	245	-	-	45	High school diploma or equivalent
49-9051	Electrical Power-Line Installers and Repairers	-	-	-	-	-	140	-	20	25	High school diploma or equivalent
49-9062	Medical Equipment Repairers	-	-	-	-	-	65	-	-	-	Associate's degree

<b>SOC Code</b>	<b>SOC Title</b>	<b>NE</b>	<b>ET</b>	<b>UC</b>	<b>SE</b>	<b>SM</b>	<b>NM</b>	<b>SW</b>	<b>NW</b>	<b>GM</b>	<b>Education Level</b>
51-1011	First-Line Supervisors of Production and Operating Workers	-	330	-	245	-	570	-	-	-	High school diploma or equivalent
51-2041	Structural Metal Fabricators and Fitters	-	-	-	-	-	-	-	-	15	High school diploma or equivalent
51-2091	Fiberglass Laminators and Fabricators	-	30	-	-	-	-	-	-	-	High school diploma or equivalent
51-4011	Computer-Controlled Machine Tool Operators, Metal and Plastic	-	-	-	15	20	-	-	-	15	High school diploma or equivalent
51-4022	Forging Machine Setters, Operators, and Tenders, Metal and Plastic	-	-	-	-	190	-	-	-	-	High school diploma or equivalent
51-4041	Machinists	-	-	-	-	-	-	-	-	160	High school diploma or equivalent
51-4051	Metal-Refining Furnace Operators and Tenders	-	20	-	-	-	-	-	-	-	High school diploma or equivalent
51-4111	Tool and Die Makers	-	-	-	-	-	75	-	-	-	Postsecondary non-degree award
51-4122	Welding, Soldering, and Brazing Machine Setters, Operators, and Tenders	-	-	-	60	-	-	-	-	-	High school diploma or equivalent
51-6091	Extruding and Forming Machine Setters, Operators, and Tenders, Synthetic and Glass Fibers	-	-	-	15	-	-	-	-	-	High school diploma or equivalent
51-8021	Stationary Engineers and Boiler Operators	-	15	-	-	-	-	-	-	10	High school diploma or equivalent
51-8099	Plant and System Operators, All Other	-	-	-	15	-	-	-	-	-	High school diploma or equivalent
51-9011	Chemical Equipment Operators and Tenders	-	40	-	-	-	-	-	-	-	High school diploma or equivalent
53-	Heavy and Tractor-Trailer Truck	-	1240	-	-	-	-	-	-	1415	Postsecondary

SOC Code	SOC Title	NE	ET	UC	SE	SM	NM	SW	NW	GM	Education Level
3032	Drivers										non-degree award
53-5021	Captains, Mates, and Pilots of Water Vessels	-	-	-	-	-	65	-	-	-	Postsecondary non-degree award
53-7032	Excavating and Loading Machine and Dragline Operators	-	-	-	30	-	-	20	20	-	High school diploma or equivalent

Sources: TN Dept. of Labor and Workforce Development, WIRED, 2016-26 LWDA Employment Projections and Supply/Demand Analysis; TDLWD 2018 OES Wages; Jobs4tn.gov Candidate/Job Posting Ratios

## ii. Emerging Demand Industry Sectors and Occupations

### Emerging Growth Sectors

The Solar Jobs Census of 2018 name Tennessee 14<sup>th</sup> in the U.S. for solar jobs, with an estimated 4,690 jobs in 2018[1]. They reported an estimated 2,835 jobs in installation; 1,348 in manufacturing; 316 in sales and distribution; 106 in operations and maintenance. The industries in which solar workers are employed are not easily identified in the current North American Industry Classification System (NAICS), but the data are slowly improving.[2]

The Tennessee Department of Economic and Community Development have identified emerging industries as those with low concentrations, or location quotients, in Tennessee but with rapid growth. In their Tennessee Business Services Cluster report (2018) they classify the business services industries of other scientific and consulting services; data processing; hosting, and related services; computer programming and systems design services; and testing laboratories as emerging industries in the state of Tennessee.[3]

Other emerging industries included among those with the highest expected growth rates in Tennessee through 2026 include electronic shopping and mail-order houses (NAICS 4541), continuing care retirement facilities (6233), and other information services (5191). The scheduled air transportation industry (4811) had been declining in Tennessee with reductions in air hubs, but has been re-emerging in Northern Middle LWDA as the Nashville economy has grown since 2012. Lists of the most rapidly growing industries in the LWDA's can be found in jobs4tn.gov, the FAQ section, and industry information. Occupations in these industries can be located in jobs4tn.gov under occupational staffing patterns.

Tennessee STEM employment is expected to increase from 138,100 in 2016 to 167,950 in 2026. TDLWD's recently released publication on STEM Occupations identifies 28 STEM occupations expected to have rapid employment growth during this period, including software developers, applications; information security analysts, computer user support specialists, and electrical and electronics engineering technicians. STEM occupations are growing faster than all occupations on average, and have higher average wages.

New funding opportunities are promoting emerging sectors in Tennessee in agriculture and transportation technology. Agricultural technology efforts are strengthening in Tennessee as funding is becoming available through such programs as AgLaunch365. Deployment of new types of transportation is encouraged by new funding available from the Tennessee Department of

Environment and Conservation, Office of Energy Programs, for transportation fleets using alternative fuel or all-electric transit of shuttle buses.

iii. Employers' Employment Needs

Education levels, apprenticeship opportunities, certifications, and licensing requirements for the middle skill occupations are listed in the second middle skill occupations table below.

**Table 5: TN LWDA Middle Skill Occupations in Demand: License, Apprenticeship, and Certification Opportunities**

SOC Code	SOC Title	Education Level	License Titles	Apprenticeship	Certifications
11-2022	Sales Managers	Bachelor's degree			
11-3071	Transportation, Storage, and Distribution Managers	High school diploma or equivalent			
11-9081	Lodging Managers	High school diploma or equivalent			Certified Hospitality and Tourism Management Professional (CHTMP)
11-9141	Property, Real Estate, and Community Association Managers	High school diploma or equivalent			
11-1021	General and Operations Managers	Bachelor's degree			Google Suite
13-1031	Claims Adjusters, Examiners, and Investigators	High school diploma or equivalent	Crop Adjuster, Public Adjuster		
13-1161	Market Research Analysts and Marketing Specialists	Bachelor's degree			Hootsuite Social Marketing Certification
13-1199	Business Operations Specialists, All Other	Bachelor's degree			
15-1132	Software Developers,	Bachelor's degree			

SOC Code	SOC Title	Education Level	License Titles	Apprenticeship	Certifications
	Applications				
15-1134	Web Developers	Associate's degree			CIW Web Foundation; CIW Web Design Specialist
15-1141	Database Administrators	Bachelor's degree			
15-1151	Computer User Support Specialists	Some college, no degree	CompTIA IT Fundamentals		
17-3022	Civil Engineering Technicians	Associate's degree			
17-3023	Electrical and Electronics Engineering Technicians	Associate's degree	Alarm System Contractor Qualifying Agent	Electronics Tester	Precision Measurement Instruments Certification
17-3024	Electro-Mechanical Technicians	Associate's degree		Electromechanical Technician	Production Certification (CPT) Safety Module; Production Certification (CPT) Safety Module
17-3026	Industrial Engineering Technicians	Associate's degree			Precision Measurement Instruments Certification
17-3027	Mechanical Engineering Technicians	Associate's degree			Precision Measurement Instruments Certification
19-4031	Chemical Technicians	Associate's degree		Chemical Laboratory Technician	
19-4099	Life, Physical, and Social Science Technicians, All Other	Associate's degree			
21-2011	Clergy	Bachelor's degree			
25-2031	Secondary School Teachers, Except Special and Career/Technical Education	Bachelor's degree	Teacher		

SOC Code	SOC Title	Education Level	License Titles	Apprenticeship	Certifications
29-1123	Physical Therapists	Doctoral or professional degree	Physical Therapist		
29-1126	Respiratory Therapists	Associate's degree	Respiratory Care Therapist		
29-1141	Registered Nurses	Associate's degree	Registered Nurse, Advanced Practice Nurse		
29-2032	Diagnostic Medical Sonographers	Associate's degree	X-Ray Operator		
29-2034	Radiologic Technologists	Associate's degree	Radiologist Assistant, X-Ray Operators Various Specialties		
29-2035	Magnetic Resonance Imaging Technologists	Associate's degree			
29-2041	Emergency Medical Technicians and Paramedics	Postsecondary non-degree award	Emergency Medical Responder, Emergency Medical Technician-Paramedic		OSHA 10 General Industry
29-2055	Surgical Technologists	Postsecondary non-degree award			
29-2061	Licensed Practical and Licensed Vocational Nurses	Postsecondary non-degree award	Licensed Practical Nurse		
31-2011	Occupational Therapy Assistants	Associate's degree	Occupational Therapy Assistant		
31-2021	Physical Therapist Assistants	Associate's degree	Physical Therapy Assistant		
31-9091	Dental Assistants	Postsecondary non-degree award	Dental Assistant		National Entry Level Dental Assistant (NELDA)
33-	First-Line	Postsecondary			

SOC Code	SOC Title	Education Level	License Titles	Apprenticeship	Certifications
<b>1021</b>	Supervisors of Fire Fighting and Prevention Workers	High school diploma or equivalent			
<b>33-3051</b>	Police and Sheriff's Patrol Officers	High school diploma or equivalent			
<b>35-1011</b>	Chefs and Head Cooks	High school diploma or equivalent			Certified Fundamentals Cook
<b>41-1012</b>	First-Line Supervisors of Non-Retail Sales Workers	High school diploma or equivalent			
<b>41-3021</b>	Insurance Sales Agents	High school diploma or equivalent	Insurance Producer, Automobile Association Agent, Title Insurance Agent, Surplus Lines Agent		
<b>41-3099</b>	Sales Representatives, Services, All Other	High school diploma or equivalent	Pest Control Solicitor/Technician, Boxer Promoter		
<b>41-4012</b>	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	High school diploma or equivalent			
<b>43-1011</b>	First-Line Supervisors of Office and Administrative Support Workers	High school diploma or equivalent	Contractor		Microsoft Office Specialist: (Excel)(PowerPoint)(Word); Google Suite; Quick Books Certified User
<b>43-3051</b>	Payroll and Timekeeping Clerks	High school diploma or equivalent			
<b>43-4011</b>	Brokerage Clerks	High school diploma or			

SOC Code	SOC Title	Education Level	License Titles	Apprenticeship	Certifications
		equivalent			
<b>43-5011</b>	Cargo and Freight Agents	High school diploma or equivalent			
<b>43-5061</b>	Production, Planning, and Expediting Clerks	High school diploma or equivalent			Microsoft Office Specialist (Excel)
<b>43-6011</b>	Executive Secretaries and Executive Administrative Assistants	High school diploma or equivalent			Microsoft Office Specialist: (Excel)(PowerPoint)(Word): Google Suite
<b>47-1011</b>	First-Line Supervisors of Construction Trades and Extraction Workers	High school diploma or equivalent			
<b>47-2031</b>	Carpenters	High school diploma or equivalent	Carpenter, Carpenter, Maintenance		NCCER Carpentry Level One
<b>47-2071</b>	Paving, Surfacing, and Tamping Equipment Operators	High school diploma or equivalent			
<b>47-2111</b>	Electricians	High school diploma or equivalent	Electrician		NCCER Electrical Level One
<b>47-2121</b>	Glaziers	High school diploma or equivalent			
<b>47-2152</b>	Plumbers, Pipefitters, and Steamfitters	High school diploma or equivalent	Pipe Fitter, Plumber		NCCER Plumbing Level One
<b>47-2211</b>	Sheet Metal Workers	High school diploma or equivalent		Sheet Metal Worker	
<b>49-1011</b>	First-Line Supervisors of Mechanics, Installers, and	High school diploma or equivalent			

SOC Code	SOC Title	Education Level	License Titles	Apprenticeship	Certifications
	Repairers				
<b>49-2021</b>	Radio, Cellular, and Tower Equipment Installers and Repairers	Associate's degree			
<b>49-2022</b>	Telecommunications Equipment Installers and Repairers, Except Line Installers	Postsecondary non-degree award			
<b>49-2098</b>	Security and Fire Alarm Systems Installers	High school diploma or equivalent	Alarm System Contractor Employee		
<b>49-3031</b>	Bus and Truck Mechanics and Diesel Engine Specialists	High school diploma or equivalent		Mechanic, Industrial Truck	
<b>49-3042</b>	Mobile Heavy Equipment Mechanics, Except Engines	High school diploma or equivalent			
<b>49-3092</b>	Recreational Vehicle Service Technicians	High school diploma or equivalent			
<b>49-9012</b>	Control and Valve Installers and Repairers, Except Mechanical Door	High school diploma or equivalent	Electric Meter Repairer		
<b>49-9021</b>	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	Postsecondary non-degree award		Heating & Air-Conditioner Install/Service	HVAC Excellence, Heating, Electrical, Air Conditioning Technology (H.E.A. T.)
<b>49-9031</b>	Home Appliance Repairers	High school diploma or equivalent			
<b>49-9041</b>	Industrial Machinery Mechanics	High school diploma or equivalent			

SOC Code	SOC Title	Education Level	License Titles	Apprenticeship	Certifications
49-9043	Maintenance Workers, Machinery	High school diploma or equivalent		Maintenance Mechanic	
49-9051	Electrical Power-Line Installers and Repairers	High school diploma or equivalent		Line Erector, Line Installer-Repairer	NCCER Electrical Level One
49-9062	Medical Equipment Repairers	Associate's degree			
51-1011	First-Line Supervisors of Production and Operating Workers	High school diploma or equivalent			
51-2041	Structural Metal Fabricators and Fitters	High school diploma or equivalent		Metal Fabricator	
51-2091	Fiberglass Laminators and Fabricators	High school diploma or equivalent			
51-4011	Computer-Controlled Machine Tool Operators, Metal and Plastic	High school diploma or equivalent			
51-4022	Forging Machine Setters, Operators, and Tenders, Metal and Plastic	High school diploma or equivalent			
51-4041	Machinists	High school diploma or equivalent		Machinist, Maintenance Machinist	Production Certification (CPT) Safety Module; Machining Level 1- Measurement, Materials, and Safety Certification; OSHA 10
51-4051	Metal-Refining Furnace Operators and Tenders	High school diploma or equivalent			
51-4111	Tool and Die Makers	Postsecondary non-degree award		Tool And Die Maker	

SOC Code	SOC Title	Education Level	License Titles	Apprenticeship	Certifications
51-4122	Welding, Soldering, and Brazing Machine Setters, Operators, and Tenders	High school diploma or equivalent			American Welding Society Certified Welder; AWS SENSE Advanced Level Welder
51-6091	Extruding and Forming Machine Setters, Operators, and Tenders, Synthetic and Glass Fibers	High school diploma or equivalent			
51-8021	Stationary Engineers and Boiler Operators	High school diploma or equivalent			
51-8099	Plant and System Operators, All Other	High school diploma or equivalent	Water Distribution System Operator Grade I, Water Distribution System Operator Grade II		
51-9011	Chemical Equipment Operators and Tenders	High school diploma or equivalent		Chemical Operator II Chemical Operator III	
53-3032	Heavy and Tractor-Trailer Truck Drivers	Postsecondary non-degree award	Commercial Driver		
53-5021	Captains, Mates, and Pilots of Water Vessels	Postsecondary non-degree award			
53-7032	Excavating and Loading Machine and Dragline Operators	High school diploma or equivalent			

Sources: *Jobs4tn.gov (licenses); U.S. Department of Labor, Office of Apprenticeship; Tennessee Department of Education, Division of College, Career and Technical Education (Tennessee Promoted Industry Certifications).*

Skills gaps arise in the Tennessee economy due to insufficient education levels compared to projected education levels needed, shortages of skilled workers in traditional occupations in rural and lower-income areas of the state, lack of “soft skills” and emotional intelligence on the part of workers in critical skill areas described above, lack of trained workers in areas of employer expansion or where the workforce is aging and retiring, and lower levels of skill attainment by those incarcerated who are now entering the workforce.

**Table 6: TN Critical Skills for Projected Employment to 2026**

Skills	2016 Employment	2026 Employment	Employment Increase 2016-2026
<b>Active Listening</b>		763,733	97,500
<b>Speaking</b>	645,135	744,521	99,386
<b>Reading Comprehension</b>	314,389	361,032	46,643
<b>Social Perceptiveness</b>	284,539	329,929	45,390
<b>Critical Thinking</b>	211,114	250,389	39,275
<b>Monitoring</b>	174,090	200,904	26,814
<b>Service Orientation</b>	158,088	184,808	26,720
<b>Writing</b>	166,790	183,041	16,251
<b>Coordination</b>	139,573	160,605	21,032
<b>Instructing</b>	128,090	143,489	15,399

Source: *Tennessee Long Term Projections, Report Manager August 2019*

The 2016 column above shows the most important skills in the 2016 workforce. The assignment of skills and importance ranking to occupations are based on scientifically-designed employer surveys by occupational analysts in the Employment and Training Administration at the U.S. Department of Labor. When occupations are growing, the skills in those occupations will be ranked more highly.

The five most critical skills required across occupations based on the estimated employment increases through 2026 include active listening, speaking, reading comprehension, social perceptiveness and critical thinking. With the growth in the service industry, especially in leisure and hospitality, food service, and customer service occupations, service orientation has grown in importance.

Increased decentralization of production and service processes require workers to take on more decision making roles. As processes become more complex and specialized, the need for teamwork and coordination is increasing.

The table below compares needed levels of educational achievement according to Tennessee statewide projections for 2016-2026 compared to Tennessee’s current levels of educational achievement. Tennessee needs to increase its rate of high school and college graduation to meet the needs of the future workforce.

**Table 7: TN Statewide Projections: Needed Levels of Educational Achievement, 2016-2026**

Education	TN Percent of Projected 2026 Employment at each level	Current TN Educational Achievement (%)
No formal educational credential	25.10%	13.5
High school diploma or equivalent	39.50%	32.6
Postsecondary non-degree award,, some college- no degree, and associate's degree	12.50%	27.9
Bachelor's degree	19.10%	16.5
Master's, doctoral or professional degree	3.90%	9.6
Total	100.10%	100

[1]Solar Foundation, The. (2018). *National Solar Jobs Census 2018*.  
<https://www.thesolarfoundation.org/solar-jobs-census/factsheets-2018-tn/>

[2]The current NAICS system classifies solar electric power generating facilities in 221114, and the NAICS code for solar installation is within 238220, electrical contractors and other wiring installation.

[3]John Patten and Jeremy Stiles. (May 2018). *Tennessee's Business Services Cluster*. Tennessee Department of Economic and Community Development , Center for Economic Research in Tennessee (CERT).

## B. Workforce Analysis

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA<sup>4</sup>. This population must include individuals with disabilities among other groups<sup>5</sup> in the State and across regions identified by the State. This includes—

[4] Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals.

[5] Veterans, unemployed workers, and youth, and others that the State may identify.

### i. Employment and Unemployment

Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State.

### ii. Labor Market Trends

Provide an analysis of key labor market trends, including across existing industries and occupations.

### iii. Education and Skill Levels of the Workforce

Provide an analysis of the educational and skill levels of the workforce.

### iv. Skill Gaps

Describe apparent 'skill gaps'.

## i. Employment and Unemployment

### Workforce in the East, Middle, and West

Population in 2018 for the state was estimated at 6,770,010, increasing by .91 percent over 2017. This is a slightly slower rate of growth than in the previous year. Two regions increased in population, with the Middle Region adding 43,717 people and the East Region adding 17,631. Average unemployment rates declined in all areas, for a state average of 3.5 percent, the lowest since 1976. The West continues to have the highest unemployment rates, including among youth.

### Employment and Unemployment, Including Youth

Average unemployment rates declined in all areas, with a state average of 3.5 percent, the lowest since 1976. The West Region continues to have the highest unemployment rate, 0.7 percentage points above the state rate. Youth unemployment (ages 16 to 24 years) was highest in the West Region (18.45 percent), more than five times the overall state rate. Youth unemployment in the Middle Region was about three and a half times the state rate; in the East, nearly four times greater. On a positive note, the number of youth in the labor force increased in the East and Middle Regions, while the number of those unemployed decreased. A total of 26,584 individuals in the labor force in the state were unemployed with a disability.

The Tennessee labor force participation rate remained several percentage points below the national rate in 2018. With more people returning to the workforce and new jobs being created, the national rate showed a slight increase for the year, from 62.7 percent in January to 63.1 percent in December, with an average for the civilian labor force in 2018 of 62.9 percent. Tennessee's rate continued to fluctuate during the year, reaching a high of 61.0 percent in April before dropping back to the January rate of 60.8 percent. The annual rate for Tennessee in 2018 was 61 percent. Research by Boyd Center for Business and Economic Research at the University of Tennessee found that the opioid crisis was one factor in Tennessee's labor force participation rate being lower than that of the nation.

**Table 8: TN Youth Employment, Ages 16-24**

Area	Labor Force	Unemployment	Rate
East Region	166,903	21,849	13.09%
Middle Region	199,958	24,398	12.20%
West Region	108,776	20,064	18.45%

Source: U.S. Census Bureau, 2013-2017 American Community Survey, 2017, 5-year estimates

### Poverty Rates by County and Region

Poverty rates vary by region, within regions, and within counties. The latest data on poverty rates are for 2017. All regions had poverty rates of 14.3 percent or greater, with the West Region having the highest rate at 20.2 percent; the East at 17.0 percent; and the Middle at 14.3 percent, with a state rate of 16.7 percent. All regions saw a decrease in poverty since 2015. Poverty rates tend to be greater in the core urban counties and rural areas in Middle Tennessee as well as in the other regions. Fifteen of Tennessee’s counties are considered “distressed”; 24 counties are considered “at risk”.

**Table 9: TN Regional Labor Force Data**

	<b>East Region</b>	<b>Middle Region</b>	<b>West Region</b>	<b>State Total</b>
<b>Population 2017</b>	2,386,506	2,761,534	1,560,754	6,708,794
<b>Population 2018</b>	2,404,137	2,805,251	1,560,622	6,770,010
<b>Amount of Change</b>	17,631	43,717	-132	61,216
<b>Percent Change</b>	0.74%	1.58%	-0.01%	0.91%
<b>Annual Average Unemployment Rate 2017 Percent</b>	3.90%	3.20%	4.50%	3.80%
<b>Annual Average Unemployment Rate 2018 Percent</b>	3.60%	3.00%	4.20%	3.50%
<b>Educational Attainment 25 Years and Over (2017) Some College Or Higher - Percent</b>	51.40%	56.50%	53.30%	53.90%
<b>Poverty Estimate, All Ages, Per- cent (2017)Ages, Per- cent (2017)</b>	17.00%	14.30%	20.20%	16.70%
<b>Percentage of Unemployed with a Disability (2017)</b>	15.40%	13.40%	11.90%	13.60%
<b>Percent of Those Not in the Labor Force with a Disability (2017)</b>	37.00%	31.70%	33.30%	34.10%

Source: U.S. Census, American Community Survey, 2017

### **Disability Status**

For the state in 2017, 197,648 individuals were identified with a disability in a labor force of 2,995,200. This is 6.6 percent. Those with a disability made up 13.6 percent of the unemployed. Of those not in the labor force, approximately 34 percent of individuals had a disability, demonstrating it can be a significant barrier to employment. The highest regional percentage of those not in the labor force and having a disability was in East Tennessee with 37.0 percent.

**Table 10: TN Disability Status of Those in the Labor Force, 2017**

Area	Civilian Non-institutional Population	Total Labor Force	Total Employed	Employed W Disability	Employed w/o Disability	Total Unemployed	Unemployed w/Disability	Unemployed w/o Disability
East	1,425,612	1,033,176	965,444	63,561	901,883	67,732	10,399	57,333
Middle	1,648,239	1,263,412	1,194,684	71,327	1,123,357	68,728	9,201	59,527
West	941,059	698,612	639,889	36,176	603,713	58,723	6,984	51,739
Tennessee	4,014,910	2,995,200	2,800,017	171,064	2,628,953	195,183	26,584	168,599

Source: U.S. Census Bureau, 2013 2017 American Community Survey 5-Year Estimates

**Table 11: TN Disability Status of Those Not in the Labor Force, 2017**

Area	Civilian Non-Institutional Population	Total Not In Labor Force	Not in Labor Force w/Disability	Not In Labor Force w/o Disability	% w/Disability	% w/o Disability
East	1,425,612	392,436	145,284	247,152	37.00%	63.00%
Middle	1,648,239	384,827	122,002	262,825	31.70%	68.30%
West	941,059	242,447	80,753	161,694	33.30%	66.70%
Tennessee	4,014,910	1,019,710	348,039	671,671	34.10%	65.90%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

### Challenges: Substantial Barriers to Employment

WIOA included a renewed focus on those with substantial barriers to employment (SBEs), with categories specifically defined in the WIOA guidelines. Estimates of the number of these individuals by Local Workforce Development Areas (LWDAs) in Tennessee were produced from a number of sources, including the following:

- U.S. Census Bureau
- U.S. Department of Labor, Bureau of Labor Statistics (BLS)
- Tennessee Department of Correction
- Tennessee Department of Human Services
- Tennessee Department of Children's Services
- Tennessee Department of Education

- Tennessee Department of Mental Health and Substance Abuse Services

Numbers of individuals with barriers to employment by LWDA in the following categories are included:

- Native American Indians or Alaskan Natives Alone
- Population Ages 15-19 and 20-24
- Older individuals- more than 55 years old
- Low-income individuals - number of people in poverty
- Individuals with disabilities
- Single parent families
- Probationers and parolees
- Community Corrections
- Mental Health Court Statistics
- Limited English Speaking Individuals
- Foster Care Services- Youth Aged Out
- Clients in Recovery Courts
- In-school youth experiencing homelessness
- TANF 18 months from ending eligibility

**Table 12: TN Substantial Barriers to Employment**

New LWDA Area	Number Of American Indians or Alaskan Natives alone	Population	Population	Population	Number Below Poverty	Number With Disability	Number of Single Parent Families
		Ages 15-19	Ages 20-24	Ages 55+			
<b>East</b>							
<b>East Tennessee (2)</b>	3,719	76,106	85,088	377,446	180,730	107,067	36,591
<b>Northeast Tennessee (1)</b>	1,301	30,444	32,810	171,547	83,919	55,710	17,271
<b>Southeast Tennessee</b>							

New LWDA Area	Number Of American Indians or Alaskan Natives alone	Population	Population	Population	Number Below Poverty	Number With Disability	Number of Single Parent Families
		Ages 15-19	Ages 20-24	Ages 55+			
(4)	1,274	39,655	41,575	196,728	95,354	56,331	19,862
<b>Middle</b>							
<b>Northern Middle Tennessee (6)</b>	5,863	121,482	137,344	446,987	215,424	127,623	64,553
<b>Southern Middle Tennessee (5)</b>	1,191	26,669	26,375	132,847	61,964	40,834	14,910
<b>Upper Cumberland (3)</b>	1,035	21,366	22,884	115,897	61,223	34,073	11,249
<b>West</b>							
<b>Greater Memphis (9)</b>	2,145	72,706	76,106	267,975	192,753	75,840	50,990
<b>Northwest Tennessee (8)</b>	821	16,825	16,461	80,194	45,943	25,844	9,792
<b>Southwest Tennessee (7)</b>	219	17,011	16,609	77,379	43,084	22,229	9,877
<b>Total</b>	17,568	422,264	455,252	1,867,000	980,394	545,687	235,095

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

Tennessee continues on the path of positive employment growth and increasing population with historically low unemployment rates and some increases in educational attainment and wages. Information on the significant numbers of individuals who face substantial barriers to employment as identified by the Workforce Innovation and Opportunity Act will provide the newly created Local Workforce Development Areas information for strategic planning on those they have the potential to serve.

**Table 13: TN Substantial Barriers to Employment (Cont.)**

LWDA Title	Probationers and Parolees	Community Corrections	Mental Health Court Statistics (FY 2018)	Limited English Speaking	*Foster Care Services - Youth Aged Out	Clients In Recovery Courts (2018)	In School Youth Experiencing Homelessness in 2018	TANF 18 Months From Ending Eligibility Total 2017
<b>East</b>								
<b>Northeast</b>								
<b>Tennessee</b>	5,878	551	13	727	64	62	1,527	162
<b>East Tennessee</b>	13,910	1,025		5,824	208	341	2,281	349
<b>Southeast Tennessee</b>	7,053	343		3,055	80	114	1,982	235
<b>Middle</b>								
<b>Upper Cumberland</b>	4,830	362		1,354	82	234	1,487	86
<b>Southern Middle Tennessee</b>	5,373	540	28	1,492	93	148	334	134
<b>Northern Middle Tennessee</b>	1,439	1,439	38	18,016	203	586	7,340	506
<b>West</b>								
<b>Southwest Tennessee</b>	2,869	800		479	33	54	588	151
<b>Northwest Tennessee</b>	2,889	584		374	38	98	188	117
<b>Greater Memphis</b>	13,880	717	34	6,949	160	323	2,631	1,011
<b>Total</b>	78,658	6,361	113	38,270	961	1,960	18,358	2,7

**Table 13A: TN Substantial Barriers to Employment (Cont.)**

<b>LWDA Title</b>	<b>Number of Veterans in 2018</b>	<b>Number of Veterans in 2019</b>
<b>East</b>	<b>174,956</b>	<b>172,403</b>
<i>East Tennessee</i>	<i>91,070</i>	<i>89,848</i>
<i>Northeast Tennessee</i>	<i>40,016</i>	<i>39,483</i>
<i>Southeast Tennessee</i>	<i>43,870</i>	<i>43,072</i>
<b>Middle</b>	<b>193,448</b>	<b>193,035</b>
<i>Northern Middle Tennessee</i>	<i>136,140</i>	<i>136,227</i>
<i>Southern Middle Tennessee</i>	<i>31,665</i>	<i>31,393</i>
<i>Upper Cumberland</i>	<i>25,643</i>	<i>25,415</i>
<b>West</b>	<b>97,270</b>	<b>95,256</b>
<i>Greater Memphis</i>	<i>61,964</i>	<i>60,467</i>
<i>Northwest Tennessee</i>	<i>18,538</i>	<i>18,287</i>
<i>Southwest Tennessee</i>	<i>16,768</i>	<i>16,502</i>
<b>Total</b>	<b>465,674</b>	<b>460,694</b>

**Table 13B: TN Substantial Barriers to Employment (Cont.)**

<b>TANF Clients Exhausting in 24 Months – Region</b>	<b>LWDA</b>	<b>Totals</b>
<b>East Region</b>		<b>509</b>
	<i>East Tennessee</i>	<i>209</i>
	<i>Northeast TN</i>	<i>134</i>
	<i>Southeast TN</i>	<i>166</i>
<b>Middle Region</b>		<b>432</b>
	<i>Northern Mid. TN</i>	<i>293</i>
	<i>Southern Mid. TN</i>	<i>85</i>
	<i>Upper Cumberland</i>	<i>54</i>
<b>West Region</b>		<b>739</b>
	<i>Northwest TN</i>	<i>85</i>
	<i>Southwest TN</i>	<i>118</i>
	<i>Greater Memphis</i>	<i>536</i>

<b>TANF Clients Exhausting in 24 Months – Region</b>	<b>LWDA</b>	<b>Totals</b>
<b>Total TN</b>		1680

\* Counties of commitment, not residence.

Sources: Probationers and parolees, Community Corrections: Adam Dawson, Community Supervision Division, TN Department of Correction. Mental Health Court and Recovery Court Statistics: Liz Ledbetter, Recovery Court Administrator, TN Department of Mental Health and Substance Abuse Services: Limited English Speaking: U.S. Census Bureau, American Community Survey, 2017. Foster Care Services: Dave Aguzzi, Office of Independent Living, TN Department of Children’s Services, In School Youth Experiencing Homelessness: Hebeh Hindich (2017), Josh Carlson (2018), Data Management Division, TN Department of Education TANF 18 Months for Ending Eligibility: Lakecia Peterson (2017), Tiffany D. Pinson (2018), Division of Family Assistance and Child Support, TN Department of Human Services; U.S. Department of Veterans Affairs (<https://www.va.gov/vetdata/veteran-population.asp>).

The Steering Clear program implemented in 2017 by the Davidson County District Attorney and Sheriff’s Department is credited to have diverted over 5,000 charges related to driver’s license violations out of Nashville’s court rooms in the past year.<sup>1</sup>

[1]Tamburin, A. (2019, September 6). Nashville police records on withdrawal driving charges will be cleared after expungement order. Tennessean (<https://www.tennessean.com/story/news/2019/09/06/nashville-steering-clear-program-police-records-cleared-weekly/2226158001/>)

**Table 14: TN 2018 Annual Average of Those Unemployed for 27 or More Consecutive Weeks**

<b>Group Identified</b>	<b>Number of Workers Reported</b>
<b>All Races</b>	14,875
<b>White</b>	11,225
<b>Black</b>	3,000
<b>Hispanic</b>	700
<b>Age 16-19</b>	1,050
<b>Age 20+</b>	13,800
<b>Male, 16+</b>	6,150
<b>Female, 16+</b>	8,725

Source: TN Department of Labor and Workforce Development, Local Area Unemployment Statistics, Current Population Survey

ii. Labor Market Trends

The Tennessee economy continued its growth in 2018, with nonagricultural employment increasing from 3,011,300 to 3,060,300. The average number of employing establishments grew more rapidly than in 2017, the state labor force expanded by 1.7 percent, and state unemployment rates continued their decline to 3.5 percent. Per capita income advanced almost as quickly as the U.S. in 2016-2017 as average wages rose by 3.6 percent and poverty rates declined to 16.7 percent. The short-term job outlook is for annual average employment growth of at least 1.2 percent through the third quarter of 2020, with expected total openings of 813,110 over the two year period. From 2016 to 2017, non-fatal injuries and illnesses on the job were also reduced.

Much of the following narrative can be found in Tennessee's Economy: 2018 Reference Guide, published in September 2018 and available at <https://www.tn.gov/workforce/general-resources/major-publications0/major-publications-redirect/public-reports-redirect/tennessees-economy.html>. Data sources are listed below each table.

### **Employment**

Nonagricultural employment increased by 1.6 percent from 2017 to 2018, slightly faster than in the previous year. The result was 49,000 new jobs created in the state from 2017 to 2018. All metropolitan statistical areas increased in employment except Cleveland.

### **Employers**

The average number of establishments is increased by 3.1 percent over the year. Total payroll increased to \$150.2 billion in 2018, nearly a five percent nominal increase over 2017. 63 counties had a net increase in employing establishments in 2018, seven fewer than in 2017.

### **Labor Force and Demographics**

Total population increased a little slower from 2017 to 2018 (.91 percent) than in the previous year. Even as the labor force increased to 3,244,921 in 2018, the number of unemployed decreased by 6,600 to an annual average of 113,300. The average unemployment rate dropped from 3.8 percent in 2017 to 3.5 percent in 2018.

### **Wages And Income (And Poverty)**

The Tennessee average annual wage is increased by 3.3 percent in 2017-2018. The median wage, with half of the employees earning more and half less, improved over the year by 3.0 percent, bringing the state median wage to \$34,890. Production wages increased from \$19.40/hour in 2017 to \$21.47/hour in 2018. Per capita, personal income was \$45,517 (2017), while the rate of poverty decreased to 16.7 percent.

### **Job Outlook**

One measure of the job outlook is the number of unemployed individuals compared to the number of jobs posted monthly on the job seeker website jobs4tn.gov. From June 2017 to June 2018, the number of unemployed remained less than the number of job postings, as the state remained a jobseekers' market. Job growth through 2020 was expected to be at least 1.2 percent annually.

### **Safety On The Job**

Safety on the job was stable from 2016 to 2017, maintaining 3.0 nonfatal injuries and illnesses per 100 full-time equivalent workers.

### **Detailed Industry Analysis**

Twenty industries comprise more than two of every three jobs in Tennessee. The top five industries include food services and drinking places, educational services, administrative and support services, ambulatory health services (outpatient), and hospitals. More people are now employed in outpatient healthcare settings (154,069) than in hospitals (146,409). These industries are also the top five in terms of employment in the Northeast, Southeast, and Southwest LWDAs. However, in the East and Northern Middle LWDAs, professional, scientific, and technical industries rank in the top five. Due to their concentration of hospitals, in both the Northern Middle and Greater Memphis areas, hospital employment outranks employment in the ambulatory care industries.

Due to their proximity to major auto manufacturing facilities, in the Middle Region the Upper Cumberland and Southern Middle LWDAs rank the transportation equipment manufacturing industries in their top five in employment. In the West, however, there are differences; in Northwest, food manufacturing and nursing and residential facilities are in the top five, while Greater Memphis includes couriers and messengers.

### **Detailed Occupational Analysis**

The service-providing sector is expected to grow just slightly faster than the goods producing sector, due to construction's expected growth of more than two percent annually and manufacturing's expected growth of 0.7 percent. Construction is expected to create more than 5,500 jobs during the 2018-2020 projection period; related to construction are the architecture and engineering occupations, including many STEM occupations.

More rapid growth in the professional and business services, financial activities, and leisure and hospitality industries will boost employment in the computer and mathematical and business and financial occupations. Healthcare support is expected to be the second fastest-growing group, and healthcare practitioners' employment will grow faster than all occupations on average. The occupations with the most openings, paying more than \$28,000 on average, include office and administrative support and production occupations. The top four critical skills in terms of growth are speaking, active listening, social perceptiveness, and reading comprehension.

Information on Middle-Skill occupations (those requiring less than a four-year degree) that are in demand, their 2018 annual average wages, and their current supply/demand outlook by LWDA is in the table LWDA Middle Skill Occupations in Demand and their Annual Average Openings. If listed occupations have certifications aligned with Tennessee high school career and technical education programs, require a license, or have apprenticeship training in the state, a second table lists these occupational titles and employer requirements or preferences.

Additional information on industries and occupations can be found in section (a) (1) (A) (i), *Economic Analysis, Existing Demand Industry Sectors and Occupations*.

### iii. Education and Skill Levels of the Workforce

#### Educational Attainment

Detailed information on educational attainment by category is shown in the table included. At the state level, the per-centages of the population 25 years old and over who have only been educated through the 9th grade level, those attending high school but not receiving a diploma, those only completing a high school program, those achieving some college education, or a graduate degree or professional degree have decreased slightly, while the percentag-es of those achieving an associate's degree or a bachelor's degree have increased. The low-est rate of higher educational attainment (attainment of some college or more for those 25 years of age or higher) continues to be in the East, with a rate of

51.4 percent compared to the state rate of 53.9 percent. However, all areas gained slightly, with the Middle Region gaining the most at 0.8 percent and achieving a rate of more than 56 percent.

The state percentage of the population 25 years and over in 2017 who had less than a 9<sup>th</sup> grade education, or had a 9<sup>th</sup> to 12<sup>th</sup> grade education with no diploma, was 13.5 percent, or 603,534 individuals. In the Middle Region, 12.3 percent of the population, or 220,893 individuals; in the East Region, 14.4 percent, or 236,919 individuals; and in the West Region 14.1 percent, or 145,712 individuals, had less than a high school degree. Improving literacy continues to be a concern.

This level of education puts these individuals at a disadvantage in the labor market where jobs requiring less than a high school degree do not pay a living wage.

**Table 15: TN Educational Attainment by Area, 2017**

<b>Educational Attainment</b>	<b>East</b>	<b>%</b>	<b>Middle</b>	<b>%</b>	<b>West</b>	<b>%</b>	<b>State</b>	<b>%</b>
<b>Population 25 years and over</b>	1,647,817	X	1,794,087	X	1,036,546	X	4,478,450	X
<b>Less than 9th grade</b>	93,204	5.70%	84,336	4.70%	50,639	4.90%	228,179	5.10%
<b>9th to 12th grade, no diploma</b>	143,715	8.70%	136,557	7.60%	95,073	9.20%	375,345	8.40%
<b>High school graduate (includes equivalency)</b>	564,202	34.20%	558,811	31.10%	338,351	32.60%	1,461,364	32.60%
<b>Some college, no degree</b>	335,850	20.40%	369,069	20.60%	229,428	22.10%	934,347	20.90%
<b>Associate's degree</b>	122,764	7.50%	125,449	7.00%	64,229	6.20%	312,442	7.00%
<b>Bachelor's degree</b>	240,297	14.60%	338,443	18.90%	159,873	15.40%	738,613	16.50%
<b>Graduate or professional degree</b>	147,785	9.00%	181,422	10.10%	98,953	9.50%	428,160	9.60%

Source: U.S. Census Bureau, 2013 2017 American Community Survey 5-Year Estimates

#### iv. Skill Gaps

##### **Middle Skill In-Demand Occupations and Skills Gaps**

The above table of middle skill occupations in demand uses a variety of criteria to identify those occupations for which there are skill gaps in the LWDAs and which in general require less than a bachelor's degree. The following skill shortage areas are most notable; the number in parentheses is the number of LWDAs which have the shortages:

##### Computer Skills:

- Computer user support specialists (4)

##### Manufacturing and Skilled Trades:

- Electrical and electronic engineering technicians (4)
- Maintenance workers, machinery (4)

- Heating, air conditioning, and refrigeration mechanics and installers (5)

Healthcare:

- Respiratory therapists (4)
- Registered nurses (7)
- Radiologic technologists (5)
- LPNs (9)
- Physical therapist assistants (7)
- Diagnostic medical sonographers (4)

Business:

- First-line supervisors of office and administrative support workers (5)

Government:

- Police and sheriff's patrol officers (4)

Transportation:

- Bus, truck, and diesel engine mechanics (6)
- Mobile heavy equipment mechanics (4)
- Heavy and tractor-trailer truck drivers (2), >1,000 demands in each LWDA

Critical skills for employers are listed above in section iii. For the ten skills listed, the largest employment increase is for employment requiring critical thinking (15.69%). This again emphasizes the need for the Tennessee workforce to increase its educational attainment at the bachelor's degree level and in programs emphasizing this skill. The other two skills with the largest increases are service orientation (14.46 %) and social perceptiveness (13.76%). These "soft skills" will be important to include in training programs, as well, as important skills in a service economy. Monitoring skills (13.35%) require math skills; the math literacy at the high school level in Tennessee needs to increase. Reading comprehension (12.92%) is also critical and an important skill for Tennessee students and those in the workforce need to improve and which is important in obtaining a high school diploma or GED.

## 2. Workforce Development, Education and Training Activities Analysis

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of—

## A. The State's Workforce Development Activities

Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required<sup>6</sup> and optional one-stop delivery system partners.<sup>7</sup>

[6] Required one-stop partners: In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (Perkins), Community Services Block Grant, Indian and Native American programs, HUD Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs program, Senior Community Service Employment program, Temporary Assistance for Needy Families (TANF) (unless the Governor determines TANF will not be a required partner), Trade Adjustment Assistance programs, Unemployment Compensation programs, and YouthBuild.

[7] Workforce development activities may include a wide variety of programs and partners, including educational institutions, faith- and community-based organizations, and human services.

## B. The Strengths and Weaknesses of Workforce Development Activities

Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.

## C. State Workforce Development Capacity

Provide an analysis of the capacity of State entities to provide the workforce development activities identified in (A), above.

### *The State's Workforce Development Activities*

The analysis of Tennessee's workforce development activities has been informed by a formal assessment activity launched in early 2019. This assessment activity reviewed different aspects of the state's workforce system, including an analysis of the system's governance and operational performance since the realignment of the local workforce boards in 2018.

Tennessee is in an extraordinary position as it relates to WIOA program administration, alignment, and partnership. The Tennessee Department of Labor & Workforce Development (TDLWD) is charged with being the lead agency in the development of a new and comprehensive Workforce Development System to include Economic & Workforce Development, Department of Correction, Department of Human Services, Department of Education, K-12 Education and the Community College System as recommended by the State of Tennessee Workforce Board directed by the Governor. TDLWD is tasked with leading, aligning and coordinating a comprehensive workforce system that allows for maximum delivery of programs and services, establishment of USDOL apprenticeships and re-entry programs and braided funding for all programs within its responsibility; including the Federal WIOA program, State Workforce Development Board, Chief Local Elected Officials and other entities.

Currently, all the WIOA (Title I), Adult Education (Title II), Wagner Peyser (Title III) core programs are administered by the TDLWD, as well as Trade Adjustment Assistance, Senior Community Services Employment Program (SCSEP), Reemployment Services and Eligibility Assessment (RESEA), Veterans' Outreach and Employment programs, and Unemployment Insurance. The Carl D. Perkins,

postsecondary workforce training, program is administered by the Tennessee Department of Education (TDOE), with the Vocational Rehabilitation (Title IV) and Temporary Assistance for Needy Families (TANF) programs under the administrative umbrella of the Tennessee Department of Human Services. Having the core WIOA programs and other required partners clustered within a few agencies – in addition to the TDLWD being charged as the lead agency for developing the workforce system – makes it easier to streamline planning and policy alignment and promote robust referral processes at the State and local levels.

TANF offers seven (7) categories of work activities that can count toward the TANF work participation rate and assist the customer in becoming self-sufficient. The work activities are categorized by core and non-core activities.

**Core Activities:** An activity which lead most quickly to self-sufficiency for a customer. A customer is required to participate in at least twenty (20) hours of a core activity weekly.

- **Job Readiness Assistance and Job Search** – These job-related activities are to prepare the customer for employment so that he or she can be competitive and succeed in the labor market.
- **Work Experience** – Work Experience is an unpaid work activity that allows the customer an opportunity to acquire the general skills, training, and knowledge, and work experience necessary to obtain employment.
- **Community Service Programs** – Unpaid work activity that the customer performs work for the direct benefit of the community under public or non-profit organizations. This activity is for the customer who needs to increase their employability by improving interpersonal skills, job retention skills, stress management, and job problem solving by learning to attain a balance between job and personal responsibilities.
- **Vocational Educational Training** – Organized and/or accredited educational or vocational training programs directly related to the customers preparation of employment in current or emerging occupations that require training other than a baccalaureate or advanced degree. These training programs are limited to activities providing knowledge and skills to perform a specific trade, occupation, or other vocation.
- **Unsubsidized Employment** – The customer is regularly scheduled to work with wages for a set number of hours each week. Full time is considered working thirty (30) hours or per week and part time employment is working less than thirty (30) hours per week.

**Non- Core Activities:** Activities that a customer can be assigned if additional hours are needed to meet the minimum work requirement after the required core activity hours are met or when all opportunities to participate in a countable core activity have been exhausted or not available.

- **Adult Education**– Formal educational program for adults who are over the age of seventeen (17) lacking a high school diploma. Basic and remedial education and English as a Second Language may be included in this activity.
- **Job Skills Training Directly Related to Employment** – Any activity that is reasonably linked to a customer’s employability and are typically short-term skills training programs, such as office skills, basic computer literacy, drivers training, clerical skills, client services, and keyboarding. Post-secondary education that leads to a bachelor’s or advanced degree may count as job skills training.

The Tennessee Department Human Services (TDHS) – Vocational Rehabilitation (VR) Services Program helps individuals to identify competitive and integrated employment opportunities available to them by offering a variety of services, including:

- Pre-Employment Transition Services (Pre-ETS)
- Examples: Job exploration counseling, work-based learning experiences, counseling on enrollment in post-secondary opportunities, workplace readiness training, and instruction in self-advocacy
- Training Services
- Examples: Graduate school, four-year college or university, junior or community college, occupational or vocational training, on-the-job training, and apprenticeship training
- Career Services
- Examples: Assessment, counseling and guidance, job search and placement assistance, short-term job supports, supported employment services, job retention and post-employment services

VR also offers additional, support services including transportation, interpreter services, personal assistance services, and access to assistive technology devices.

The VR Services Program operates 17 Community Tennessee Rehabilitation Centers (CTRCs) across the state. These centers are currently being assessed to determine how they should be structured moving forward to best meet the needs of the individuals that the VR program serves and the communities where they are located.

The VR Services Program also operates the Tennessee Rehabilitation Center (TRC) – Smyrna, a comprehensive vocational rehabilitation training center. On July 22, 2019, the TRC - Smyrna transitioned from a program-based model to a new Career and Technical Education (CTE) design to enhance the overall service delivery process and better align the Center with the WIOA Primary Indicators of Performance in the areas of Credentialing and Skills Gains.

### *The Strengths and Weaknesses of Workforce Development Activities*

#### **Analysis of Strengths of the Workforce Development Activities**

The realignment of the LWDAs in 2018 strengthened the workforce system to further align the education, workforce, and economic development sectors. Since the realignment in 2018, additional statewide agencies have aligned to the economic job base camps, established under our previous Governor, which provides more opportunity to regionalize economic and workforce development activities and optimize opportunities for sharing and leveraging resources in the areas of education and workforce development partnerships. This realignment was a pivotal strategy for implementing sector partnerships and building a foundation for strengthening the workforce system to engage partners.

Although the third party assessment focused more on the need for recommended improvements to the workforce system, there were several areas of leading practices in the state that focused on alignment, administration, contract management and strong policy adherence, to include One-Stop Operator and Career Service Provider procurement. A second phase of transformation will occur

early 2020 and will focus on strengthening organizational structures, improved strategic planning, local board development, process design and deployment, and additional technology improvements.

### **Analysis of the Weaknesses of the Workforce Development Activities**

Based on the review of the state's workforce system, nine improvement opportunities were identified during the assessment activity. The recommended improvements will serve as the framework for a comprehensive training effort to begin in early 2020.

1. **Strategy** - We recommend defining the timeline for creating the Local and Regional Plans at least three months in advance. This will allow for areas to obtain input from all key stakeholders while still allowing areas to continue focusing on serving the people of Tennessee. We also recommend assigning responsibility for driving technological and other innovative enhancements at each area.
2. **Roles and Responsibilities** - We recommend the State provide Local Workforce Development Areas (LWDAs) with High-Performing Team guidance and activities. We recommend providing reference guides for Chief Local Elected Officers and Board members to help them understand the State's vision of the role. Additionally, we recommend the State provide guidance to the Executive Directors and Regional Directors on how to best work together, and comparing the optimal RACI to RACIs from the individual sprint reports to identify gaps in knowledge and understanding.
3. **Organizational Structure** - We recommend that the State analyze the various organizational structures related to the LWDA administrative entities. We also recommend procuring for the one-stop operators (OSO) and career service providers (CSP) to ensure requirements and expectations are clearly documented and understood upfront.
4. **Local board Performance Management** - We recommend operationalizing the strategic plan by developing metrics from the plan to be measured through this process. We also recommend utilizing a dashboard approach to presenting to the Board and creating a reference document including the definition of all key performance indicators/key metrics so it is clear to those trying to interpret what the data being presented means.
5. **Monitoring** - We recommend the State update their monitoring policy to include minimum requirements for LWDAs. Monitoring performed should then align with those policies.
6. **Procurement** - Leading practices such as blind scoring should be adopted by all nine areas. We also recommend the OSO and the CSP be procured separately, or clearly documenting expectations of each contracted provider in that RFP.
7. **Communication and Training** - The State should consider developing a Customer Experience Strategy and Road Map to better align activities to customer needs. We also recommend the State provide LWDAs further guidance to better understand the appearance of conflict of interest provision in the firewall to ensure compliance with the firewall but also to minimize inefficiencies in communication.
8. **Technology** - Recommendations to VOS include defining a system "champion" available to answer questions, developing report templates to be used across the state and providing a report key to the areas. Additionally, we recommend reviewing the feasibility of integrating virtual one-stop system with the grants management system (Grants4TN) and considering the implementation of chat bots to assist customers with their initial data entry.
9. **Automation and Innovation** - We have identified several opportunities throughout the engagement. We believe there is a potential use case for each of these as they will increase

the quality of the specific task and free up resources to focus on better serving the people of Tennessee. The State should consider working through “quick-win” automation opportunities to show return on investment for further innovation.

**Strengths:** The TANF work activities provide an individual with an opportunity to acquire the general skills training, knowledge, and work necessary to obtain employment. These activities are identified based on an individual career placement assessment which captures the customer’s goals and skillset.

**Weakness:** The TANF requirements of the work participation rate dictate time limits are imposed on some of the core work activities. This time limitation can interfere with the development of an effective plan to address barriers to employment that some families face, as well as, influence the effectiveness of training and education, even where the evidence shows stronger employment outcomes for those who complete such programs.

*The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program conducted a comprehensive statewide needs assessment in 2019, surveying customers/caregivers, stakeholders, community rehabilitation providers (CRPs), VR staff, and WIOA partners about the services that VR offers. Overall, information collected in the needs assessment revealed that individuals who interact with the VR program believe that VR provides beneficial and much-needed services to Tennesseans who need it. However, the same information also illustrated that the program has opportunities to improve and strengthen service delivery, internal and external communication, and efforts to train and retain VR’s most important asset – the staff that work day in and day out to help connect Tennesseans with disabilities to competitive and integrated employment opportunities.*

#### *State Workforce Development Capacity*

Tennessee is experiencing growth in new jobs which demands a highly functioning workforce system that provides excellence in service delivery by all partners connected with the American Job Centers. The signed memorandums of understanding that outline services to be provided by respective partners, as well as funding agreements, allow for the Governor’s priorities to be accomplished through leveraging of resources from multiple sources. The priorities to be accomplished include:

1. Education and Workforce Development;
2. Transparent and Efficient Government;
3. Healthier Tennessee;
4. Jobs and Rural Economic Development; and
5. Public Safety/Criminal Justice Reform

As a result of realignment in 2018, the nine (9) Local Workforce Development Boards (LWDBs), contracted one-stop operators, workforce service providers, and community partners are better able to achieve the aforementioned Governor’s priorities. The State Workforce Development Board provides guidance that aligns workforce development activities, and holds LWDB’s accountable to meet the Governor’s priorities by establishing rigorous strategic planning requirements coupled with common performance accountability measures, including key performance indicators for assisting those hardest to serve.

Through asset mapping, new non-traditional partners – including non-profit agencies – will continually be identified to integrate their services within the workforce system structure. Some of these agencies will be assessed to determine interest in becoming access points by referring and assisting clients to

connect to the public workforce system. This structure will be evaluated by working through our partner network of training providers, libraries, community and faith-based organizations and others to provide training and limited support to expand our state-wide networking capabilities. The role LWDBs play in driving this model will be essential to building an affordable and highly efficient workforce system in Tennessee. However, the establishment of new non-traditional statewide partners will both empower the work of the LWDBs by offering additional service capacity and opportunities for innovation.

TDHS TANF program partners with various partners to deliver most of the core and non-core activities identified in section (A) above. TANF also partners with other entities who provide services in addressing barriers to employment such as, providing short term counseling, substance abuse assistance, and other services as needed.

The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program operates in all three Grand Regions. The program is divided among nine geographic regions and two statewide sensory divisions. In July 2019, the VR regions were restructured to align with the state's nine workforce development areas including the Departments of Labor and Workforce Development and Economic and Community Development to provide consistent community participation and support efficient operations. This restructuring allows VR regions to align with the state landscape, state partners, provide consistent community participation, and support efficient operations.

*Tennessee's Workforce Development system is a highly interdependent and disparate network of state agencies and state organizations [Tennessee Board of Regents (TBR), Tennessee Higher Education Commission (THEC), Tennessee Department of Economic & Community Development (TNECD), Tennessee Department of Corrections (TDOC), Tennessee Department of Human Services (DHS), Tennessee Department of Education (DOE), Tennessee Department of Labor & Workforce Development (TLWD), and others]. And while the system boasts individual sources of workforce excellence, the multiple agencies and organizations charged with executing workforce development struggle to manage and innovate in a comprehensive and cohesive manner.*

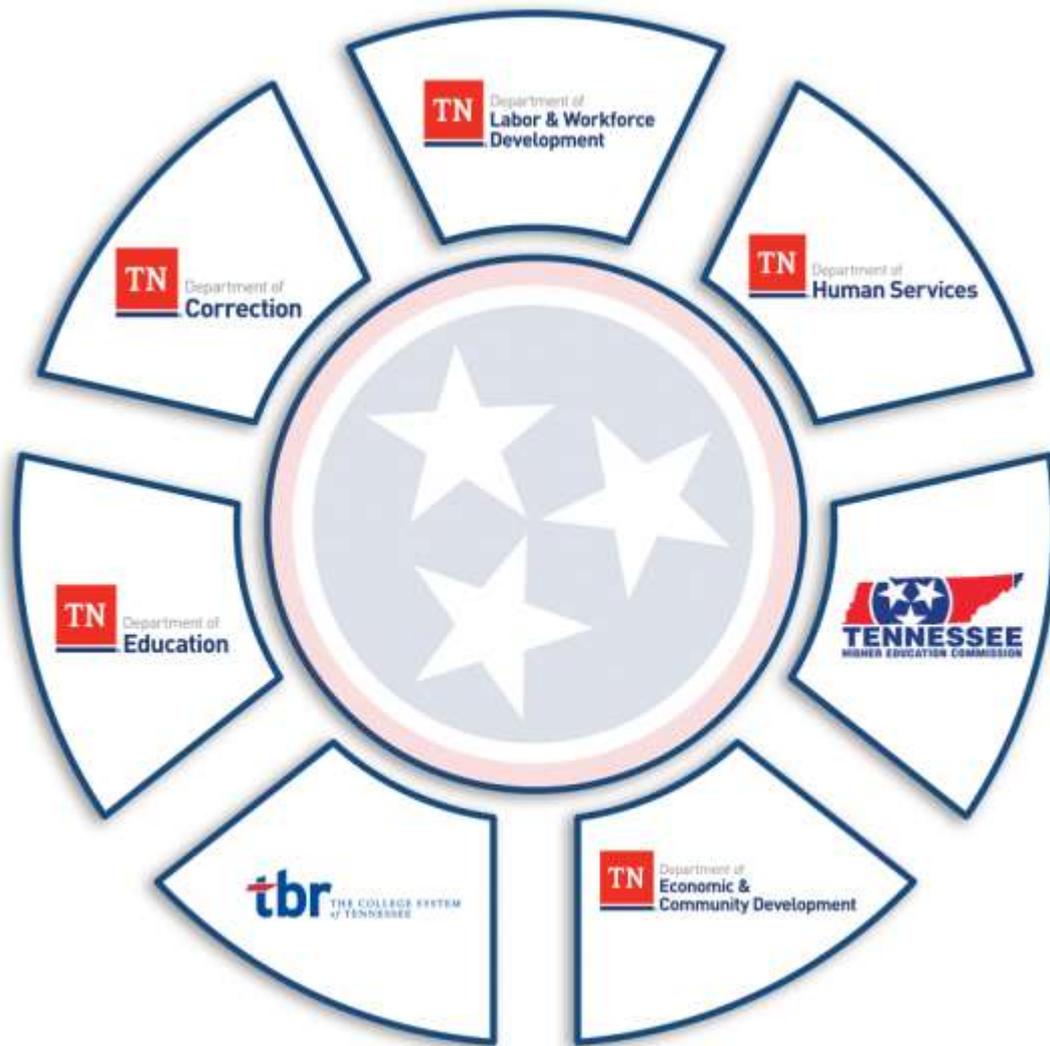


Figure 1: The Tennessee Workforce Development System

*Execution of a comprehensive and cohesive workforce development strategy has to account for the inherent interdependency through a formalized strategy of shared projects, shared processes, and shared metrics under centralized leadership and/or consolidation of functions. As a result, the Tennessee Workforce Development System (TNWDS) Steering Team has been formed. The team consists of members from TBR, THEC, TNECD, TDOC, DHS, & DOE and is led by TLWD. The team is charged with:*

1. *Aligning Strategy*
2. *Implementing Initiatives, and*
3. *Monitoring Progress for Tennessee's workforce development system.*

*The team will receive support and guidance from a broad-based Advisory Committee (TBD).*

*The Workforce Development strategy in this document is a product of this collaborative execution model. The Tennessee Workforce Development System*

*On the whole, the four major strategic goals for The Tennessee Workforce Development System are:*

- *Clear Connection to Current Industry/Employers*
- *Clear Pipeline Development Infrastructure*
- *Clear Integration with Economic Development*
- *Outcome Visibility - Clear Data/Reporting and Predictive Analytics*

*Components of Clear Connection to Current Industry/Employers (demand side) include:*

- *Scalable Public/Private Partnerships*
- *Responsive Incumbent Training Programs*
- *Responsive Talent Acquisition Programs*

*Components of Clear Pipeline Development Infrastructure (supply side) include:*

- *Pathway Processes (training/education to work)*
- - *K-12*
  - *Adult Education*
  - *Re-Entry*
  - *Dislocated Worker/Re-Employment (Unemployment Insurance/Workers Comp)*
  - *Military Transition*
  - *Post-Secondary*

*Components of Clear Integration with Economic Development (investment) include:*

- *Cross Agency Incentive Process*
- *Cross Agency Project Management Process*

*Components of Outcome Visibility (research and metrics) include:*

- *Cross Agency Metrics*
- *Increased Leveraging of P20 Data Set for Metric Set and Analytics, specifically:*
- - *Correlations/Comparisons for success variable sets relative to workforce development initiatives and interventions.*

Under this strategic framework, and accounting for its operational components, the TNWDS Steering Team will execute the following workforce development strategy as part of a collective 4-year plan. For reference, an overview of the strategic plan is included in figure 2 and the execution framework in figure 3.



Figure 2: TN Workforce Development System Strategy - Goals & Objectives

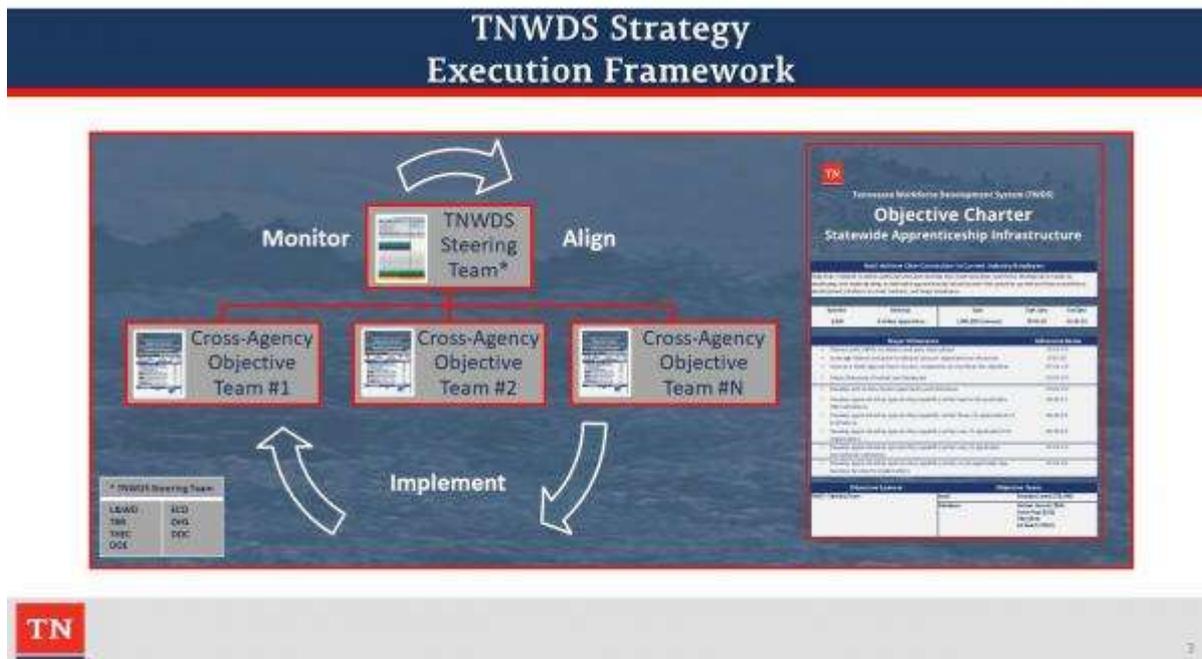


Figure 3: TNWDS Strategy – Execution Framework

*The Workforce System Vision is to increase the competitive position of Tennessee business through the development of a highly skilled workforce.*

*Under the guidance of the State Workforce Board, clarified in their recommendation to Governor Bill Lee, the Tennessee Department of Labor & Workforce Development has been charged with developing a plan that seamlessly integrates the service delivery of all programs, in order to improve the success outcomes for the Tennesseans that utilize our programs. This primary goal centers on (1) maximizing the co-enrollment opportunity, (2) developing new intake and referral processes across programs, and (3) designing a reporting system to better analyze performance and outcomes.*

*Connected to the strategy of tighter integration between programs, the State launched a Key Performance Indicator initiative that provides performance and planning resources to the Local Workforce Development Areas (LWDA), across all major programs. The progress thus far has allowed the LWDAs to clearly visualize how all programs can improve performance, as well as conceptualize opportunities to maximize co-enrollment strategies.*

*Within the framework established for the Tennessee Workforce Development System (TNWDS), the underlying goal centers on activating the various programs in more intentional and integrated ways to support the state's vision to bring forward a multi-agency strategy to better serve Tennesseans. In turn, the opportunity to integrate all workforce programs into the TNWDS supports the vision of the State Workforce Board to increase participation and performance in a more integrated manner.*

*The progress thus far has highlighted how a multi-agency strategy, combined with a value for streamlined program integration, can produce new levels of effectiveness and efficiency. The Re-Employment strategy for TNWDS has provided a space for Title I, Title II, Title III, and Title IV programs begin crafting new procedures, that also incorporate resources from higher education and other public programs.*

*The ultimate vision is to increase performance for each program individually by adding service capacity collectively through an integrated approach.*

*With regard to the integration of TANF within the one-stop framework, including collaboration with other agencies, the TNWDS strategy has integrated TANF and other programs from the Tennessee Department of Human Services to ensure that all co-enrollment opportunities will be highly leveraged. Also, under the guidance of the State Workforce Board, the new approach to streamlining intake services and overall service delivery, leveraging the co-enrollment model, will include the resources available through TANF for participants to remove as many barriers to employment as possible.*

### *Analysis of Training Activities*

*Tennessee provides a comprehensive array of training opportunities for WIOA participants. These training activities include cost-effective post-secondary education courses and programs made possible by the state's coverage of tuition for Tennesseans to attend a community or technical college in their area. These benefits to Tennessee's training and education activities is strengthened by the state's goal to improve degree attainment among adults, as well as a funding formula for public post-secondary institutions that is based on student outcomes. Also, in partnership with the Tennessee Higher Education Commission, the state's Eligible Training Provider List offers a variety of course and program options to ensure successful entry in to high-demand and high-wage career pathways.*

*The new approach driven mainly by the Tennessee Workforce Development System, along with the integrated service strategy guided by the State Workforce Board, provide the necessary supports for participants beyond just the covering of tuition and other items related to training and education. With the collaborative multi-agency approach to delivering workforce services, partner agencies and programs have more involvement with the delivery of training activities to ensure performance goals can be met by all partners.*

## **b. State Strategic Vision and Goals**

The Unified or Combined State Plan must include the State's strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency. This must include—

### **1. Vision**

Describe the State's strategic vision for its workforce development system.

### **2. Goals**

Describe the goals for achieving this vision based on the analysis in (a) above of the State's economic conditions, workforce, and workforce development activities. This must include—

(A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment<sup>8</sup> and other populations.<sup>9</sup>

(B) Goals for meeting the skilled workforce needs of employers.

[8] Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible migrant and seasonal farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families Program; single parents (including single pregnant women); and long-term unemployed individuals.

[9] Veterans, unemployed workers, and youth and any other populations identified by the State.

### 3. Performance Goals

Using the tables provided within each Core Program section, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

### 4. Assessment

Describe how the State will assess the overall effectiveness of the workforce development system in the State in relation to the strategic vision and goals stated above in sections (b)(1), (2), and (3) and how it will use the results of this assessment and other feedback to make continuous or quality improvements.

#### 1. Vision

Tennessee's Workforce Development system is a highly interdependent and disparate network of state agencies and state organizations [Tennessee Board of Regents (TBR), Tennessee Higher Education Commission (THEC), Tennessee Department of Economic & Community Development (TNECD), Tennessee Department of Corrections (TDOC), Tennessee Department of Human Services (DHS), Tennessee Department of Education (DOE), Tennessee Department of Labor & Workforce Development (TLWD), and others]. And while the system boasts individual sources of workforce excellence, the multiple agencies and organizations charged with executing workforce development struggle to manage and innovate in a comprehensive and cohesive manner.

Examples include:

1. trouble in executing a timely one-state approach in response to economic development opportunities;
2. the lack of an apprenticeship/pre-apprenticeship effort (behind in the southeast); and
3. failure to fully leverage the State's rich data set

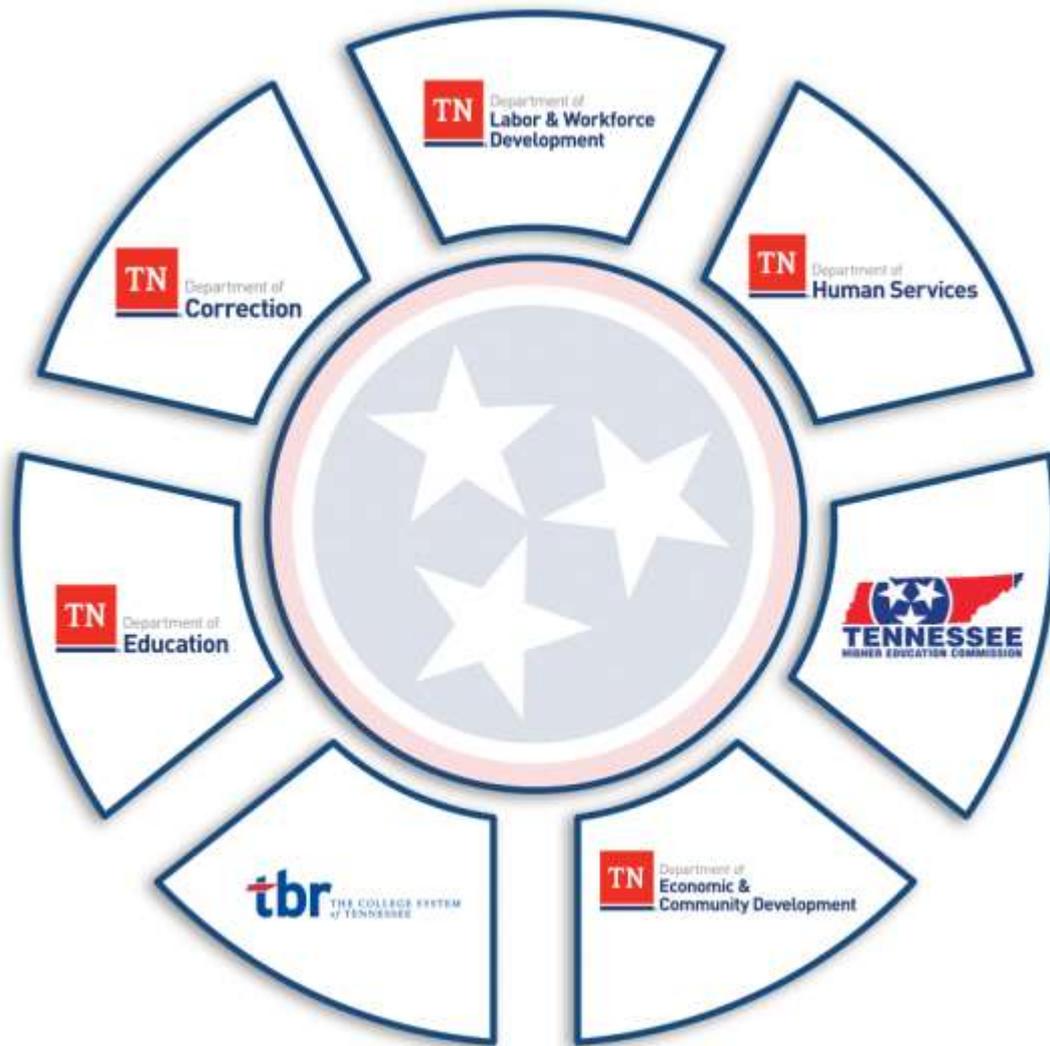


Figure 1: The Tennessee Workforce Development System

Execution of a comprehensive and cohesive workforce development strategy has to account for the inherent interdependency through a formalized strategy of shared projects, shared processes, and shared metrics under centralized leadership and/or consolidation of functions. As a result, the Tennessee Workforce Development System (TNWDS) Steering Team has been formed. The team consists of members from TBR, THEC, TNECD, TDOC, DHS, & DOE and is led by TLWD. The team is charged with:

1. Aligning Strategy
2. Implementing Initiatives, and
3. Monitoring Progress for Tennessee's workforce development system.

The team will receive support and guidance from a broad-based Advisory Committee (TBD).

The Workforce Development strategy in this document is a product of this collaborative execution model.

#### The Tennessee Workforce Development System

On the whole, the four major strategic goals for The Tennessee Workforce Development System are:

- Clear Connection to Current Industry/Employers
- Clear Pipeline Development Infrastructure
- Clear Integration with Economic Development
- Outcome Visibility - Clear Data/Reporting and Predictive Analytics

Components of Clear Connection to Current Industry/Employers (demand side) include:

- Scalable Public/Private Partnerships
- Responsive Incumbent Training Programs
- Responsive Talent Acquisition Programs

Components of Clear Pipeline Development Infrastructure (supply side) include:

- Pathway Processes (training/education to work)
  - K-12
  - Adult Education
  - Re-Entry
  - Dislocated Worker/Re-Employment (Unemployment Insurance/Workers Comp)
  - Military Transition
  - Post-Secondary

Components of Clear Integration with Economic Development (investment) include:

- Cross Agency Incentive Process
- Cross Agency Project Management Process

Components of Outcome Visibility (research and metrics) include:

- Cross Agency Metrics
- Increased Leveraging of P20 Data Set for Metric Set and Analytics, specifically:

- Correlations/Comparisons for success variable sets relative to workforce development initiatives and interventions.

Under this strategic framework, and accounting for its operational components, the TNWDS Steering Team will execute the following workforce development strategy as part of a collective 4-year plan. For reference, an overview of the strategic plan is included in figure 1 and the execution framework in figure 2.

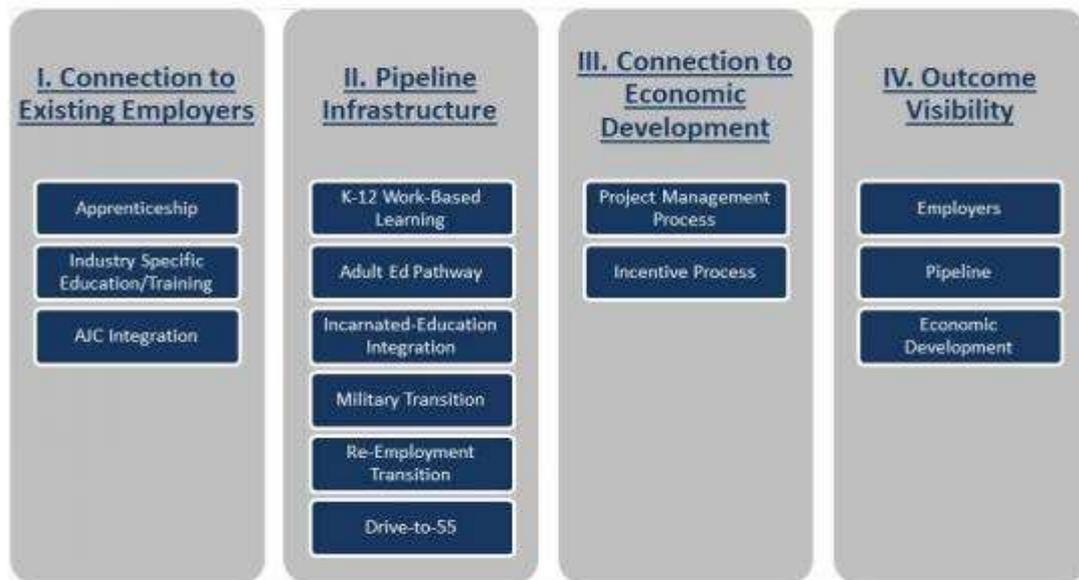
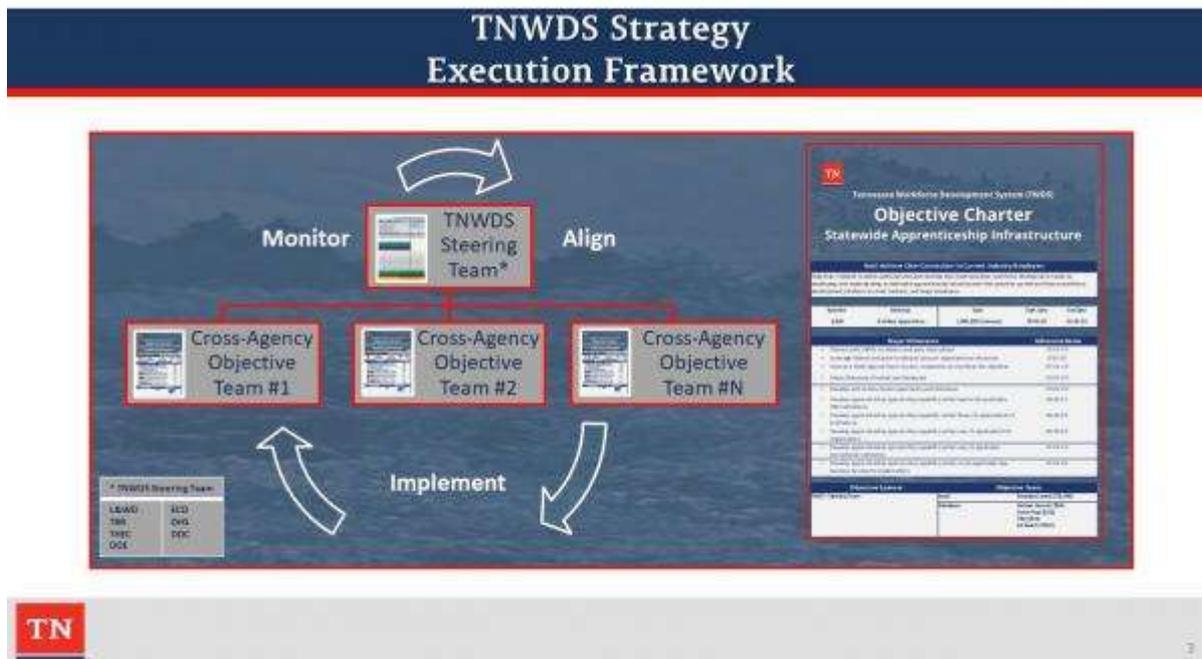


Figure 2: TN Workforce Development System Strategy - Goals & Objectives



**Figure 3 - TNWDS Strategy - Execution Framework**

The Workforce System Vision is to increase the competitive position of Tennessee business through the development of a highly skilled workforce.

## 2. Goals

*Under the guidance of the State Workforce Board, clarified in their recommendation to Governor Bill Lee, the Tennessee Department of Labor & Workforce Development has been charged with developing a plan that seamlessly integrates the service delivery of all programs, in order to improve the success outcomes for the Tennesseans that utilize our programs. This primary goal centers on (1) maximizing the co-enrollment opportunity, (2) developing new intake and referral processes across programs, and (3) designing a reporting system to better analyze performance and outcomes.*

*Connected to the strategy of tighter integration between programs, the State launched a Key Performance Indicator initiative that provides performance and planning resources to the Local Workforce Development Areas (LWDA), across all major programs. The progress thus far has allowed the LWDAs to clearly visualize how all programs can improve performance, as well as conceptualize opportunities to maximize co-enrollment strategies.*

*Within the framework established for the Tennessee Workforce Development System (TNWDS), the underlying goal centers on activating the various programs in more intentional and integrated ways to support the state's vision to bring forward a multi-agency strategy to better serve Tennesseans. In turn, the opportunity to integrate all workforce programs into the TNWDS supports the vision of the State Workforce Board to increase participation and performance in a more integrated manner.*

*The progress thus far has highlighted how a multi-agency strategy, combined with a value for streamlined program integration, can produce new levels of effectiveness and efficiency. The Re-Employment strategy for TNWDS has provided a space for Title I, Title II, Title III, and Title IV programs to begin crafting new procedures, that also incorporate resources from higher education and other public programs.*

*The ultimate vision is to increase performance for each program individually by adding service capacity collectively through an integrated approach.*

The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program is embarking on a 4-year strategic plan to transform the Vocational Rehabilitation Program and revolutionize the customer experience. Focusing on the customer and the customer experience, the goal of the transformation is to create an environment where individuals and businesses served, along with VR staff and partners feel welcome, informed, and encouraged.

At the end of the transformation, VR will embody the following:

- VR is responsive, welcoming, informative, and encouraging showing individuals and businesses what is possible.
- Businesses seek out VR services to transform their operations and meet their workforce needs and ultimately improve their bottom line.
- Community Tennessee Rehabilitation Centers (CTRCs) are transformed into community-based resource centers offering community-based employment training and connecting VR and non-VR customers to education, training and employment resources.
- Pre-employment transition services (Pre-ETS) are coordinated, collaborative, connected services that prepare students with disabilities for a seamless transition to life after high school.

In order to achieve this transformation, the division has identified five strategic priorities as outlined below:

Communication – Foster trust and credibility with internal and external stakeholders through reliable, accurate, transparent, and timely two-way communication.

Talent Management - Support a professional workforce that is organized and structured to deliver high quality vocational rehabilitation services through effective teams.

Modernization of Systems and Processes - Implement integrated systems and business processes that promote operational efficiency and programmatic effectiveness focused on the customer experience.

Revolutionize Service Delivery - Build innovative and effective service delivery models to better support businesses and individuals with disabilities in driving the achievement of their employment goals.

Data Driven Services and Outcomes - Achieve improved employment outcomes for people with disabilities through data driven rehabilitation services and employment initiatives.

The VR strategic plan, combined with recommendations from the comprehensive statewide needs assessment that VR conducted in 2019, align well and complement the Tennessee Workforce Development System Strategic Goals 2020-2024.

Goals for preparing an educated and skilled workforce

The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program agrees with, supports, and will work with WIOA partners to achieve the Tennessee Workforce Development System Strategic Goals 2020-2024. In particular, the VR Services Program has identified division-specific goals that will directly help to support these Strategic Goals.

**Goal #1 – I. Apprenticeship:** The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program is aligning career pathway services with other partners to help individuals with disabilities enter or advance within a specific occupation or occupational cluster through registered apprenticeships. The VR Services Program's Business Services Unit will work closely with the Tennessee Department of Labor and Workforce Development and other partner subject matter experts to assess and identify apprenticeship programs across the state in order to identify potential VR customers who can participate in apprenticeship training that will lead to economic self-sufficiency.

**Goal #2 – I. Work-Based Learning (K-12):** The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program conducted a comprehensive statewide needs assessment that revealed that pre-employment transition service (Pre-ETS) providers, educators, and parents all felt that youth with disabilities do and could greatly benefit from Pre-ETS services. The disconnect revealed in the Pre-ETS Needs Assessment is ensuring that those who need the services know about the services. Communicating and informing the public, schools, youth, parents, and stakeholders about Pre-ETS services is something that the division has been and will continue to address.

**Goal #2 – II. Adult Education Post-Secondary Credential:** The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program operates TRC Smyrna, a CTE center that offers 9 Areas of Study that provide opportunities to obtain national certifications and licenses that are industry-recognized, portable, and/or stackable. These areas of study include: Automotive Detailing Technician, Automotive Maintenance & Lubrication Technician, Business Education Technology, Certified Logistics Associate/Technician, Certified Production Technician, Customer Care, Food Service, Power Equipment, and Pharmacy Technician.

#### Goals for meeting the skilled workforce needs of employers

The Workforce System goals were developed based on the economic and workforce analysis, comprehensive statewide needs assessment, and Governor Lee's State Government 2020 Priority Initiatives. To support the achievement of Governor Lee's priorities and the Workforce System Goals identified in this plan, the Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program collaborated with DHS sister agencies to develop a Customer-Focused Government Plan which includes key customer-focused operational goals and strategic initiatives that directly align with the Governor's 2020 Priorities.

#### Governor's Priority: Education & Workforce Development

- - Goal: To be the fastest improving state in the country.

#### Governor's Priority: Transparent & Efficient Government

- Goal: To be the best-managed state, providing high quality services at the lowest possible price to taxpayers.
  - DHS Operational Goal: By June 2020, enhance the customer experience relative to timeliness.
  - Purpose: To improve the Vocational Rehabilitation customer service statewide by reducing the average number of days to develop an individual plan for employment (IPE).

- DHS Strategic Initiative: By June 2020, develop a plan for stronger engagement of customer voice across all divisions of DHS.
  - Purpose: Greater opportunities to engage customer perspective and develop customer-centered solutions for all programs and services in DHS.
- DHS Strategic Initiative: By June 30 2020, strengthen the department's procedural management of DHS data assets by implementing a data governance policy.
  - Purpose: Ensure trusted data is only used for business purposes, decision making, and in accordance with laws, rules and regulations.

Governor's Priority: Healthier Tennessee Priority

- Goal: To promote healthy behavior and provide high quality services to our most vulnerable populations.

Governor's Priority: Jobs & Rural Economic Development

- Goal: To be the #1 state in the Southeast for high quality jobs.
  - DHS Operational Goal: By June 2020 increase the number of customers from the 15 distressed counties engaged in vocational rehabilitation, independent living and pre-employment transition services.
    - Purpose: To build stronger rural communities by connecting Tennesseans from the 15 distressed counties to employment, education and support services.
  - DHS Strategic Initiative: By June 2020, enhance the customer experience by increasing access to services statewide largely targeting the 15 distressed counties.
    - Purpose: Improves customer service through expansion of service delivery to customers.

Governor's Priority: Public Safety &

Criminal Justice Reform

- Goal: To promote the safety and security of Tennesseans.

### **Adult Education**

*To help the Tennessee Workforce Development System achieve its vision of a more cohesive, integrated system, the Adult Education program, as overseen by the TN Department of Labor and Workforce Development, has established the following goals:*

***GOAL 1: Develop a strategy and structure for Adult Education to implement a post-secondary pathway that shows measurable progress by September 30, 2021. Re-evaluation will occur at this time for program adjustments.***

*To establish statewide post-secondary pathways, Adult Education will create a framework that includes:*

1. *Basic skills education that concurrently prepares students for post-secondary by aligning classroom instruction to the College and Career Readiness standards for Adult Education and when applicable make referrals to the Out of School Youth (OSY) program.*
2. *Instruction to improve student outcomes in targeted industry sectors such as healthcare, IT, and advanced manufacturing by working with subject matter experts in those fields creating a single set of objectives for participants*
3. *Standard performance and evaluation metrics to determine successful program outcomes based on the federal negotiated targets.*
4. *In partnership with WIRED, establishing baseline data for enrollment and performance of Adult Education participants in higher education and employment focusing on individuals with barriers to employment and out of school youth.*

**GOAL 2: Complete monitoring audits of all service providers to ensure compliance related to allowable costs and that activities are conducted according to federal regulations.**

*Adult Education will establish a culture of continuous and sustained improvement of Adult Education services. The program will:*

1. *Ensure all programs and activities comply with applicable laws and policies*
2. *Mitigate risks associated with suboptimal workforce performance or outcomes and correcting all documented findings from OCTAE*
3. *Provide resources for innovation in the delivery of workforce programs and services*
4. *Review monthly enrollment and outcomes data and conduct needed technical assistance through virtual and onsite visits*
5. *Convene providers quarterly for in-person training and development*
6. *Develop monthly and quarterly budget reports to track expenditure rates of program funds*
7. *Draft and release RFP and onboard new service providers by July 1, 2020*

**GOAL 3: Develop a strategy and structure to support a statewide apprenticeship program that shows measurable progress by September 30, 2021. Re-evaluation will occur at this time for program adjustments.**

*As part of TDLWD's rollout of "Apprenticeship TN", The Adult Education program will create and modify programming to support enrollment and expansion of apprenticeships for students that are basic skills deficient, English language learners, and those with barriers to employment. The program will:*

1. *Develop pre-apprenticeship opportunities for students in high-growth and high-need sectors*
2. *Participate in all meetings, convenings, and trainings related to apprenticeship*
3. *Review RAPIDS data to track AE student entry and completion*
4. *Establish baseline metrics for AE students gaining industry-recognized credentials*

5. *Expand workforce preparation activities (e.g. IET, pre-apprenticeship) offerings within 3 jail facilities by PY2022*
6. *Develop pre-apprenticeship models in coordination with postsecondary, trade associations, or employers having four (4) programs by PY2021, and eight (8) programs by PY2022.*

**GOAL 4: Support the public workforce development system and provide data throughout the year. Provide a clear connection to current industry and employers (demand), a clear pipeline development infrastructure (supply), a clear integration with economic development (investment), and clear outcome visibility (metrics, data, reports, predictive analytics, and research).**

*As a core WIOA partner, the Adult Education program is expected to support the overall growth and expansion of the TN workforce system. The program will:*

1. *Increase workforce pipeline by increasing AE enrollment by 10% each year.*
2. *Expand program and service offerings with jails to include workforce preparation, pre-apprenticeship ,remediation, and access to Re-Entry services*
3. *Increase co-enrollment of AE participants with core programs in the American Job Center network through strengthening our referral process with partners*
4. *Create pay-for-performance demonstration project in urban market*
5. *Expand integrated education and training with five employers in diverse sectors and develop a plan to scale by September 30, 2020*

### 3. Performance Goals

**Table 16: TN Core Program: Title I – Adult Program**

TN Core Program: Title I – Adult Program	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	83.5%		84.0%	
Employment (Fourth Quarter after Exit)	83.5%		83.5%	
Median Earnings (Second Quarter after Exit)	\$6,650		\$6,680	
Credential Attainment Rate	59.0%		60.0%	

TN Core Program: Title I – Adult Program	Program Year 2020		Program Year 2021	
Measurable Skill	52.0%		53.0%	
Gains				

**Table 17: TN Core Program: Title I – Dislocated Worker Program**

TN Core Program: Title I – Dislocated Worker Program	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	82.5%		82.5%	
Employment (Fourth Quarter after Exit)	82.0%		82.0%	
Median Earnings (Second Quarter after Exit)	\$7,000		\$7,100	
Credential Attainment Rate	69.0%		70.0%	
Measurable Skill	48.0%		49.0%	
Gains				

**Table 18: TN Core Program: Title I – Youth Program**

TN Core Program: Title I – Youth Program	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	79.5%		80.0%	
Employment (Fourth Quarter after Exit)	79.0%		80.0%	
Median Earnings (Second Quarter after Exit)	\$3,300		\$3,400	

TN Core Program: Title I – Youth Program	Program Year 2020		Program Year 2021	
Credential	70.0%		71.0%	
Attainment Rate				
Measurable Skill	45.0%		47.0%	
Gains				

**Table 19: TN Core Program: Title II – Adult Education and Family Literacy Act Program**

TN Core Program: Title II – Adult Education and Family Literacy Act Program	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	41.0%		42.0%	
Employment (Fourth Quarter after Exit)	42.0%		43.0%	
Median Earnings (Second Quarter after Exit)	\$3,300		\$3,400	
Credential	30.0%		31.0%	
Attainment Rate				
Measurable Skill	35.0%		36.0%	
Gains				

**Table 20: TN Core Program: Wagner-Peyser Act Employment Service Program**

TN Core Program: Wagner-Peyser Act Employment Service Program	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	66.0%		67.0%	
Employment (Fourth Quarter after Exit)	66.0%		67.0%	

TN Core Program: Wagner-Peyser Act Employment Service Program	Program Year 2020		Program Year 2021	
Median Earnings (Second Quarter after Exit)	\$4,700		\$4,800	
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable

**Table 21: TN Core Program: Vocational Rehabilitation Program**

TN Core Program: Vocational Rehabilitation Program	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter after Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter after Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	20.0%	23.0%	25.0%	26.0%

#### 4. Assessment

Since 2018 State Plan Modifications, the State conducted an assessment in 2019 on the overall effectiveness of the workforce development system by utilizing a third-party contractor. This entity completed the statewide evaluation of the workforce system organizational structure, and also the operating model's ability to support efficient processes and internal controls. The assessment encompassed 1) highlighted strengths and weaknesses of the current organization structure; 2) review of roles and responsibilities for proper role alignment; 3) provided recommendations regarding operational policies and procedures; 4) assessment of current risk/control/performance monitoring capabilities with areas of improvement identified; 5) review of internal control design and assessment of operating effectiveness of key controls; and 6) review of current data entry and reporting process to

identify opportunities to implement automation. Observations and recommendations were made regarding the above referenced processes and internal controls for all nine Local Workforce Development Areas (LWDAs), as well for the state. As a result of this evaluation, follow up discussions have identified crucial improvements and strategies needed in the existing workforce structure to effectively and efficiently support the Governor's workforce initiatives for Tennessee.

To further evaluate and improve the system; the State will be utilizing the same third-party contractor to follow-up on the previous assessment and focus on the following key six areas.

1. Organizational structure analysis - Contractor will assist State in implementing recommendations related to governance and process, including (a) performing a detailed quantitative analysis of the various Local Workforce Development Area (LWDA) organizational structures, which also includes analyzing the benefits and drawbacks associated with each structure, (b) developing key metrics to analyze administrative and provider costs, and (c) reviewing board staff makeup and provider costs; Contractor will analyze the benefits of structuring all LWDAs in the same manner;
2. Strategic plan process review - Contractor will work with one LWDA (as chosen by the State) to assist the local area with implementing recommendations related to the area's strategic plan; Contractor will assist the LWDAs in documenting their processes, including stakeholder involvement and ongoing monitoring, and the development of key metrics to measure outcomes; Contractor will work with the LWDA to create a roadmap to achieve desired strategic outcomes;
3. Board development - Contractor will design a leadership development program to offer to Local Workforce Development Boards; Contractor will conduct two learning sessions;
4. Process design and deployment - Contractor will document 4-6 future state processes; Deploy processes at 1-2 local areas;
5. Customer experience pilot - Contractor will work with all LWDAs to perform a customer experience journey map at local AJCs - Contractor will develop persona matrices for LWDAs; Contractor will work with State to develop Customer Journey Rollout plan;
6. Technology improvements - Contractor will work with State to identify and document leading practices for the VOS system; Contractor will review use of Grants4TN and develop design requirements for replacement system.

Additional assessment of the workforce system will continue to take place through Quarterly and Annual monitoring of the LWDAs to include feedback from leadership from each of the 9 LWDAs. Those monitoring reviews will allow the State to determine the capacity of each LWDA and provide opportunities to determine their current service level and areas that will need improvement. Evaluation of specific programs will also take place such as an official evaluation of the Re-Employment Services and Eligibility Assessment (RESEA) program per UIPL 07-19. The State will be utilizing a third-party contractor to evaluate the effectiveness of the RESEA program to include considering new ideas such as the utilization of self-scheduling, the mobile American Job Center (AJC), and video technology (i.e. Skype).

#### *Assessment of The Tennessee Workforce Development System*

*The assessment framework for the overall effectiveness for the Tennessee Workforce Development System centers on a series of project charters. These project charters focus on the various aspects of workforce development that symbolize the necessary elements of a high-performing workforce system, such as work-based learning strategies, transition supports for exiting Veterans, and re-employment programming. The milestones and outcomes for the different project charters were due*

*on March 19, 2020. Upon submission, state leadership will review and schedule formal presentations to approval all plans. The interruptions caused by the COVID-19 Pandemic have delayed the review process for all the project charters designated for the TNWDS. Thus, progress has been delayed until further notice.*

The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program has identified Data Driven Services and Outcomes as one of the priorities in their division's 2019-2023 Strategic Plan. The goal of this priority is to achieve improved employment outcomes for people with disabilities through data driven rehabilitation services and employment initiatives. The Division of Rehabilitation Services (DRS) is working to enhance the capacity of staff to use and analyze data to inform and improve practices and outcomes, advance the integration of data systems with other resources as appropriate to facilitate innovative service delivery and collaboration, and to share program data and outcomes with stakeholders to create an environment that promotes continuous quality improvement.

### **Adult Education**

*TDLWD will conduct monitoring and evaluation activities of local adult education providers as outlined in later sections. The monitoring and evaluation activities will analyze the adult basic education, ESL/IELCE activities, corrections education, pre-apprenticeship activities, and integrated education and training activities. A crucial part of this plan is the regular analyses of performance data that will be conducted in order to evaluate the quality of the program. To ensure departmental capacity to handle this responsibility, TDLWD has recently created and filled a new staff position within the Adult Education Division: a systems & analytics specialist. The specialist works to create real-time dashboards and various monthly reports that show program performance data, at the local level, by LWDA, and the cumulative statewide level. These analyses will focus on student enrollment, measurable skill gains, post-exit outcomes, expenditures, and other areas of interest that indicate program quality. The results of these analyses will aid in conducting targeted technical assistance, design professional development, or issue guidance according to the areas of need in order to improve adult education program quality. The analyses will also seek to determine if the goals of the program are being met, including the extent to which implementation of postsecondary pathways and pre-apprenticeships has been successful. We will also evaluate the extent to which expanding service offerings in jails, with pay-performance models, and with integrated education and training programs has been effective—these are other major Adult Education program goals.*

## **c. State Strategy**

The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must take into account the State's economic, workforce, and workforce development, education and training activities and analysis provided in Section (a) above. Include discussion of specific strategies to address the needs of populations provided in Section (a).

**1. Describe the strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career**

pathways, as required by WIOA section 101(d)(3)(B), (D). “Career pathway” is defined at WIOA section 3(7) and includes registered apprenticeship. “In-demand industry sector or occupation” is defined at WIOA section 3(23)

2. Describe the strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available to the State to achieve fully integrated customer services consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2)

#### **State Strategy**

1. Describe the strategies the State will implement

Aligning Tennessee’s local workforce development areas with Tennessee’s Economic and Community Development (ECD) base camps, allowed Tennessee’s Workforce System an opportunity to regionalize economic and workforce development activities and optimize opportunities to share and leverage resources in the areas of workforce development partnerships. This realignment was a pivotal strategy for implementing sector partnerships between education, workforce, and economic development.

Tennessee’s Drive to 55 goal is to equip at least 55% of Tennesseans with a college degree or certificate by 2025. The statewide Drive to 55 initiative, in which all training providers will have to provide training that results in credentials and skills upgrades to meet the workforce needs and those of the industry sectors demanding skilled workers, refined the relationships between ECD, workforce development, and career and technical education. These key partnerships started with a supply and demand outlook then expanded to a development and design continuum for building a pipeline of highly skilled workers for Tennessee employers.

Through building the local workforce development board’s engagement, developing regional and local strategies, and leveraging data and partnerships Tennessee has implemented evidence-based sector strategies and career pathways.

#### **Building the Local Workforce Development Board’s Engagement**

To meet the needs of employers and align education and training opportunities with targeted industries and occupations, local workforce development boards are equipped with regional planning

councils which include members of the core partners as well as other partners. The regional planning council members are equipped to identify and advise the local boards on regional and local in-demand and emerging sectors. Aligning all workforce system partners facing business or industry allows local workforce boards to identify skills gaps and make data-informed decisions to correlate and identify a potential underrepresented talent pool (public assistance, reentry, an aging workforce, rural distressed counties, etc.) for the industry.

The board's engagement assists with building regional and local talent pipelines, which is led by the local workforce boards and implemented by the local Business Service Team (BST) members. BST members are tasked with maintaining relationships with employers for the purpose of placing workers trained through the employer-focused workforce development and postsecondary education systems.

### **Regional Industry Engagement**

Tennessee's investment of its resources to develop strategies that fit individual industry sector needs, particularly the high-growth sectors of the economy is a priority. The State Workforce Development Board (SWDB) implemented rigorous local and regional planning elements and requirements to drive high-quality career pathways and strategies. Locally and regionally-based sector partnerships have been formed to provide a mechanism for establishing sector strategies throughout the state. Workforce services have to tie most of its resources for training workers to those industry sectors that drive the states existing and emerging economy while partnering with the education system developing the curriculum necessary for building these skills.

East Tennessee had a regional Education to Employment Summit (E2E) designed to bring together k-12 and post-secondary educational leaders, business and industry leaders, economic and workforce development professionals, and government leaders to discuss each party's role in developing the workforce pipeline. Local business and industry leaders shared what they need to be successful and how k-12 and post-secondary could help them.

Southeast local workforce development area developed work-based learning opportunities at Hamilton County High Schools in conjunction with an industry partner Gestamp, a top tier automobile production supplier. The partnership allows high school students an opportunity to work a full day and gain on-the-job training while seamlessly earning their high school diploma and postsecondary credit.

Through the Registered Electrical Apprenticeship Preparation (REAP) initiative, in partnership with Amtek, an electrical contracting and engineering career pathway was established at Lake County High. Graduating seniors expressing an interest in an electrician career participated in a 10-week pre-apprenticeship program to learn the fundamentals of basic electricity and construction applications. Those who successfully completed the program were eligible for hire and could be accepted into the 4-year registered apprenticeship program.

### **Leveraging Data and Partnerships to Inform Strategies and Drive Performance**

TN uses long term projection data to identify in-demand industries and occupations. P20 Connect TN is the state's longitudinal data system, which contains data across sectors and over time to illustrate the state's progress in education and workforce development allowing policymakers and practitioners to make fact-based decisions about how best to promote opportunities for all Tennesseans. The Workforce Insights, Research and Reporting Engine Division also known as WIRED continuously produces information collected by Labor Market Information to assist local workforce development areas in determining strategy and drive evidence-based decisions. The state and local workforce boards have access to a broad range of economic and administrative data that can be leveraged to help sector partnerships and activities, coupled with adding employers and regional council inclusion, yields robust data-driven decisions by understanding the needs of the current and future workforce and to assist with prioritizing target industries.

The State is developing an apprenticeship strategy to support the unique needs and concerns of Tennesseans.

### **Career Pathways**

Maximizing core program coordination and utilizing career pathways as well as evaluating to ensure that training and education requirements match the state's labor market needs allows Tennessee Workforce Areas an opportunity to lead the way nationwide in K-12 education reform. We have continued that momentum and expanded our focus to include post-secondary education through a pair of innovative Drive to 55 initiatives through Tennessee Pathways and the Tennessee Promise.

Tennessee's workforce development areas promote career exploration through career pathways also known as TN Pathways so young people can acquire educational, technical, and social skills that enhance career development. Working with regional councils including the regional pathways coordinators, we have enhanced efforts to improve communication, coordination, and collaboration in preparing youth for post-secondary studies or the world of work. Other strategies include: incorporating career pathways system as a model to better guide young people, incorporating pre-apprenticeship programs to offer young people opportunities to gain technical skills that are best learned on the job, and disseminating information regarding future in-demand labor market needs to young adults when entering the workforce system.

Tennessee Pathways has created alignment between K-12, postsecondary education, workforce development, and employers so that students have a clear and guided pathway to gain the knowledge and experience needed to move seamlessly into the workforce. We believe that all students deserve access to high-quality careers that provide a living wage and opportunities for advancement.

Tennessee Reconnect has created opportunities for adults to attend a community college or technical college and complete a postsecondary degree or credential, tuition-free. All Tennessee adults who do not already have an associate or bachelor degree are eligible to attend community college or technical college tuition-free starting in the fall of 2018. While TN is making great strides in increasing the number of high school students who enroll in college, we cannot meet the full job market demands without engaging and supporting more adult learners. Tennessee is the first state in the nation to offer tuition-free community or technical college to adults. The Drive to 55 Alliance is helping lead the charge for Tennessee Reconnect through increased private-sector awareness, ownership and support for the long term steps to prepare our workforce and state for the future.

The workforce system is interrelated because the programs and agencies serve either a common customer or are charged with achieving similar employment and education outcomes for their targeted customer groups.

Tennessee's partnerships across local and regional economies, including employers, are making significant strides promoting sector strategies to enhance workforce strategies and activities across the workforce system. This is building not just a kindergarten to job pathway but a true map with data supported programs of study that allows Tennesseans to progress from kindergarten to career with various off and on ramps to gain industry-recognized certifications such as work-based learning, industry lead opportunities with GESTAMP; pre-apprenticeship opportunities in Lake county; career exploration conventions in Northeast; externships for teachers; and work-release programs for the justice-involved populations.

TDHS will explore the employer's needs of customers, community employment partners, and other stakeholders as needed to identify current workforce needs. TDHS host resource fairs throughout the year to bring together customers and potential employers in their communities. The TANF providers

form relationships in the communities with employers, so they are aware of the employment needs in the community.

The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program is aligning career pathway services with other partners to help individuals with disabilities enter or advance within a specific occupation or occupational cluster through registered apprenticeships. The VR Services Program's Business Services Unit will work closely with the Tennessee Department of Labor and Workforce Development and other partner subject matter experts to assess and identify apprenticeship programs across the state in order to identify potential VR customers who can participate in apprenticeship training that will lead to economic self-sufficiency.

The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program supports the provision of post-secondary training that will lead to economic self-sufficiency. The VR Services Program supports over 1,800 customers per year in vocational/technical schools, community colleges and four-year colleges. Credentials include diplomas, certificates, associate degrees, bachelor's degrees and graduate and post-graduate degrees. Assessments for post-secondary training include consideration of current or projected in-demand occupations that will lead to economic self-sufficiency and opportunities for advancement.

## 2. Describe the strategies the State will use to align the core programs

The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program as a core partner has staff co-located in all comprehensive American Job Centers. Co-located VR staff work together with all co-located partners to provide seamless services for people with disabilities through collaboration on referrals, program eligibility, program planning, available services and shared funding, when appropriate.

At the local level VR staff works with local government and community programs, including local sheriffs and TN Department of Corrections facilities, to educate the appropriate individuals about the VR Services Program and to develop means of making referrals for individuals with disabilities.

At the regional level VR is represented on all Local Workforce Development Boards, while at the state level, VR administrative staff works closely with TN Department of Labor and Workforce Development (TDLWD) and other core partner staff on integrated customer service planning and data reporting. The VR Services Program aligned its regional boundaries with TN Economic Community Development and TDLWD regions to align VR with local economic, program and service provision planning and development and partner representation.

TANF will utilize other agencies at the One-Stop locations to co-enroll customers into activities. This will allow a more diverse set of activities for our customers to make sure their needs are being met, while adhering to the time limits with TANF.

*Tennessee's Workforce Development system is a highly interdependent and disparate network of state agencies and state organizations [Tennessee Board of Regents (TBR), Tennessee Higher Education Commission (THEC), Tennessee Department of Economic & Community Development (TNECD), Tennessee Department of Corrections (TDOC), Tennessee Department of Human Services (DHS), Tennessee Department of Education (DOE), Tennessee Department of Labor & Workforce Development (TLWD), and others]. And while the system boasts individual sources of workforce excellence, the multiple agencies and organizations charged with executing workforce development struggle to manage and innovate in a comprehensive and cohesive manner.*

Examples include:

1. *trouble in executing a timely one-state approach in response to economic development opportunities;*
2. *the lack of an apprenticeship/pre-apprenticeship effort (behind in the southeast); and*
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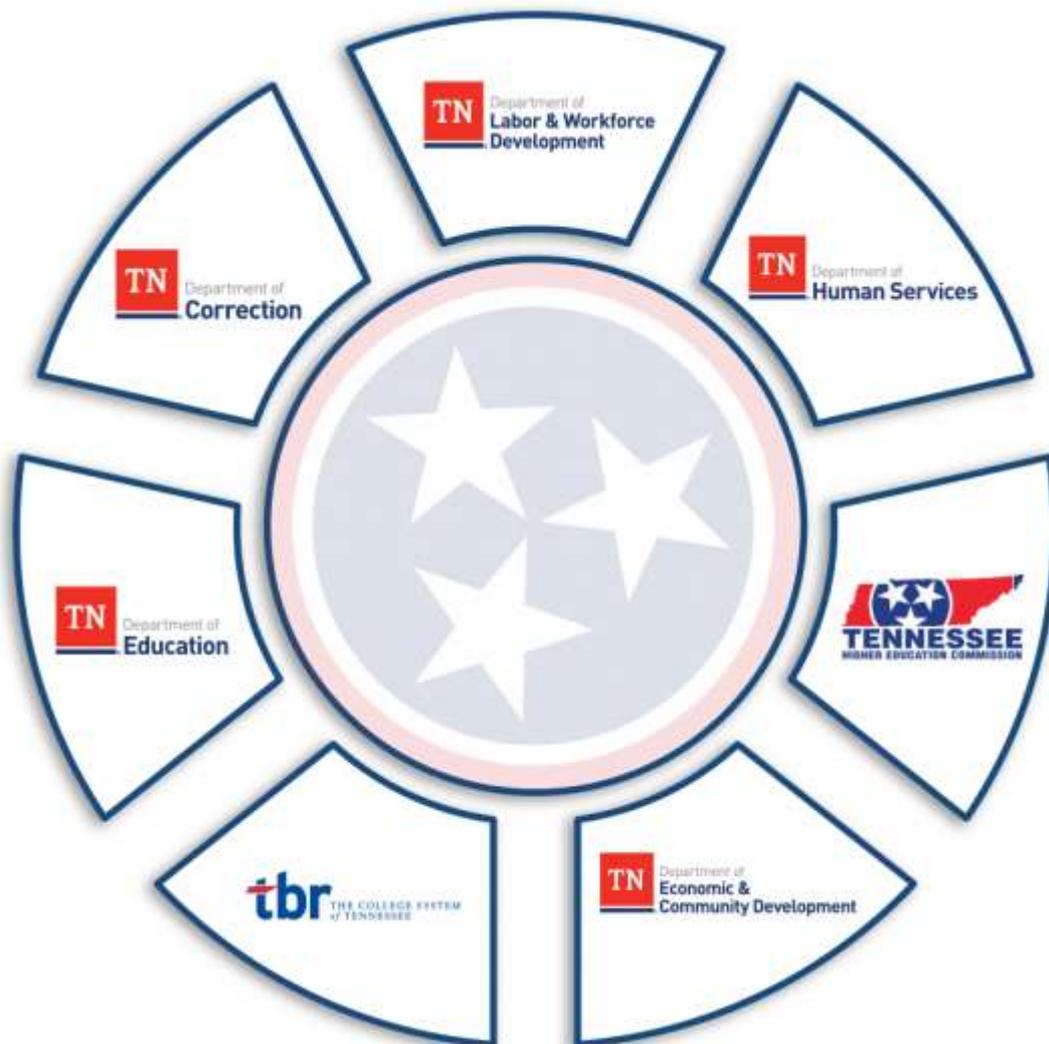


Figure 1: The Tennessee Workforce Development System

*Execution of a comprehensive and cohesive workforce development strategy has to account for the inherent interdependency through a formalized strategy of shared projects, shared processes, and shared metrics under centralized leadership and/or consolidation of functions. As a result, the Tennessee Workforce Development System (TNWDS) Steering Team has been formed. The team consists of members from TBR, THEC, TNECD, TDOC, DHS, & DOE and is led by TLWD. The team is charged with:*

1. *Aligning Strategy*
2. *Implementing Initiatives, and*
3. *Monitoring Progress for Tennessee's workforce development system.*

*The team will receive support and guidance from a broad-based Advisory Committee (TBD).*

*The Workforce Development strategy in this document is a product of this collaborative execution model. The Tennessee Workforce Development System*

*On the whole, the four major strategic goals for The Tennessee Workforce Development System are:*

- *Clear Connection to Current Industry/Employers*
- *Clear Pipeline Development Infrastructure*
- *Clear Integration with Economic Development*
- *Outcome Visibility - Clear Data/Reporting and Predictive Analytics*

*Components of Clear Connection to Current Industry/Employers (demand side) include:*

- *Scalable Public/Private Partnerships*
- *Responsive Incumbent Training Programs*
- *Responsive Talent Acquisition Programs*

*Components of Clear Pipeline Development Infrastructure (supply side) include:*

- *Pathway Processes (training/education to work)*
- - *K-12*
  - *Adult Education*
  - *Re-Entry*
  - *Dislocated Worker/Re-Employment (Unemployment Insurance/Workers Comp)*
  - *Military Transition*
  - *Post-Secondary*

*Components of Clear Integration with Economic Development (investment) include:*

- *Cross Agency Incentive Process*
- *Cross Agency Project Management Process*

Components of Outcome Visibility (research and metrics) include:

- Cross Agency Metrics
- Increased Leveraging of P20 Data Set for Metric Set and Analytics, specifically:
- - Correlations/Comparisons for success variable sets relative to workforce development initiatives and interventions.

Under this strategic framework, and accounting for its operational components, the TNWDS Steering Team will execute the following workforce development strategy as part of a collective 4-year plan. For reference, an overview of the strategic plan is included in figure 2 and the execution framework in figure 3.



Figure 2: TN Workforce Development System Strategy - Goals & Objectives

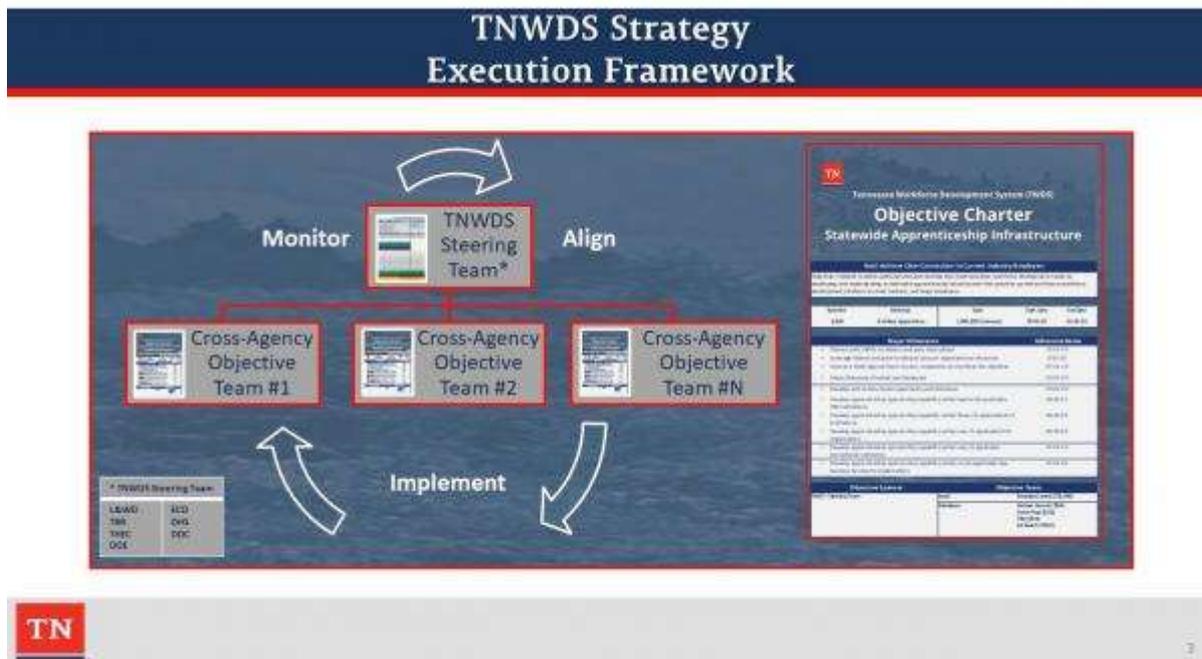


Figure 3: TNWDS Strategy – Execution Framework

*The Workforce System Vision is to increase the competitive position of Tennessee business through the development of a highly skilled workforce.*

*Under the guidance of the State Workforce Board, clarified in their recommendation to Governor Bill Lee, the Tennessee Department of Labor & Workforce Development has been charged with developing a plan that seamlessly integrates the service delivery of all programs, in order to improve the success outcomes for the Tennesseans that utilize our programs. This primary goal centers on (1) maximizing the co-enrollment opportunity, (2) developing new intake and referral processes across programs, and (3) designing a reporting system to better analyze performance and outcomes.*

*Connected to the strategy of tighter integration between programs, the State launched a Key Performance Indicator initiative that provides performance and planning resources to the Local Workforce Development Areas (LWDA), across all major programs. The progress thus far has allowed the LWDAs to clearly visualize how all programs can improve performance, as well as conceptualize opportunities to maximize co-enrollment strategies.*

*Within the framework established for the Tennessee Workforce Development System (TNWDS), the underlying goal centers on activating the various programs in more intentional and integrated ways to support the state's vision to bring forward a multi-agency strategy to better serve Tennesseans. In turn, the opportunity to integrate all workforce programs into the TNWDS supports the vision of the State Workforce Board to increase participation and performance in a more integrated manner.*

*The progress thus far has highlighted how a multi-agency strategy, combined with a value for streamlined program integration, can produce new levels of effectiveness and efficiency. The Re-Employment strategy for TNWDS has provided a space for Title I, Title II, Title III, and Title IV programs begin crafting new procedures, that also incorporate resources from higher education and other public programs.*

*The ultimate vision is to increase performance for each program individually by adding service capacity collectively through an integrated approach.*

*With regard to meeting the needs of specific populations, the overall strategy for the state is designed to provide a comprehensive set of effective and efficient services to the Tennesseans with the greatest barriers to employment, or those populations traditionally known to have limited economic mobility. Tennesseans considered low-income, justice-involved, veterans, disabled, and several other categories where significant barriers are present, are the focal point of the Tennessee Workforce Development System strategy. With an intentional approach to greater forms of collaboration across agencies and critical partners, the specific charters (see Figure 2 above) designated for the TNWDS plan are intended to bring forth collaboration not only within the core programs within the American Job Centers, but also across other related services. The purpose of this approach is to both simplify and streamline the service-delivery process for citizens with considerable barriers to employment, which in turn is expected to improve the overall customer experience.*

### III. Operational Planning Elements

The Unified or Combined State Plan must include an Operational Planning Elements section that supports the State’s strategy and the system-wide vision described in Section II(c) above. Unless otherwise noted, all Operational Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. This section must include—

#### a. State Strategy Implementation

The Unified or Combined State Plan must include—

##### 1. State Board Functions

Describe how the State board will implement its functions under section 101(d) of WIOA (i.e., provide a description of Board operational structures and decision making processes to ensure such functions are carried out).

The Tennessee Department of Labor and Workforce Development (TDLWD) serves as the administrative entity for all Workforce Innovation and Opportunity Act (WIOA) funds awarded to Tennessee from the US Department of Labor (USDOL). USDOL Region 3, located in Atlanta, Georgia, provides the federal oversight and technical assistance to TDLWD on all programmatic and fiscal matters. *Multiple federal agencies have oversight of programs contained in the TN public workforce system including USDOL, the US Department of Education, the US Department of Agriculture, and the US Department of Health and Human Services.*

Former Governor Bill Haslam’s Executive Order 46 designated the reconstitution of the State Workforce Development Board (SWDB) in accordance with Section 101 of WIOA. A State Board was appointed by the Governor according to WIOA. The State Board and Tennessee Department of Labor and Workforce Development are responsible for guiding the establishment of a statewide, seamless one-stop delivery system, called the American Job Center system (Workforce System).

The SWDB has four committees, including an Executive Committee composed of the Chair, Vice Chair, and committee chairs. The Executive Committee shall have supervision of the affairs of the Board between its business meetings, and conduct necessary business to ensure compliance with the Workforce Innovation and Opportunity Act (P.L. 113—128) as may be amended from time to time, and applicable State and Federal regulations. The Executive Committee may make recommendations to the Board, and perform such other duties as are specified in the bylaws. The Executive Committee

shall be subject to the order of the Board, and none of its acts shall conflict with these bylaws or policies of the Board.

There are three standing committees of the Board, for which the Board Chair appoints a Chair. These individuals are joined by a Vice Chair, Staff Liaison, and other Board members with the opportunity to develop ad-hoc committees to include additional partners from higher education, HUD, Community Service Block, Mental Health, and community/faith based organizations. The committees shall convene at least four times per year in advance of the full Board meetings and as needed upon the advisement of the Board Chair.

**Oversight Committee- the Oversight Committee has the following responsibilities:**

- Advise the Governor on program and policy changes under WIOA;
- Be the lead monitor of State's performance/accountability;
- Serve as an advisor to review statewide program alignment, assessment and evaluation of statewide workforce systems; and
- Review and make recommendations on funding allocations

Recommended Ad-Hoc Committees:

- Fiscal- Minimum Participant Cost Rate (MPCR)/Obligations/Expenditures
- Performance- Key Performance Indicators (KPIs)/ Goals/Trends
- System Alignment- Joint Compliance and Monitoring

**Operations Committee - the Operations Committee has the following responsibilities:**

- Oversee the continuous improvement of WIOA programs, activities, and operations;
- Be the lead coordinator of policies and provision of WIOA services;
- Review and make recommendations for performance reporting, including Labor Market Information;
- Oversee all WIOA Youth program initiatives; and
- Lead the development, maintenance and modification of State, Regional, and Local plans

Recommended Ad- Hoc Committees:

- Youth-Career Technical Education/ Work-Based Learning/ Apprenticeships
- Priority Populations- Justice Involved/Public Assistance Recipients/ Older Worker Population
- Service Delivery- Local & Regional Plan Strategies/ Evidence-Based Practices

**Innovation Committee- the Innovation Committee has the following responsibilities:**

- Identify and share workforce system evidence- based best practices;
- Develop strategies for technology alignment and integration;
- Be the lead reviewer of service-model strategies in WIOA programs; and
- Special Projects (Grant Announcements, Funding Opportunities)

**Recommended Ad- Hoc Committees:**

- Technology- Continuous Improvement and Advancements
- Innovations- New methods to provide services to individuals, specifically in rural distressed counties;
- Special Projects- Special Grant Opportunities such as Campbell Strong/ Apprenticeship Grant, etc.

## 2. Implementation of State Strategy

Describe how the lead State agency with responsibility for the administration of each core program or a Combined Plan partner program included in this plan will implement the State's Strategies identified in Section II(c). above. This must include a description of—

### A. Core Program Activities to Implement the State's Strategy

Describe the activities the entities carrying out the respective core programs will fund to implement the State's strategies. Also, describe how such activities will be aligned across the core programs and Combined State Plan partner programs included in this plan and among the entities administering the programs, including using co-enrollment and other strategies, as appropriate.

The Tennessee Workforce System has integrated its services to allow all core and non-core partners to work collaboratively and seamlessly in the delivery of services available under multiple workforce service programs. The Workforce System strives for a robust implementation of business sector strategies, jobseeker universal access to career services; streamlined business services teams, linked assessments and referrals, and targeted training and placements. These will be achieved by functionally aligning staff and facilities to simplify customer service delivery, and by capitalizing on the strengths of the staff and/or technology to deliver services, leverage resources, and reduce duplication. This is also achieved through the close integration of Wagner-Peyser, WIOA Adult, Dislocated Worker, and Youth, and other partners within the Tennessee American Job Centers (AJCs) network.

The restructuring of Tennessee's Workforce System has simultaneously transformed employment, education, and training services delivered across the State. Universal access integrates an array of labor exchange services and allows workers, job seekers, and businesses to access these resources either on-site or through automation technology. Each center offers automated labor market information and internet access (including help to use the Jobs4TN online jobs database), on-site workshops as well as job placement, recruitment, and training referral services. The workforce services reinforced functional alignment by implementing Service Integration and One-Stop Delivery

System policies. These policies provide operational and functional guidance on the collaborative service delivery structure at the comprehensive and affiliate AJCs, as well as partner locations.

WIOA provides an opportunity for the Workforce System to align several programs to assist participants with barriers to build their skills and find family-supporting jobs.

As the administrator the Workforce System in Tennessee, TDLWD has the following benefits:

- We are at the center of workforce development in Tennessee (approximately \$80 million in federal funds is allocated to our Department each year)
- We work to connect employers looking for qualified workers (80,000 + job orders in Jobs4TN at any given point)
- We work to connect job seekers with hiring employers (approximately 225,000
- engage in services each year looking for employment and training opportunities)
- We prioritize our efforts based on demand occupations and serving people with
- barriers
- While we have to prioritize our efforts, we serve all companies looking for workers and support potential labor pools in connecting with job opportunities
- Job orders run the gamut from entry level with no educational priority to high skilled specific discipline
- Job applicants range from no high school equivalency diploma to 16 years of education and beyond

All Tennessee's current policies, guidance, and procedures are designed to ensure that the local development areas and key partners are aligned with the strategic direction of USDOL, the Governor, and the Tennessee Workforce Development Board. Tennessee has fully embraced the key principles of the Workforce Innovation and Opportunity Act. This has allowed the statewide network of locally operated workforce centers to achieve integration of WIOA programs. With WIOA TITLE I; Adult Education; Vocational Rehabilitation; Wagner-Peyser, TANF, veterans and Trade Act UI services as well as partnerships with SNAP, services are readily available in the AJCs. With the implementation of WIOA, specific strategies have been utilized to align the work of core and required partners at both the state and local level. Local Development Boards usually meet on a quarterly basis to provide guidance on specific actions necessary for local services to move forward and to make continuous improvements. MOUs between agencies have been implemented and changes made as needed to support the alignment of efforts and activities.

Core program activities offered through workforce training and case management services in the American Job Centers are as follows:

Adult Education and Literacy Program (Title II) Tennessee Adult Education programs provide instruction and student support services to adults who lack a high school credential or secondary level skills, or who are not proficient in English.

Wagner Peyser:

Tennessee Department of Human Services (TDHS) Vocational Rehabilitation (VR) Services Program as a core partner has staff co-located in all comprehensive American Job Centers (AJC). Where VR staff is co-located, the VR Services Program has committed funding to support AJC infrastructure

costs. At the regional level VR staff participates in Local Workforce Development Area partner meetings in planning for local activities, partner collaboration on referrals, services and shared funding, cross informational training, local area plans and AJC funding, employer services and state and local initiatives. At the state level the VR Services Program administrative staff works closely with TN Department of Labor and Workforce Development (TDLWD) and other core partner staff on integrated customer service planning and data sharing. The VR Services Program aligned its regional boundaries with TN Economic Community Development and TDLWD regions to align VR with local economic, program and service provision planning and development and partner representation. The VR Services Program's Business Services Unit will work closely with the Tennessee Department of Labor and Workforce Development and other partners to develop and implement programs and services for employers. The VR Services Program provides accessibility and accommodation surveys for AJCs to ensure that individuals with disabilities have full access to services and programs.

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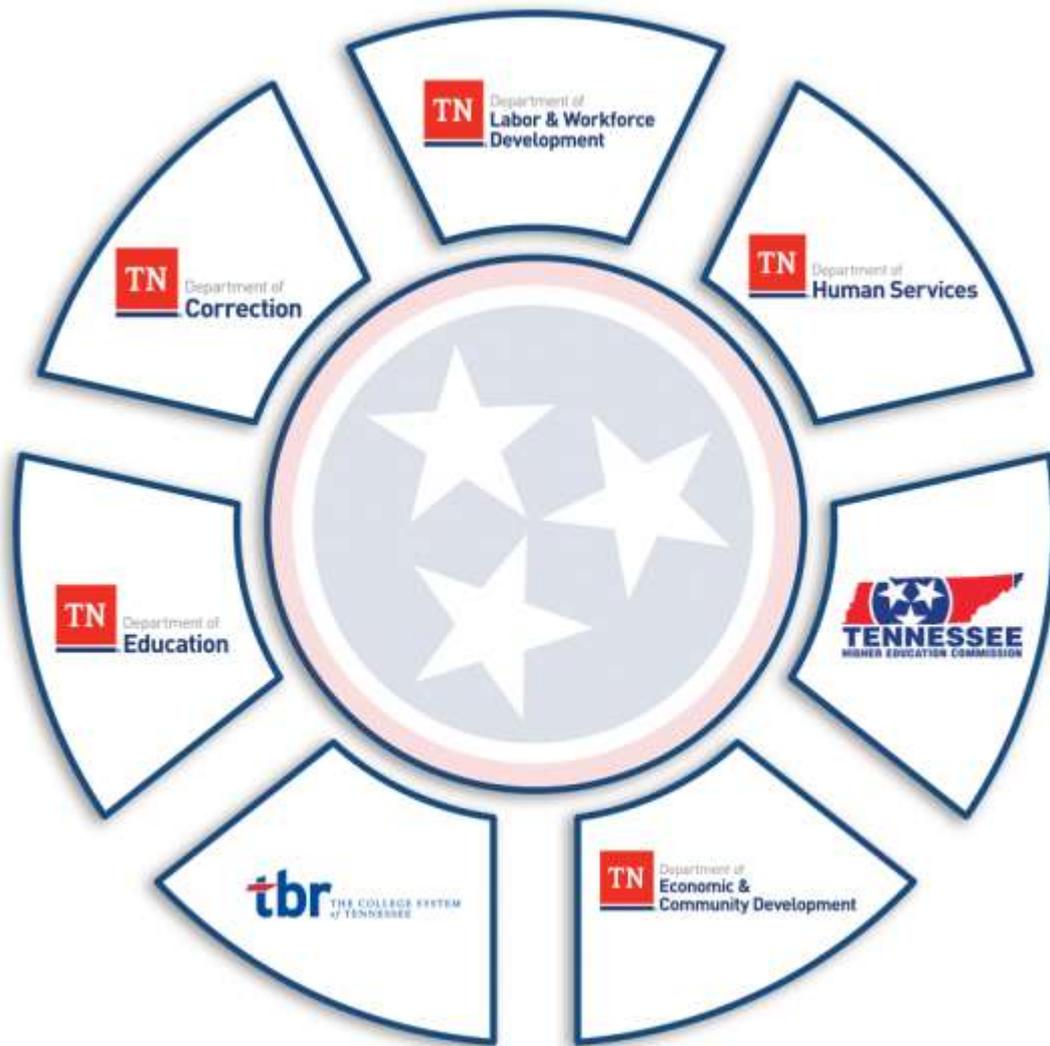


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The Tennessee Workforce Development System

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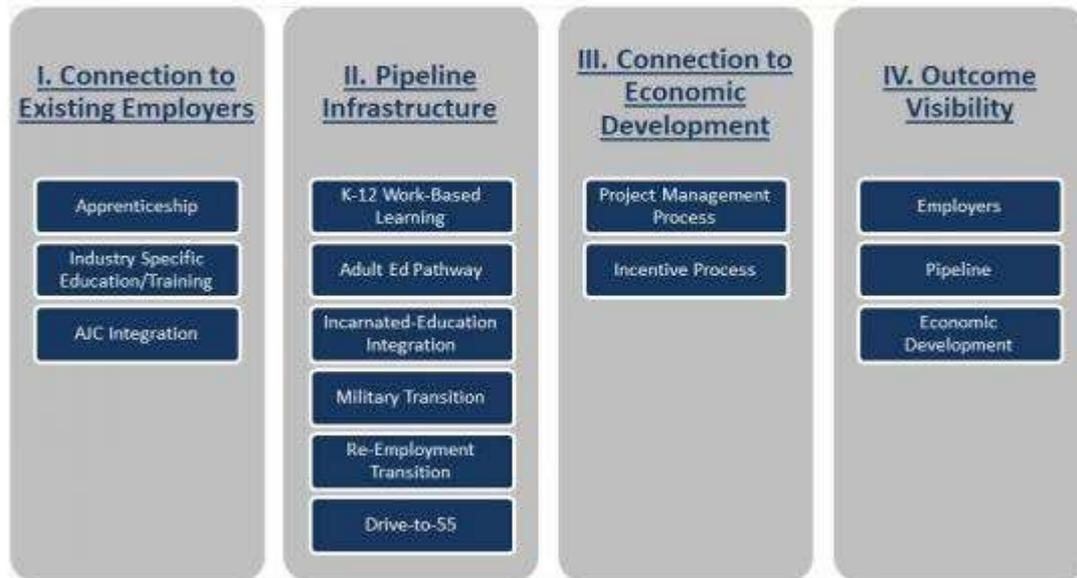


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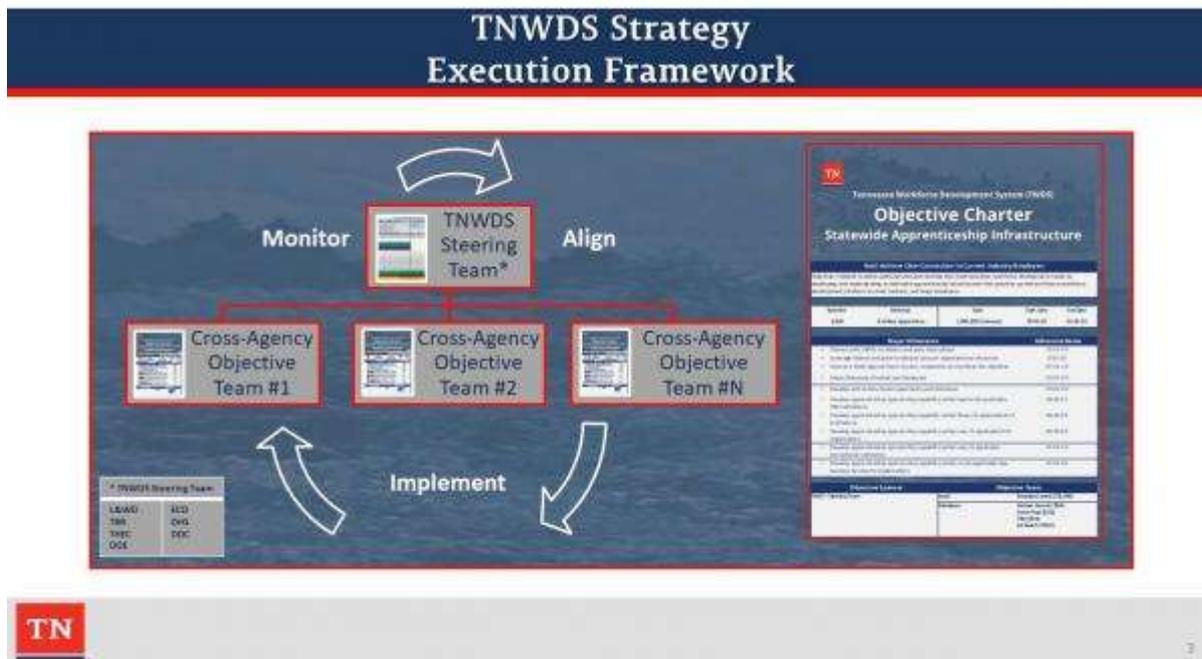


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Under the guidance of the State Workforce Board, clarified in their recommendation to Governor Bill Lee, the Tennessee Department of Labor & Workforce Development has been charged with developing a plan that seamlessly integrates the service delivery of all programs, in order to improve the success outcomes for the Tennesseans that utilize our programs. This primary goal centers on (1) maximizing the co-enrollment opportunity, (2) developing new intake and referral processes across programs, and (3) designing a reporting system to better analyze performance and outcomes.

Connected to the strategy of tighter integration between programs, the State launched a Key Performance Indicator initiative that provides performance and planning resources to the Local Workforce Development Areas (LWDA), across all major programs. The progress thus far has allowed the LWDAs to clearly visualize how all programs can improve performance, as well as conceptualize opportunities to maximize co-enrollment strategies.

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The progress thus far has highlighted how a multi-agency strategy, combined with a value for streamlined program integration, can produce new levels of effectiveness and efficiency. The Re-Employment strategy for TNWDS has provided a space for Title I, Title II, Title III, and Title IV programs begin crafting new procedures, that also incorporate resources from higher education and other public programs.

The ultimate vision is to increase performance for each program individually by adding service capacity collectively through an integrated approach.

*With regard to the integration of TANF within the one-stop framework, including collaboration with other agencies, the TNWDS strategy has integrated TANF and other programs from the Tennessee Department of Human Services to ensure that all co-enrollment opportunities will be highly leveraged. Also, under the guidance of the State Workforce Board, the new approach to streamlining intake services and overall service delivery, leveraging the co-enrollment model, will include the resources available through TANF for participants to remove as many barriers to employment as possible.*

## **TANF**

*The Tennessee Department of Human Services (TDHS) Temporary Assistance for Needy Families (TANF) program has Employment and Case Management Services (ECMS) providers either co-located in the AJCS or have developed an electronic process to ensure cross referrals are being made. The ECMS provider role is to conduct an employment and barrier assessment with customers to determine the most appropriate path the customer needs to obtain sustainable income. TDHS has improved its coordination efforts through increased communication, promotion of cross-program knowledge, and cross-training among frontline staff and other one stop partners to enhance the ability of each program to address the customer needs and questions that may cross program lines.*

## **Adult Education**

*The following is a summary of the Adult Education services available to employers and students. To make these services as effective as possible, the Adult Education program, both from a state-level and locally, will work to align and integrate these program offerings with other WIOA partner programs, including training providers, Vocational Rehabilitation, SNAP E&T, and the Adult, Dislocated Worker, and Youth training programs, to the extent necessary and possible. Adult Education will also seek to provide sufficient quantity of available instructional services to students with SNAP or TANF benefits, in order to meet their education or training requirements.*

### **Career Pathways**

*Adult Education Career Pathway System combines rigorous and high-quality education, training, and other services that—*

- 1. Aligns with the skill needs of industries in the economy of the state or regional economy involved*
- 2. Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including registered apprenticeships*
- 3. Includes counseling to support an individual in achieving the individual's education and career goals*
- 4. Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster*
- 5. Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual*
- 6. Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized postsecondary credential*
- 7. Helps an individual enter or advance within a specific occupation or occupational cluster*

### **Training Services**

*Training services may include:*

- *occupational skills training, including training for nontraditional employment*
- *on-the-job training*
- *incumbent worker training*
- *programs that combine workplace training with related instruction, which may include cooperative education programs*
- *training programs operated by the private sector*
- *skill upgrading and retraining*
- *entrepreneurial training*
- *transitional jobs*
- *job readiness training provided in combination with the services above*
- *adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with the services above*
- *customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training*

#### ***Integrated Education and Training***

*Integrated Education and Training is a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement. The articulated career pathway can include short, moderate, or long term training and education programs to match the ability of different students and include multi-level employment opportunities at different points of certificate or degree attainment.*

#### ***Integrated Education and Training (IET) for ABE Students***

*The IET model combines adult education basic skills instruction, workforce training, and workforce preparation activities concurrently and contextually to increase ABE students' educational and career advancement. In an IET service delivery model, a variety of team teaching strategies are used to deliver the curriculum. Upon completion, it is intended that students will have obtained an industry recognized certificate or credential and will be employable or go on to more advanced training in their chosen career pathway.*

#### ***Integrated English Language and Civics Education (IELCE) for ESOL Students***

*The IELCE model combines ESOL instruction, civics education, workforce training, and workforce preparation activities concurrently and contextually to increase ESOL students' educational and career advancement. In an IELCE service delivery model, a variety of team teaching strategies are used to deliver the curriculum. Upon completion, it is intended that students will have obtained an industry recognized certificate or credential and will be employable or go on to more advanced training in their chosen career pathway.*

#### ***Customized Training***

1. *designed to meet the specific requirements of an employer (including a group of employers);*

2. *conducted with a commitment by the employer to employ an individual upon successful completion of the training; and*
3. *for which the employer pays -*
  - a. *a significant portion of the cost of training, as determined by the local board involved, taking into account the size of the employer and other factors as the local board determines to be appropriate, which may include the number of employees participating in training, wage and benefit levels of those employees (at present and anticipated upon completion of the training), relation of the training to the competitiveness of a participant, and other employer-provided training and advancement opportunities; and*
  - b. *in the case of customized training involving an employer located in multiple local areas in the state, a significant portion of the cost of the training*

**Workforce Preparation Activities**

*Activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education.*

**Pre-Apprenticeship**

*Pre-Apprenticeship is designed to prepare individuals to enter and succeed in an Apprenticeship program. These programs promote a diverse and skilled workforce and prepare participants to meet the basic qualifications for entry into an apprenticeship, through:*

- *An approved training curriculum based on industry standards*
- *Educational and pre-vocational services*
- *Hands-on training in a simulated lab experience or through volunteer opportunities*
- *Assistance in applying to Apprenticeship programs.*  
*Pre Apprenticeship programs involve formal partnerships with at least one Apprenticeship program sponsor.*

**Adult Education Workplace**

*The integration of adult education instruction and workforce training and usually located onsite with location determined by the employer. Adult Education instruction is contextualized for the workplace and skills training.*

**English as Second Language Workplace**

*The integration of ESL instruction and workforce training and usually located onsite with location determined by the employer. ESL instruction is contextualized for the workplace and skills training.*

## B. Alignment with Activities Outside the Plan

Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and

technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

*In Tennessee, we understand that ensuring cohesiveness and alignment across the complex education and workforce development systems will be critical to our long term success as a State. With this in mind, Tennessee Governor Bill Lee outlined a strong vision for Tennessee to develop a comprehensive and overarching workforce development system which braids the work of education and workforce development together. Some of the common elements of this Tennessee Workforce Development System (TNWDS) and the WIOA State Plan which overlap with Career and Technical Education, Vocational Rehabilitation, and Trade are described below.*

*The Tennessee Department of Education (TDOE) is responsible for the implementation of career and technical education (CTE) and administration of support for CTE through the Perkins V State Plan. TDOE and Tennessee Department of Labor and Workforce Development (TDLWD) partner on multiple CTE initiatives working to establish a clear pipeline and infrastructure from education and training to work. One specific example is with Work-Based Learning (WBL). TDOE, through the Perkins State Plan, has a goal to double WBL participation over the next four years. TDOE and TDLWD are continuously collaborating on plans to meet this goal and to provide high-quality workplace education and on-the-job training at the secondary and postsecondary levels. Another example is around the Apprenticeship TN program, where TDOE supports TDLWD on expanding registered apprenticeships in Tennessee. Furthermore, representatives from TDOE and TDLWD also serve on various working groups and advisory councils to ensure CTE implementation is aligned across both departments.*

*The activities provided by the Trade Adjustment Assistance for Workers (TAA) program offer a critical resource for the state's plans to strengthen the workforce system through a highly integrated approach to service delivery. The TAA program has been incorporated in the framework for collaboration in the Tennessee Workforce Development System (TNWDS), as well as new strategies for training activities primarily delivered through work-based learning services.*

*For work-based learning services, the state's apprenticeship team has begun to partner with the staff from TAA to consider strategies to quickly retrain workers that have been trade impacted. With respect to the plans for the TNWDS, the TAA program serves as one of a few resources to develop a new strategy for the state's reemployment services.*

The Tennessee Department of Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program works with stakeholder groups and customer advocacy organizations such as, the Council on Developmental Disabilities, The Arc of Tennessee, Disability rights Tennessee, Tennessee Works, and the State Rehabilitation Council to develop and implement programs and services for individuals with disabilities.

VR and TennCare collaborated on the development and implementation of the Employment and Community First CHOICES (ECF) program that offers services for a person with an intellectual or developmental disability. VR works with community rehabilitation providers (CRPs) to provide specialized and employment services for individuals with disabilities such as supported and customized employment services. The VR Services Program works with the Social Security Administration's Work Incentives Planning and Assistance (WIPA), also known as Benefits to Work, and Ticket to Work programs to help individuals with disabilities who want to work explore options and be informed of incentives available when they go to work. VR provides career counseling and information and referral services for individuals working at sub-minimum wage who may want to advance to competitive integrated employment at minimum wage or higher. The VR Services Program works with secondary school systems to provide pre-employment services for students with disabilities to prepare for transitioning to work our post-secondary training.

VR also partners with Tennessee's Employment First Task Force, a collaboration between public and private partners across the state, to align support, leverage resources, and work together to ensure that people with disabilities have access to education and employment opportunities. Through their strategic plan, the Task Force is aiming to reduce the employment gap for individuals with disabilities by 5% by 2023. Their strategic goals include: aligning the service delivery system and strengthening coordination, building a shared commitment to employment first, increasing the number of employers that hire people with disabilities, making Tennessee state government a model employer of people with disabilities, and preparing students for employment and post-secondary success.

## C. Coordination, Alignment and Provision of Services to Individuals

Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services (e.g. transportation), to individuals, including those populations identified in section II(a)(1)(B), and individuals in remote areas. The activities described shall conform to the statutory requirements of each program.

TDHS improved its coordination efforts through increased communication, promotion of cross-program knowledge, and cross-training among frontline TANF and other one stop partners to enhance the ability of each program to address the customer needs and questions that may cross program lines. This process reduces the passing of customers between programs for answers to basic questions.

The TANF partners are co-located in some of the One Stop Job centers, and a referral process has been established where co-location does not exist. This helps to facilitate a seamless co-enrollment process for TANF customers to ensure customers have access to an extended menu of workforce development and support services.

The Tennessee Department of Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program provides services for eligible individuals with disabilities. Services may include assessments for determining eligibility, training to obtain an educational credential, employment services to assist with obtaining competitive integrated employment that provides economic self-sufficiency and opportunity for advancement and counseling and guidance to facilitate an individual's participation in VR services and in achievement of an employment outcome. Services may also include supported and customized employment, self-employment and specialized services for individuals who are blind or have visual impairments or who are deaf or hard of hearing. VR staff work together with core partners to provide seamless services for people with disabilities through collaboration on referrals, program eligibility, program planning, available services and shared funding, when appropriate.

*The activities provided by required one-stop partners and other optional one-stop partners are a critical resource for the state's workforce system. The state's workforce vision, embodied in the Tennessee Workforce Development System strategy, relies heavily on the service provision of the one-stop partners. With a primary goal of streamlining intake processes and service delivery to improve participant outcomes, the state has centered the majority of the activity integration with one-stop partners on co-enrollment opportunities where participants can receive a variety of services from different agencies and partners through one unified process.*

*Under most circumstances, one-stop partners and other optional one-stop partners are the first point of contact with participants that qualify or need WIOA services. In order to strengthen the integration*

*with our one stop partners to ensure the effective and efficient provision of co-enrollment services, the Tennessee Department of Labor & Workforce will leverage existing case management system to add any necessary modifications that will better inform one-stop partners of co-enrollment opportunities for participants. Additionally, the agency recently implemented a Key Performance Indicator project which offers Local Workforce Development Agencies vital and timely participant performance information to aid in planning and service improvement. These two approaches to strengthening the partnership with one-stop partners, along with other existing resources, serve as the primary core framework for integrating service delivery in a comprehensive manner.*

## D. Coordination, Alignment and Provision of Services to Employers

Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs and to achieve the goals of industry or sector partners in the state. The activities described shall conform to the statutory requirements of each program.

The Tennessee Department of Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program Business Services Unit (BSU), formed in 2016, partners with stakeholders in the workforce system in order to meet the current and projected workforce needs of employers. In order to serve employers in achieving their industry and sector goals in the state, the VR BSU partners with the Department of Labor and Workforce Development's American Job Centers and their regional Business Service Teams. Consultants from the VR BSU partner with employment specialists from the Department of Corrections, Veteran's representatives, training and educational institutions, and members from local Chambers of Commerce to align efforts for supplying a skilled and talented workforce in local communities. Through their involvement in the regional Business Service Teams across the state, the Consultants of the VR BSU can work collaboratively with partners from across WIOA core programs and beyond to identify opportunities for meeting the workforce demands of local employers and industry sectors. The VR BSU is in the process of reorganizing and expanding their capacity to optimally serve rural and urban customers.

## E. Partner Engagement with Educational Institutions

Describe how the State's Strategies will engage the State's community colleges and area career and technical education schools, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv).

As part of its partner engagement with educational institutions, The Tennessee Department of Labor and Workforce Development (TDLWD) is involved in collaboration with the Tennessee Higher Education Commission (THEC), Tennessee Department of Education (TDE) and the Tennessee Board of Regents (TBRs) to focus on career and technical education, work-based learning and career pathways. Each of these entities works closely with the State and local workforce development boards to develop training and support for emerging workforce demographics through our 27 Tennessee Colleges of Applied Technology (TCAT) and 13 Community Colleges across the State. The entities work to assist in recruiting industries, retraining displaced workers, assisting with plant closings, and introducing youth to post-secondary career options/program to meet the States workforce needs. The pipeline to serve our clients and better meet the industry needs is maintained through constant communication. Another program that cooperatively increases alignment and promotes job-driven education is the workforce 360 program; which can bring workforce, education, and employers under one roof to discuss achievable strategies.

Tennessee is also expanding programs of study that bring together a sequence of career-focused courses that start in high school and extend through college and have grown in their availability and connectivity to emerging occupations. Similarly, Tennessee Pathways is another program that provides multiple pathways to high skill/high wage employment for high school students to earn “dual credits” for both high school and college for easy transfer to two-year or four-year institutions.

Governor Lee’s Goal 4: Clear Data/Reporting, II Pipeline Development, and III Integration with Economic Development, is guiding the WIRED Division in its development and enhancement of labor market information for the workforce partners and the public. Annually WIRED provides information on the top statewide demand occupations, skill gaps, and programs of study with a surplus of completers to THEC for the Academic Supply and Occupational Demand report due to the Tennessee legislature on January 15. The Tennessee Department of Economic and Community Development (ECD) provided some additional regional information on demand occupations for the report to THEC. With a goal of working toward common measures and greater visualization of employer requirements and student outcomes, THEC, ECD, and TDLWD WIRED Division staff met in the spring of 2019 to review measures developed by ECD and WIRED. Both ECD and WIRED continue to adjust their measures to use more local and real time data sets.

The Governor’s GIVE program received more than 60 grant applications from community college, Tennessee College of Applied Technology, local education agency, and employer teams who applied for up to \$1 million in funding to enhance and collaborate on career and technical education programs in their communities. Extra points were received in grant scoring if designated distressed or at risk counties were included in the collaborations. TDLWD WIRED staff participated in the scoring of applications which included metrics on best use of labor market information (LMI) from the Academic Supply and Occupational Demand report, jobs4tn.gov LMI, and other credible LMI sources. In the grants, educational institutions described ways they planned to recruit students into programs of study where data indicated skill gaps exist in their communities.

TDLWD continues to work with THEC on enhanced LMI measures and visualizations for the Academic Supply and Occupational Demand product for the public and legislators. Also, the Tennessee Department of Education, College, Career, and Technical Division, is a rich source of information on industry certifications matched to their programs of study. They provide this information to their local education agencies and are researching the availability of additional data from certifying agencies. TDLWD is providing their information on “Tennessee Promoted Industry Certifications” to the local workforce boards through the workforce planning process. TDLWD LMI previously provided data on apprenticeship completers in the state to TDOE which allowed them to successfully compete for funding in this area. TDLWD also assisted in designing record layouts so TDOE career and technical completer data could be added to the P-20 data warehouse and allow their student data to be matched to wage records for follow-up information.

## F. Partner Engagement with Other Education and Training Providers

Describe how the State’s Strategies will engage the State’s other education and training providers, including providers on the state’s eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.

The State is regularly working on the strategies to engage with other education and training providers, especially the statewide Eligible Training Provider List (ETPL) which is a program providing choices to WIOA participants. The local boards in each workforce area are working with providers to ensure that they have the correct training programs developed and approved to meet the needs of employers. The Local area is helpful in identifying Eligible Training Providers (ETPs) for skills panels that will work to analyze skill gaps and identify resources for growth in localized industrial clusters.

Another way the state is engaging with other Education and training providers is by promoting the role of the Community and Technical Colleges in the growth of our economy. For instance, in order to meet the workforce training needs, these 40 colleges provide short term and long term training programs and have developed innovative strategies with the local, regional and State employers. Additionally, Adult Education, Vocational Rehabilitation, and Career & Training Education (CTE) are training programs that continuously providing beneficial services to participants with significant barriers to education, training, and employment. Through continued collaboration, the educational partners are able to offer workforce development programs, and provide training for industries and small businesses. The following are the partners that the colleges work closely with to fulfill the state's goals:

- Tennessee Department of Labor & Workforce Development
- Tennessee Department of Economic & Community Development
- Tennessee Small Business Development Center Tennessee Department of Tourist Development
- Tennessee Department of Education

## G. Leveraging Resources to Increase Educational Access

Describe how the State's strategies will enable the State to leverage other Federal, State, and local investments that have enhanced access to workforce development programs at the above institutions, described in section (E).

As described above, the State will continue to use the workforce development system partnerships to ensure all resources are leveraged successfully for participants in attaining their educational goals. In addition, the State's "Drive to 55" initiative offers strong support for increasing educational access through TN Promise, TN Reconnect and LEAP grants. Finally, to increase educational access, the state will increasingly use all workforce programs WIOA, TAA, Vocational Rehabilitation, Pell Grants, public and private grants, and other resources to assist participants in achieving their education and employment goals.

Tennessee will work across agencies to provide a wide range of supportive programs targeted to enhance access to educational institutions and their occupational and vocational training programs. Examples of such programs include:

- Administering the Carl D. Perkins Career and Technical Education grant for Tennessee. Educational institutions can request Perkins program improvement funding for activities to prepare special populations for high skill, wage, or demand occupations that will lead to self-sufficiency.
- High school seniors in Tennessee may apply for the Tennessee Promise scholarship, which will provide two years of tuition-free attendance at a community or technical college in Tennessee. Tennessee Promise is a last-dollar scholarship, meaning it will cover the cost of tuition and mandatory fees not met by Pell, Hope or the Tennessee Student Assistance Award. As part of the program, students will be paired with a partnering organization, provided with a mentor who will support them during the college application process, and complete the community service requirement.
- Implementation of the Tennessee Reconnect Grant may also be used at Tennessee community colleges and some four-year institutions to pay for tuition while earning a two-year associate degree. This grant pays the remaining balance after other state financial aid and

Pell Grants have been applied towards tuition and mandatory fees at the community college. At a four year institution, the Tennessee Reconnect Grant will not be last-dollar, meaning it will not cover all tuition and fees. The amount of funding you may receive will be based on the average amount of tuition and fees at a community college.

- Drive to 55 was created to ensure at least 55 percent of Tennesseans have a college degree or certificate by 2025 and can access more career opportunities in their communities across the state. Tennessee Pathways supports alignment among K-12, postsecondary, and industry to provide students with relevant education and training to jumpstart their postsecondary degrees and credentials. Students, with their certificate, degree or credential, can transition seamlessly into the workforce and contribute to the success of our economy.
- The Tennessee Department of Correction (TDOC) educational system is fully accredited by the Tennessee Department of Education to ensure the highest level of education. TDOC provides an array of academic and career technical programs, as well as library services at each of the state correctional facilities. A team of dedicated, highly qualified teachers who hold valid Tennessee teacher's licenses, some of whom are also certified and licensed by the National Center for Construction Education and Research (NCCER), provide instruction for incarcerated offenders in Adult Basic Education (ABE) and Career and Technical Education (CTE). TDOC partners with Tennessee Higher Education Initiative (THEI) and Lipscomb University to offer classes at two male facilities and one female facility leading to a general education certificate, associate's degree, bachelor's degree, or master's degree. TDOC also partners with the Tennessee Department of Labor and Workforce Development (TDLWD) to provide high school equivalency testing for incarcerated individuals. The goal is to provide incarcerated offenders with education and career training as part of the broader effort to increase public safety and reduce recidivism.
- Work-based learning (WBL) is a proactive approach to bridging the gap between high school and high-demand, high-skill careers, providing students with the needed skills that are difficult to learn solely through classroom-based instruction. WBL activities begin by helping students develop a broad understanding and awareness of industries and possible careers that are available to them. Over time, these experiences narrow in focus as students find careers of interest, learn what postsecondary education is necessary for success, and practice the technical, transferable 21st century skills, and social and personal skills to enter those careers later in life. Collaboration between private and public institutions ensures relevant skill development and clear pathways to student success. Work-based learning is a methodology that can support learning for all students through various strategies. Successfully braiding the components of school and work and providing work-based learning opportunities for all students requires a vision and commitment shared by stakeholders including educators, employers, communities, parents, and the students themselves. The Tennessee Department of Education's policies support WBL programs that prepare students for success in local high-wage, high-demand, and high-skill careers through rigorous, relevant WBL experiences driven in partnership by the business community and schools. These experiences may begin with broad exploratory activities as early as elementary school, when students are first becoming aware of what adults do in the world around them. Over time, these experiences become more customized and specific to the interests and needs of the students. Ultimately, more students will have the opportunity to participate in and benefit from high-level, capstone WBL experiences such as internships and apprenticeships that prepare students for postsecondary degrees and employment.
- The state's Apprenticeship and Pre-Apprenticeships strategy will be kicking off with full implementation in January 2020. Labor and Workforce Development is partnering with Tennessee Board of Regents to increase sponsors of Apprenticeships programs at both the

Tennessee Colleges of Applied Technology (TCATs) and Tennessee's 13 Community Colleges Across the state. By growing Apprenticeship programs throughout the state, in both traditional and non-traditional occupations, individuals are given the opportunity to earn while they learn. These programs ensure individuals living wages while they progress through the educational components of their certifications and/or degree program. Not only do apprenticeship programs provide access to education they enable individuals to achieve an education without the accumulation of debt.

Strong collaboration and engagement across agencies is critical to achieving those goals, and there is a shared commitment within state agencies, the Governor's office, and the state legislature to ensure collaboration works to achieve the best outcomes for Tennesseans.

Governor Lee's GIVE grants funded by the state legislature which designate priority points for distressed and at-risk counties are awarded to educational institutions. Local workforce agencies are collaborating on advisory and governance committees in several areas applying for these grants and can assist in leveraging these funds, as well as ECD LEAP grants, with other workforce services. They also can assist in working with the educational institutions, employers, and others in the related industry sectors to insure sustainability of GIVE grants in future years, and recruit populations with barriers into these programs.

## H. Improving Access to Postsecondary Credentials

Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including Registered Apprenticeship certificates. This includes credentials that are industry-recognized certificates, licenses or certifications, and that are portable and stackable.

The state will continue to work to improve access to postsecondary credentials by focusing on high school diploma or equivalency attainment. This will be accomplished by ensuring that participants who lack a high school diploma are referred to Adult Basic Education (ABE) for services. This will enable many participants to be introduced or reconnected to the education system and improve their access to postsecondary credentials. In addition, the state will utilize a demand-driven system to identify which training programs lead to credentials that are essential to business' needs. This includes providing interested employers with information about the Apprenticeship Assistance Training Grant to help with the Registered Apprenticeship certifications across the State. Each of these activities will improve access to postsecondary credentials in the State. Industry certifications can be stackable credentials such as Microsoft Office Suite certifications as identified with the Office Management program of study. Another method of discerning which certificates and licenses are demand-driven is to identify those which are related to occupations in demand using the Department of Labor and Workforce's supply and demand analysis. Additionally, the Department of Education has an industry certification policy for high school students that promote certifications, vetted by Tennessee industries; the student should be able to attain these certifications after the completion of a program of study in one of the 16 career clusters. The approach taken to align industry certification is designed to ensure that students are presented with viable seamless learning pathways. This designed approach contains three main goals:

- An increase in student attainment of department-promoted industry certifications
- An increase in student transference of department-promoted industry certifications to meaningful postsecondary and workforce opportunities following high school graduation
- Provision to ensure consistency in the promotion of all department-promoted industry certifications with various stakeholders.

Tennessee will promote the attainment of postsecondary credentials in a number of ways and through partnering with WIOA boards to secure funding. Examples include:

- Tennessee recognizes apprenticeships are a proven work-based learning strategy connecting individuals to a career pathway. In July 2019 Tennessee was awarded the ApprenticeshipUSA State Expansion Grant (\$1.4M). Funding from this grant provides the means to build an infrastructure to support the expansion of apprenticeships in Tennessee with the overall purpose to grow and expand apprenticeships throughout the state which in turn leads to a nationally- recognized industry credential that is both portable and stackable. Tennessee's strategy is focused on building apprenticeships in both traditional and non-traditional fields. With the grant funding Tennessee will launch the ApprenticeshipTN website which will serve as an avenue to connect established registered apprenticeship programs to individuals seeking employment. In addition, Tennessee will educate employers on building registered programs and the benefits of apprenticeship programs. The resources under this initiative will work with employers, educational institutions, and training providers in unique ways to accomplish increases in both the number of registered apprenticeship programs in the state as well as the number of apprentices into new or already established programs.
- In an effort to continue to expand and market Registered Apprenticeship as a post- secondary option for students, the Labor and Workforce Development will partner with another state agency to support pre-apprenticeships in the high school sector. This effort focuses on the development and readiness for high school graduates to enter a registered apprenticeship program. In addition, in some cases, it will allow a high school student to earn post-secondary credentials at the same time as earning their high school diploma.
- Tennessee will partner with Tennessee Board of Regents on the Drive to 55 initiative to ensure 55 percent of Tennesseans have a college degree or certificate by 2025 and can access more career opportunities in their communities across the state. Tennessee Pathways supports alignment among K-12, postsecondary, and industry to provide students with relevant education and training to jumpstart their postsecondary degrees and credentials. Students, with their certificate, degree or credential, can transition seamlessly into the workforce and contribute to the success of our economy.
- All training providers will be encouraged to seek inclusion on the State Eligible Training Provider List which will require them to describe the credential(s) to be earned.

Tennessee Reconnect helps adults enter higher education so that they may gain new skills, advance in the workplace, and fulfill lifelong dreams of completing a degree or credential. As part of Tennessee Reconnect, all TANF providers are encouraging customer enrollment in one of our twenty-seven (27) Tennessee Colleges of Applied Technology (TCATs) to obtain and/or finish their degree or certificate. TANF partners assist customers in filling out applications to educational entities and Free Application for Federal Student Aid (FASFA) applications. The TANF provider staff have been trained on how to assist customers in navigate the financial aid opportunities with Tennessee Reconnect. TANF providers also have staff that work with customers to assist them in mapping out a plan that best suits their end goal desires.

The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program is aligning career pathway services with other partners to help individuals with disabilities enter or advance within a specific occupation or occupational cluster through registered apprenticeships. The VR Services Program's Business Services Unit will work closely with the Tennessee Department of Labor and Workforce Development and other partner subject matter experts to assess and identify apprenticeship programs across the state in order to identify potential

VR customers who can participate in apprenticeship training that will lead to economic self-sufficiency.

The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program operates the Tennessee Rehabilitation Center (TRC) – Smyrna, a comprehensive vocational rehabilitation training center. On July 22, 2019, the TRC - Smyrna transitioned from a program-based model to a new Career and Technical Education (CTE) design to enhance the overall service delivery process and better align the Center with the WIOA Primary Indicators of Performance in the areas of Credentialing and Skills Gains. As a result of the Center's transformation, students are no longer required to participate in a specific program with designated beginning and end dates. Students now choose an Area of Study with classes offered based on an individualized schedule. On a quarterly basis, students attend day and/or evening classes and can enroll in prerequisite, required, or elective classes based on their interests, skill development needs, and Area of Study requirements. All curriculums have also been enriched to have a greater emphasis on work-based learning and community integration through required volunteer, practicum, and internship opportunities with business and industry. Upon completion of all courses, students receive a certificate of completion and have the option to take an exam to receive a national credential in their Area of Study.

TRC Smyrna offers 9 Areas of Study that provide opportunities to obtain national certifications and licenses that are industry-recognized, portable, and/or stackable. In addition, students can enroll in an Entrepreneurship Area of Study to learn how to start and operate their own business after obtaining their certification. The Center is completing the final year of a 3-year strategic plan that includes objectives and action steps to improve access to and increase enrollment in apprenticeship programs and is currently working with one of its national partners, CVS, to develop pre-apprentice programs that could lead to registered apprenticeship certificates for TRC students. The following provides a brief overview of the Areas of Study and associated credentials where applicable:

### ***Automotive Detailing Technician***

The Automotive Detailing Technician Area of Study prepares students for employment in the automotive services industry. Students are trained from the I-Car curriculum which includes courses in paint correction, buffing, polishing, and refinishing of body panels. Upon completion of all courses, students can obtain a nationally recognized credential in Auto collision and Repair.

### **Automotive Maintenance & Lubrication Technician**

The Automotive Maintenance Area of Study prepares students for employment in Fast Lube Businesses, Automobile Dealerships, Rental Car Outlets, Large & Small Automobile Garages, Tire Companies, and Vehicle Manufacturers. The Automotive Service Excellence (ASE) curriculum is used to teach skills in oil and filter replacement, four-wheel alignments, wheel balancing services, brake service, repair tire servicing, and light engine and transmission work. Students may take an exam to obtain certification from the National Institute for Automotive Service Excellence (ASE) upon graduation.

### **Business Education Technology**

The Business Education Technology Area of Study introduces students to professional clerical and office opportunities. Students are trained in specific office tasks and office procedures, and skills positions in a broad range of clerical and office related positions, including receptionist, office clerk, secretary, and administrative assistant. Graduating students can obtain a national certification as a Microsoft Office Specialist and receive additional certifications through Office Proficiency Assessment & Certification (OPAC).

### **Certified Logistics Associate/Technician**

The Certified Logistics Associate/Technician Area of Study is designed to prepare students with skills and knowledge for a career in the logistics work environment. Students will be prepared for employment with companies that have implemented a team-oriented design, safety principles, lean principles, supply chain logistics, and sustainable practices within the manufacturing environment. Upon completion of this area, students will be able to explore job opportunities in this industry, including shipping and receiving clerk, conveyor work, and quality standards examination in warehouses and manufacturing plants. Students can obtain national certification as a Logistics Associate and an advanced Logistics Technician certification as a stackable credential through the Manufacturers Skills Standards Council (MSSC).

### **Certified Production Technician**

The Certified Production Technician area of study will offer students an introduction to Safety, Quality, Manufacturing Operations and Maintenance Awareness, as these topics relate to employment in the manufacturing industry. This credential will prepare students for positions in manufacturing including Production Helper, Production Technician, Machine Operator and Assembler. Students who demonstrate mastery of the core competencies of advanced manufacturing production can obtain credentials as a Certified Production Technician through the Manufacturers Skills Standards Council (MSSC).

### **Customer Care**

The Customer Care Area of Study trains students to obtain a position in a variety of customer service settings and jobs. Students will learn skills including product handling, stocking, ordering, inventory, money handling and operating point-of-sale equipment, creating displays, and customer service. This training will prepare students for positions in customer service, including call center representative, information clerk, customer service representative, and/or retail associate and greeter. Students who qualify can take the National Retail Federation Foundation Certification exam.

### **Food Service**

The Food Service Area of Study will offer students an introduction to the professional food service industry. Students will be introduced to workplace safety as well as sanitation & hygiene in a food service establishment. Upon completion in this area, students will be able to display skills applicable to this area such as safety, dining area work tasks, dishwashing operation, food identification, food preparation, and bakery operations. Students can obtain the certification administered by the National Restaurant Association as a ServSafe Manager.

### **Power Equipment**

The Power Equipment Area of Study will introduce students to workplace and equipment safety on the Forklift, Stock Picker, and Power Pallet Jack. Upon completion of this Area of Study, students can obtain OSHA Forklift Certification and will be able to explore job opportunities in this industry including warehouses, lumber yards, manufacturing plants, farm supply stores, and food outlets.

### **Pharmacy Technician**

The Pharmacy Technician Area of Study trains students to assist licensed pharmacists in providing medication, medical devices or products, and customer service to patients. Pharmacy Technicians may also perform tasks related to preparing or compounding medications, communicating with physician offices or insurance companies, and other administrative pharmaceutical duties. Jobs can be found in retail, hospitals, mail order, and specialty pharmacies. Key skills gained include insurance verification, payment processing, inventory tracking, ordering, prescription filling, quality control, medical data entry, and coding. Upon completion of this Area of Study students can take the exam to become a Certified Pharmacy Technician (CPhT).

Tennessee has a reverse referral process in which individuals that are enrolled in TCATs and community colleges can be referred to the SNAP E&T program. This will allow SNAP recipients to gain the necessary skills and credentials to obtain self-sustaining wages. E&T education activities directly enhance the employability of the participants; there is a direct link between the education activities and job-readiness.

## I. Coordinating with Economic Development Strategies

Describe how the activities identified in (A) will be coordinated with economic development entities, strategies, and activities in the State.

The strategic realignment of the workforce development regional directors in accord with the TNECD Job Base Camps creates a seamless connection of economic and workforce development activities. In addition, the partnership through Workforce 360 encourages alignment and coordination of recruitment, training and placement of qualified candidates. The talent recruitment process continues with pre-screening, assessment and testing, interviewing, and pre-hire training. Tennessee American Job Centers provide assistance with the following services:

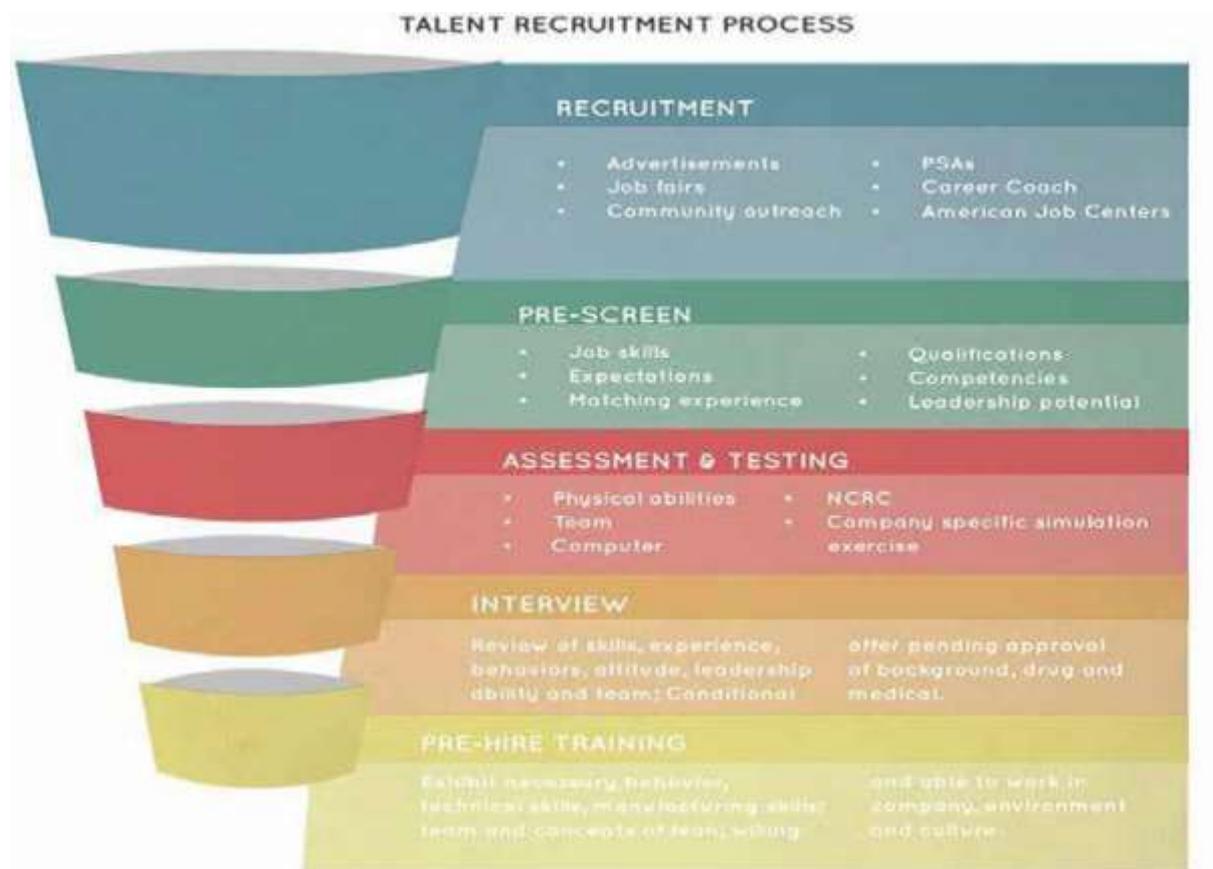


Figure 3A – TN Talent Recruitment Process

Each department has defined and relevant roles in stimulating growth across the state, however, it is in the transformed partnerships that TDLWD and TNECD have found renewed success. The Governor’s Workforce Subcabinet, the State Workforce Development Board, Pathways TN and several other aforementioned committees and initiative coordinate labor and economic development entities, strategies and activities on both the State and local level. Additional economic development activities and services include:

### **Business Enterprise Resource Office**

Under the auspice of TNECD, the Business Enterprise Resource Office (BERO) serves as a voice for and advocate of economic inclusion for Tennessee's disadvantaged businesses (DBE). The office is tasked to analyze, disseminate and promote best practices and access to capital for DBEs to service providers. It also reports on the status of DBEs across the State. For the purposes of BERO, DBE refers to businesses owned by women, minorities, Veterans and persons with disabilities and businesses operating in remote or rural areas of Tennessee.

With the launch of a new website in 2015, BERO now has an updates platform and its website that allows easy access to BERO's target audience to present: policy and procurement information for DBEs and small businesses; topics for youth entrepreneurship; information on grants; and information about general resources for service providers.

One featured section of the new website is "Topics for Economic Inclusion", which highlights various policy and procurement information for DBEs. Such information can be:

- Entrepreneurs with Disabilities: Programs and Resources
- Minority Business Enterprises, Women Business Enterprises; Veteran Business Enterprises: Policy and Procurement
- Rural Businesses: Policy and Financing
- Youth Entrepreneurship: Programs and Opportunities

Additional resource links provide information about State and Federal resources, grant opportunities and services providers (businesses and communities). The two following resources are:

#### 1. *Tennessee Smart Start Guide*

The TN Smart Start Guide, a startup and small business guide, is published and distributed along with a paired postcard in both digital and hard copy formats. The guide gives an overview of a broad base of relevant topics from legal structure to financing to procurement.

The guide is distributed through TNECD's nine regions and its resource partners and stakeholders. These include but are not limited to, elected officials, chambers of commerce, development districts, state agencies (such as the Office of the Small Business Advocate, Revenue, Secretary of State, Human Services and Labor and Workforce Development), UT-CIS, TN Small Business Development Centers, the US Small Business Administration, USDA Rural Development, SCORE, AEO, the Federal Reserve Banks of Atlanta and St. Louis, business incubators and accelerators, and many others. Averaging 1,700 page views per week, the guide has been recognized nationally as a best practice resource.

#### 2. *How to Start a Business*

This portion of the website provides a simplified step-by-step guide to registering a business in Tennessee and is part of a larger push to make registering a business in the state easier. A general checklist for business registration includes the following steps, 1) choosing a name, 2) determining a legal structure, 3) taxes, 4) hiring employees, 5) licensure requirements, 6) key resources, and 7) links to the TN Smart Start Guide and the PDF of the flowchart.

#### ***Main Street: Business Promotion and Technical Assistance***

The Tennessee Main Street Program serves as a statewide resource for communities seeking to revitalize and manage their traditional downtowns. In partnership with the National Trust for Historic Preservation's National Main Street Center, this program serves the 28 designated Main Street

Communities across Tennessee. In 2014, these 28 communities reported reinvestment statistics that included 1,565 net new jobs, 171 net new businesses and a combined public/private investment of \$95.5 million within their program districts.

A list of additional TNECD Affiliated Programs follows:

### **Regional Entrepreneurial Accelerators**

The State's Launch TN accelerator program is designed to assist promising entrepreneurs with the resources necessary to propel their companies along the spectrum of business growth and job creation. Accelerators are located throughout the State with the goal for them to become foundational components in each region's economic development strategy; conjunction with creating a network of partnerships and mentors within the local business community, the statewide investor base, higher education, non-profits and government. The grant funding is a combination of State and Federal dollars and is contingent on each accelerator providing local matching support. Regional accelerators have hosted over 475 entrepreneurial events, engaged over 400 mentors and accelerated over 122 companies statewide.

### **Tennessee Rural Opportunity Fund, Small Business Jobs Opportunity Fund and Energy Efficiency Loan Programs**

The Tennessee Rural Opportunity Fund (ROF), a rural economic development fund, was launched in 2008; and in 2010 the Small Business Jobs Opportunity Fund (SBJOF) was launched. The funds were created through a partnership between the State of Tennessee, the Tennessee Bankers Association and Pathway Lending, a not-for-profit community development financial institution, also referred to as a CDFI. ROF provides loans and technical assistance to small, disadvantaged and early-stage businesses in rural Tennessee and the SBJOF provides loans of up to \$2.5 million to small businesses statewide. The Tennessee General Assembly approved a \$1.25 million appropriation directed through TNECD; \$10 million for ROF; \$10 million for the \$25 million SBJOF.

## **b. State Operating Systems and Policies**

The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in section **II Strategic Elements**. This includes—

(Please see subsequent entries for responses to specific areas of this section.)

**1. The State operating systems that will support the implementation of the State's strategies. This must include a description of—**

**A. State operating systems that support coordinated implementation of State strategies (e.g., labor market information systems, data systems, communication systems, case-management systems, job banks, etc.)**

Tennessee's web-based Virtual One-Stop System (VOS) is the most advanced and comprehensive statewide workforce development information and reporting system available today. Using a set of

core proprietary software components created by Geographic Solutions Inc., the department and its partners have modernized and integrated workforce services into a single computing platform referred to as Jobs4TN. This system will allow for a coordinated implementation of our state strategies. Having data integrated in the same system allows for better program communication which leads to better reporting and customer service.

One of the main objectives of Tennessee's Workforce System is to connect workforce development with job creation and growth; so a major tool intended to achieve and maintain this relationship is our data and case management system. For this reason, TDLWD launched Jobs4TN in December 2014. Developed by Geographic Solutions, Inc., this system is user- friendly and extremely helpful for the general public and our staff. The major functionalities of Jobs4TN are:

- Self-Service for Job Seekers
- Self-Service for Employers
- Labor Market Information
- Mediated Labor Exchange
- Case Management through Virtual One-Stop System (VOS)
- Performance Reporting and Flexible Ad Hoc Reports
- Individual Fund Tracking

These functions provide integrated and secure, web-based applications hosted by Geographic Solutions, Inc. They are also password protected and have role-based security for local and state level staff. They provide, in addition, full, statewide metrics and streamlined participant data as well as performance reports just for the unique local areas and all AJCs.

In addition to the multi-level functionality of Jobs4TN, Workforce One-Touch streamlines the agility and connectivity of business management and customer service ticketing systems utilized by TDLWD. This system exists with the following goal, strategy, and objectives in mind,

- **GOAL:** collect real-time customer data upon which evidence-based TDLWD policies can be structured and continuously improved while measuring customer performance and accountability.
- **STRATEGY:** develop multi-agency collaboration and accountability for the effective delivery of services reflective of State workforce and education customer service outcomes.
- **OBJECTIVE:** increase customer service data sharing across State agencies through an agreed-to standardized process that includes the creation of standardized customer profiles and ticket forms.

Workforce One-touch has revolutionized Workforce System communication and management resulting in transformational results across Tennessee. Below are some highlights of the success of the system:

A major feature of Workforce One-Touch is Zendesk, a multi-channel customer service tool that streamlines communications throughout the Department. This system allows TDLWD to store all support questions and requests in one place for staff assistance and reference. Within assigned groups or divisions in the system, staff can quickly respond to businesses and customer requests for assistance or easily assign the request to the appropriate staff member. The ease in sharing such requests allows the Department to render quicker, better customer service. It also provides a record

of progress for various communications to increase collaboration and streamline all responses. Finally, this system provides customer service and satisfaction metrics to support workflow improvements and increase efficiencies across the board.

In addition to coordinated request responses, Zendesk also includes a live-chat feature, Zendesk Chat. Advantages of this feature include:

- Proactive engagement - initiate a chat with a customer who may need help
- Customer convenience - chat is a fast way to provide customer service in real time
- Agent productivity - reach more customers by easily managing multiple chats. Zendesk Chat also offers helpful features including:
  - Triggers that automatically send out a chat or message to visitors on specific pages of the Department's website.
  - Agent-to-agent chat for team collaboration in real time
  - Automatic translations of chat conversations
  - Shortcuts that speed up chat conversations
  - The ability to route chats to specialists

The Tennessee Department of Human Services (TDHS) – Vocational Rehabilitation (VR) is under contract with Alliance Enterprises, Inc. to replace VR's current legacy case management system, TRIMS, with a new system, Aware, that is federally compliant and supports the changes required by WIOA. The new system will provide staff with a more efficient, user-friendly system that supports WIOA reporting requirements and a variety of vocational rehabilitation program case types, including traditional VR cases, Independent Living (IL) cases, Independent Living Older Blind (ILOB) cases, Potentially Eligible (PE) cases, and allows for staff of Community Tennessee Rehabilitation Centers (CTRCs) and TRC Smyrna to access and store essential case information in one comprehensive case management system.

## **B. Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers**

Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers.<sup>10</sup>

[10] For the PY 2016 state plan, descriptions of data collection and reporting processes need only include currently known indicators.

Our goal is to carry out all data-collection and reporting processes under this plan using a single virtual system, specifically, the Jobs4TN system which is being deployed by Geographic Solutions, Inc., TDLWD's system of record for workforce data across all core programs. And to the extent possible, recognizing cost and infrastructure limitations, also to be deployed for certain mandatory and optional partners as WIOA take shape in the future.

The department's web-based Virtual One-Stop System (VOS) is the most advanced and comprehensive statewide workforce development information and reporting system available today. Using a set of core proprietary software components created by Geographic Solutions Inc., the

department and its partners have modernized and integrated workforce services into a single computing platform referred to as Jobs4TN. Working from the WIOA statutes, we have moved forward with establishing needed data points in our systems and continually work with our vendor to collect required data as the reporting requirements continually change. *The system was created to collect participant level data that is needed to create the federal reporting file called the PIRL (Participant Individual Record Layout). As participants receive services from our system they are entered into the jobs4tn system where that information is housed in certain individual record tables. Once we have collected the social security number of a participant that was a participant of a program that social security number is then matched with wages from our Tennessee state unemployment wage records and also combined with SWIS wage records and then stored into the system. Every quarter we pull an extract of the participants that were served for that rolling 4 quarter period and submit a SIRS file to the US Department of Labor. That file then goes through numerous edit checks and validation to ensure accuracy of the report.*

The VOS component library as implemented in Tennessee is modular in design and new or existing Web components will be easily added or modified. For example, the system incorporates robust modules for:

- Job Seeker and Employer Self Service
- Title I, Title II, Title III, Title IV (in December 2016), as well as Trade, SNAP, and RESEA Case Management Modules.
- Unemployment Insurance
- Virtual Recruiter for Employers
- Labor Market Information, including Demand Occupations by LWDAs
- Labor Force Information by County, Region, and Statistical Area
- Tennessee Training Providers
- Adult Education

The system also creates and deploys expansive, workforce administrator and manager tools and virtual functionalities such as:

- Accountability and Dashboard Modules for Management
- Fund Management Tracking and Reporting
- Managed Employment Services
- Statewide and Partner Case Management
- Follow-Up and Outcomes Tracking
- National Data Sharing Interfaces
- Trade-Affected Worker Module
- Rapid Response to Layoff Module

VOS also enhances user practical knowledge by making available state-of-the-art, online assessments, as well as outcome tracking of Aptitude and Basic Skills tests, which are easily

recorded for search and viewing by authorized staff and employers. Paperless case management and source document management and data validation modules position department and contractor staff for further deployment of business efficiencies through managed upgrades and modifications to the system.

VOS is a robust web-based computing system with strengths in ease of use and in its partnerships with internal units such as Unemployment Insurance, Adult Education, and potentially scalable interfaces and partnerships with other agencies in state government.

The Tennessee Department of Human Services (TDHS) – Vocational Rehabilitation (VR) is in the process of implementing a new case management system called Aware. The system is scheduled to go-live in June 2021. The new system will simplify data collection and report generation for staff, allowing for greater transparency and access to program-related data. The system was chosen in part because it is scalable and agile enough to implement changes to data collection and reporting in a timely manner and is designed to identify and easily collect all data field required by the VR Service Programs federal partners, the Rehabilitation Services Administration (RSA). The system also permits budgeting, facilitates fiscal transactions through external systems, and provides statistical and management report generation in accordance with the applicable state and federal regulations, particularly WIOA. It also has the capability of accepting and storing program documentation and generation of all federal reports, as well as division-specific reports, allowing the VR Program the opportunity to collect and accurately report on crucial program data.

## 2. The State policies that will support the implementation of the State’s strategies (e.g., co-enrollment policies and universal intake processes where appropriate). In addition, provide the State’s guidelines for State-administered one-stop partner programs’ contributions to a one-stop delivery system

The Tennessee Department of Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program considers an individual to have applied for VR services when the individual or, as appropriate, the individual’s representative has completed and signed a common intake form at an American Job Center and has been referred to a VR Counselor.

The Tennessee Department of Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program refers individuals who are not eligible for VR services or are not seeking employment or whose case is closed unsuccessful to a local American Job Center to address their employment needs.

*The State Workforce Development Board (SWDB) has three policies regarding the provision and oversight of services and partners within the American Job Center (AJC). The first policy is labeled WFS Policy- Local Governance. This policy lays out the requirements and duties of the Local Workforce Development Board (LWDB) to include the responsibility of setting policy, providing direction and monitoring those activities. The second policy is labeled WFS Policy- One Stop System Design. This policy lays out the specifics on the roles of all partners within the AJC system, the coordination amongst partners, the One-Stop Operator’s responsibility to manage staff and promote coordination, and the development of functional teams. The third policy is labeled WFS Policy- Co-*

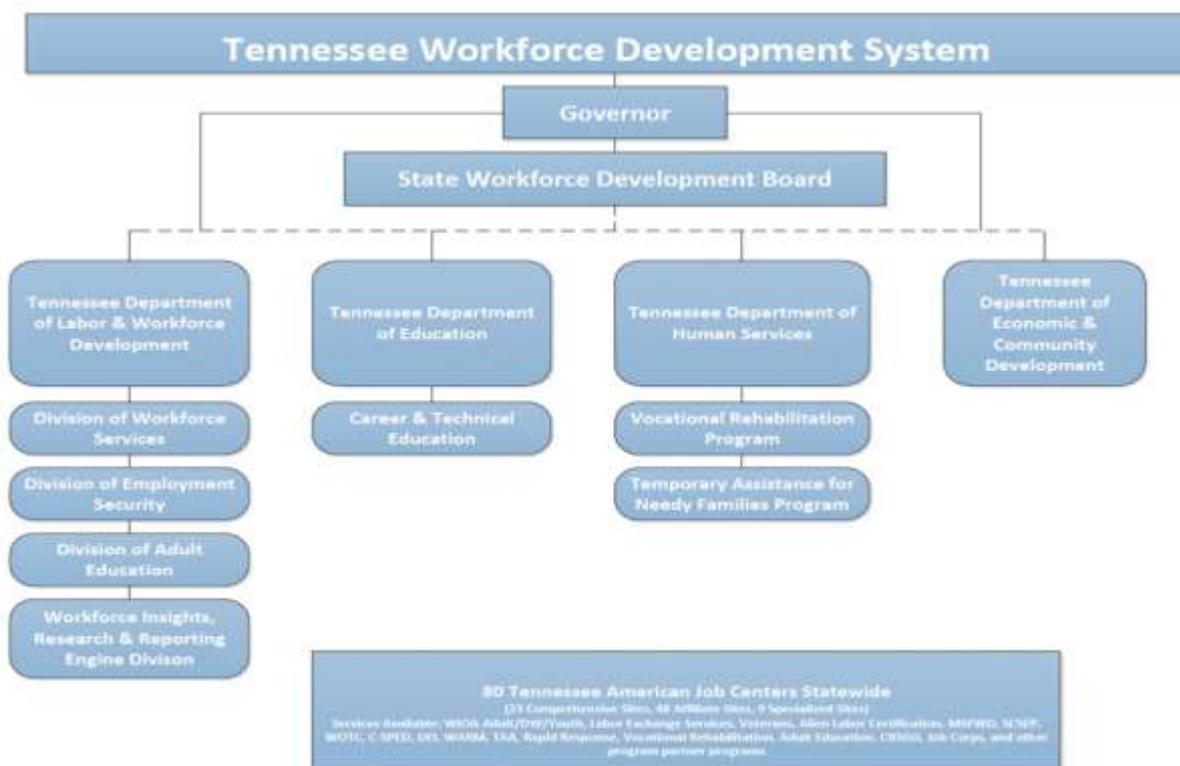
enrollment and this policy lays out the process for enrolling participants into multiple programs. These policies, along with the development of a Memorandum of Understanding (MOU) and Infrastructure Funding Agreement (IFA) at the LWDB level amongst partners, ensures the coordination between core, required and community partners to provide the needed services in each Local Workforce Development Area (LWDA). The WFS policies can be located at <https://www.tn.gov/workforce/general-resources/program-management/program-management-redirect/workforce-services-redirect/wioa-technical-assistance.html>.

To address the handling of One-Stop partners' contributions the state has a policy labeled One-Stop Infrastructure Governor's Guidance and guidance developed on the creation of local IFAs and MOUs labeled MOU/One Stop Service Delivery and Infrastructure Funding Agreement. These policies can be located at <https://www.tn.gov/workforce/general-resources/program-management/program-management-redirect/workforce-services-redirect/wioa-technical-assistance.html>.

### 3. State Program and State Board Overview

#### A. State Agency Organization

Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

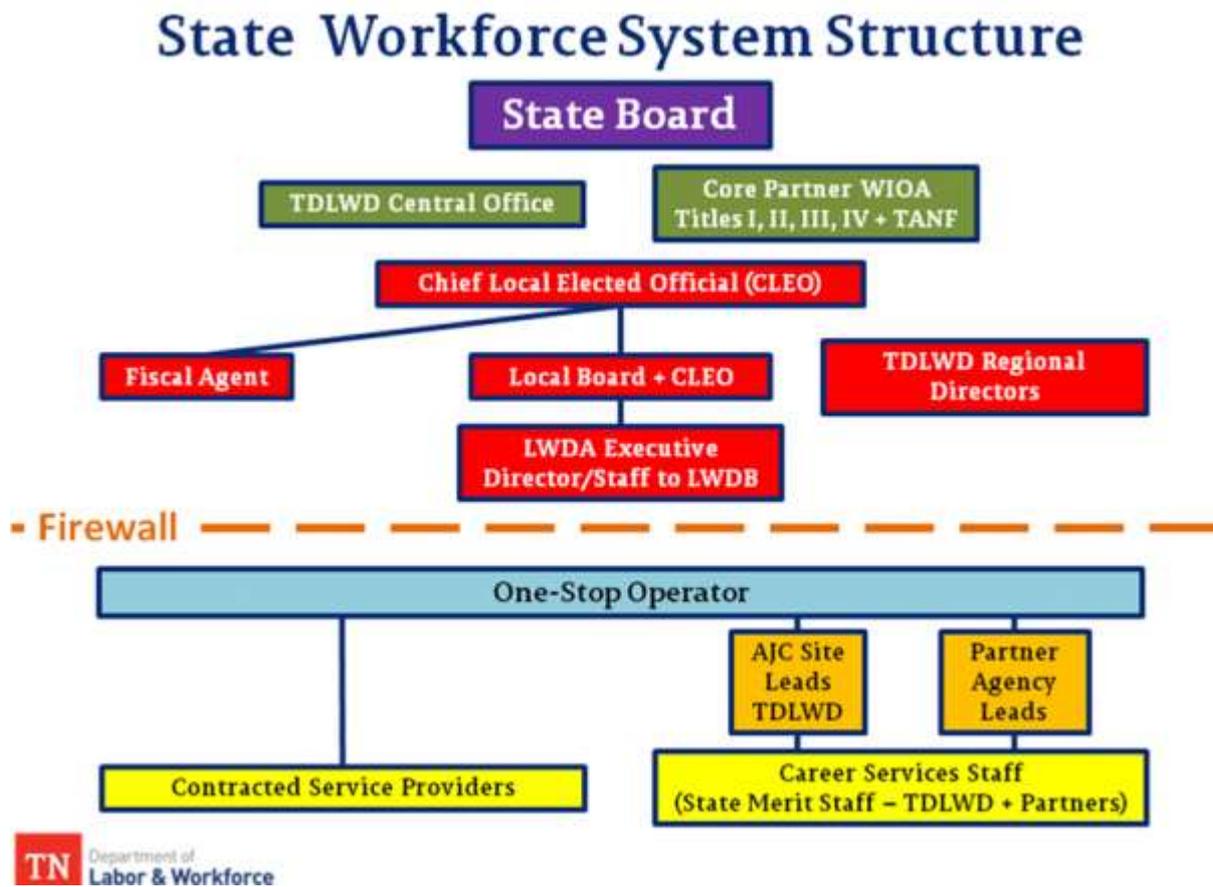


**Figure 4 - Tennessee State Agency Organization**

*Division of Workforce Insights, Research and Reporting Engine (WIRED)* – provides the labor market information statistics and data to help all the above divisions to make data driven decisions. The data includes the Workforce Information database (WID), State and Local industry and employment projections, Annual State Economic Analysis, Presentations, etc.

Under the oversight and direction of Governor Bill Lee, the Tennessee State Workforce Development Board is comprised of 24 members who carry out the state’s workforce functions and activities in

accordance with section 101 of WIOA. The activities within the Tennessee Workforce System cannot be carried out without the collaboration of multiple departments of the State of Tennessee including the Local Workforce Development areas.



**Figure 5 - TN State Workforce Development System Structure**

The Tennessee Department of Labor and Workforce Development (TDLWD) is authorized as the signatory entity designated to receive funds under WIOA. Within the context of WIOA, TDLWD administers services through the following:

- Division of Workforce Services - manages Title I and III funds as well as ensure workforce, job-training, and employment-related activities are provided in accordance to WIOA.
  - The Division of Workforce Services also provides oversight of programs and activities within the American Job Centers (AJC) which provides training and educational services as well as workforce development to Tennesseans across Tennessee. The AJCs have been positioned within their area to allow for physical and programmatic access to services and resources. In essence, the AJC is the face of the Tennessee Workforce System.
- Division of Employment Security - administers Tennessee’s Unemployment Insurance program and collects, analyzes, and disseminates Tennessee’s Labor Market Information.
- Division of Adult Education - manages the Title II, Adult Education, and Family Literacy Act program which delivers educational services to adults.

The Local Workforce System under the guidance of the State Workforce Board has formed its own structure which includes a Chief Elected Official, a Local Board, a fiscal agent, and TDLWD Regional

Directors. One of the responsibilities of the State Workforce Board is guiding the local workforce board through policy directives and overseeing the activities and services statewide. The role of the TDLWD central office (Workforce Service) staff along with the core partners is to assist the State Workforce Board. Staff support includes the development of policies, planning, evaluating program outcomes, monitoring the delivery system, allocating funds to the local areas, and the overall management of the workforce system.

**The Chief Local Elected Official (CLEO)** serves a crucial role on behalf of each unit of government in the workforce system because the CLEO is responsible for: selecting the local board; ensuring the local board is representative of the local area; being liable for the funding and the distribution of funds to the local area; designating the fiscal agent; and approving the budgets the area will use to operate the workforce system. Additionally, CLEO responsibilities include the developing the Memorandum of Understanding, overseeing the AJCs, and requesting the designation and certification of the Local Boards.

**The Local Board** is made up of selected individuals in the local area based on the criteria established in WIOA Section (107(c) (1). The Local Board along with the Chief Elected Official is responsible for the following activities: planning; procuring OSOs; selecting eligible service providers for training services; overseeing activities of the AJCs; developing local board policies; negotiating the local performance measures; and procuring youth service providers. If the Local Board is selected by the CLEO as the fiscal agent, the responsibility will extend to

**The Fiscal Agent** is an entity designated by the Chief Local Elected official (CLEO) and is responsible for the receipt, disbursement, accounting, auditing, monitoring, and reporting of all WIOA funds given by the TDLWD. The CLEO responsibility is to ensure that this agent has a clearly defined role and responsibility which are limited to accounting and funds management. The CLEO also has an understanding that the designation of a Fiscal Agent does not relieve the CLEO or Governor of liability for the misuse of grant funds.

**TDLWD Regional Directors** represent the TDLWD as a part of the board as required in (20 CFR 652.201). By representing the State on Local Boards, Regional Directors are responsible for regional level monitoring of activities with a strong emphasis on local public relations with the TDLWD. The Regional Directors must work in conjunction with LWDA/Local Board Executive Staff and also provide supervision of the AJC Site Leads.

## B. State Board

Provide a description of the State Board, including—

Under the oversight and direction of Governor Bill Lee, the Tennessee State Workforce Development Board is comprised of 24 members who carry out the state’s workforce functions and activities in accordance with section 101 of WIOA. The activities within the Tennessee Workforce System cannot be carried out without the collaboration of multiple departments of the State of Tennessee including the Local Workforce Development areas.

### i. Membership Roster

Provide a membership roster for the State Board, including members’ organizational affiliations.

Board Member Name	Employer or Organization	Member Affiliation

	<b>Board Member Name</b>	<b>Employer or Organization</b>	<b>Member Affiliation</b>
1.	Bill Lee	Tennessee State Government	Governor
2.	Clark Boyd	Tennessee State Government	Legislature- House
3.	Paul Bailey	Tennessee State Government	Legislature- Senate
4.	Jeff McCord	TN Department of Labor & Workforce Development	Commissioner -DLWD
5.	Danielle Barnes	TN Department of Human Services	Commissioner -DHS
6.	Penny Schwinn	TN Department of Education	Commissioner -DOE
7.	Bob Rolfe	TN Department of Economic & Community Development	Commissioner -ECD
8.	Kevin Brooks	City of Cleveland, TN	Government
9.	E.L. Morton	Campbell County	Government
10.	Kevin Vaughn	FirePro LLC	Apprenticeship
11.	Tim Berry	The Dollywood Company	Business and Industry
12.	Martha Axford	ABC Design, LLC	Business and Industry
13.	Ben Ferguson	Personnel Placements Holdings, Inc.	Business and Industry
14.	Bill Godwin	BACAR Constructors, Inc.	Business and Industry
15.	Marshall Graves	Stone Door Group	Business and Industry
16.	Ann Hatcher	HCA	Business and Industry
17.	Greg Persinger	Yates Services, LLC	Business and Industry
18.	Stuart Price	Lee Company	Business and Industry
19.	Jason Bates	Toyota Bodine Aluminum, Inc.	Business Representative
20.	Michelle Falcon	Aegis Sciences Corporation	Business Representative
21.	Warren Logan Jr.	Urban League of Greater Chattanooga	Community Based Org
22.	Christine Hopkins	Middle Tennessee Rural Reentry	General Public
23.	Rhonnie Brewer	Socially Twisted	Organized Labor
24.	Vonda McDaniel	AFL-CIO	Organized Labor

**Table 22: Current Tennessee State Workforce Development Board Membership Roster**

The current State Workforce Development Board composition for Tennessee was proposed and approved after the initial implementation of the Workforce Innovation and Opportunity Act. The State requested a waiver to reconstitute the board and was granted approval prior to the submission of our first WIOA Combined State Plan. Subsequent to that we understand that the current composition does not reflect the requirements under WIOA. Therefore, we have proposed a new board restructuring model to become effective July 1<sup>st</sup>. **Please note:** Due to the ongoing public health emergency in our State, the Governor may need additional time to finalize the necessary board appointments. We will update all federal partners on the status of the final board reconstitution. A copy of the proposed board structure is outlined below:

Board Member Name	Employer or Organization of Board Member	Special Requirement	Total Percentage of Board	Board Numbers
	<b>Representatives of Business</b>	<b>(WIOA Section 101(b)(1)(C)(i))</b>		
Martha Axford	ABC Design, LLC	<b>Business</b>		<b>1</b>
Tim Berry	Dollywood	<b>Business</b>		<b>1</b>
Michelle Falcon	Aegis Sciences Corporation	<b>Business</b>		<b>1</b>
Ann Hatcher	HCA	<b>Business</b>		<b>1</b>
Christine Hopkins	Middle TN Rural Reentry	<b>Business</b>		<b>1</b>
Greg Persinger	Yates Services, LLC	<b>Business</b>		<b>1</b>
Stuart Price	Lee Company	<b>Business</b>		<b>1</b>
Marshall Graves	Stone Door Group	<b>Business</b>		<b>1</b>
Ben Ferguson	Personnel Placements Holdings, Inc.	<b>Business</b>		<b>1</b>
Bill Godwin	BACAR Constructors, Inc.	<b>Business</b>		<b>1</b>
New Appointee		<b>Business</b>		<b>1</b>
New Appointee		<b>Business</b>		<b>1</b>
New Appointee		<b>Business</b>		<b>1</b>
New Appointee		<b>Business</b>		<b>1</b>
New Appointee		<b>Business</b>		<b>1</b>
New Appointee		<b>Business</b>		<b>1</b>
New Appointee		<b>Business</b>		<b>1</b>
		<b>Business Total</b>	<b>52%</b>	<b>17</b>

Board Member Name	Employer or Organization of Board Member	Special Requirement	Total Percentage of Board	Board Numbers
		This must be a majority		
	<b>Representatives of Workforce</b>	<b>(WIOA Section 101(b)(1)(C)(ii))</b>		
Warren Logan	Urban League of Chattanooga	<b>Community Based Organization</b>		<b>1</b>
Vonda McDaniel	TN AFL-CIO/AFL-CIO	<b>Organized Labor</b>		<b>1</b>
Rhonnie Brewer	Socially Twisted	<b>Organized Labor</b>		<b>1</b>
	PROGENY PLACE			
Kevin Vaughn	FirePro LLC	<b>Apprenticeship/Training</b>		<b>1</b>
Jason Bates	Toyota Bodine Aluminum, Inc.	<b>Apprenticeship/Training</b>		<b>1</b>
New Appointee				<b>1</b>
New Appointee				<b>1</b>
		<b>Workforce Total</b>	<b>21%</b>	<b>7</b>
		This must be at least 20%		
	<b>Representatives of State Legislature</b>	<b>(WIOA Section 101(b)(1)(B))</b>		
Representative Clark Boyd	Tennessee State Government	<b>State Representative</b>		<b>1</b>
Senator Paul Bailey	Tennessee State Government	<b>State Representative</b>		<b>1</b>
		<b>State Legislature Total</b>	<b>6%</b>	<b>2</b>
	<b>Representatives of Government</b>	<b>(WIOA Section 101(b)(1)(C)(iii))</b>		
Penny Schwinn	Tennessee Department of Education	<b>Education (Perkins)</b>	<i>State Agency Official/Partner</i>	<b>1</b>
Bob Rolfe	Tennessee Department of Economic and Community Development	<b>Economic &amp; Community Development</b>	<i>State Agency Official/Partner</i>	<b>1</b>
Jeff McCord	Tennessee Department of	<b>Labor &amp; Workforce</b>	<i>State Agency</i>	<b>1</b>

Board Member Name	Employer or Organization of Board Member	Special Requirement	Total Percentage of Board	Board Numbers
	Labor and Workforce Development	Development	Official/Partner	
Danielle W Barnes	Tennessee Department of Human Services	Human Services (VR & TANF)	State Agency Official/Partner	1
Mayor E.L. Morton	Campbell County Government	Chief Elected Official - County		1
Mayor Kevin Brooks	City of Cleveland	Chief Elected Official - City		1
		<b>Government Total</b>	<b>18%</b>	<b>6</b>
	<b>Governor</b>	<b>WIOA Sec. 101(b)(1)(A)</b>		
Tony Niknejad	Tennessee State Government	Governor's Designee	3%	1
		<b>GRAND TOTAL:</b>		<b>33</b>

Table 22a: Proposed Tennessee State Workforce Development Board Restructuring Model

The Commissioner of the Department of Labor and Workforce Development will continue to represent Title I, Title III and Adult Education. Guidance shared in TEGL 27-14 does not prohibit a head of a State Agency from representing multiple programs although it may not be advisable under certain conditions. However, it has been determined by our Governor that in this instance the Commissioner's representation of these programs has continued to promote and ensure deeper integration, alignment and program efficiency.

The Commissioner of the Department of Human Services will continue to represent Vocational Rehabilitation as this program remains under the oversight of this agency.

## ii. Board Activities

Provide a description of the activities that will assist State Board members and staff in carrying out State Board functions effectively.

As stated in (b) (3) (A), one of the responsibilities of the State Workforce Board is guiding the local workforce board through policy directives and overseeing statewide activities and services. The role of the TDLWD central office (Workforce Service) staff along with the core partners is to assist the State Workforce Board staff. Staff support includes the development of policies, planning, evaluating program outcomes, monitoring the delivery system, allocating funds to the local areas and the overall management of the workforce system.

As identified in Tennessee's bylaws the Board function is to:

- Identify the workforce development needs of the State, analyze and assess new federal policy and program initiatives, and make recommendations toward improving statewide

policies, goals, and guidelines for the coordination of all workforce education, employment, and training programs;

- Review the provision of services and the use of funds and resources under applicable Federal workforce development programs and advise the Governor on methods of improving and coordinating the use of such funds and resources. Where necessary, the Board shall develop and implement appropriate State and local performance measures to ensure that such resources and funds are being used effectively;
- Make an annual report to the Governor which shall be a public document. It shall issue such other studies, reports, or documents as it deems advisable to assist in improving the delivery of workforce development services and in carrying out the purposes of the State Workforce Development System;
- Identify the employment and training and vocational education needs throughout the state; assess the extent to which employment and training, vocational education, rehabilitation services, economic development, temporary assistance for needy families, and other federal, state, and local programs and services represent a consistent, integrated, and coordinated approach to meeting such needs; and
- Review plans of all state agencies providing employment, training, and related services, and provide comments and recommendations to the Governor, the state legislature, the state agencies, and the appropriate federal agencies on the relevancy and effectiveness of employment and training, and related service delivery systems in the state.

## 4. Assessment and Evaluation of Programs and One-Stop Program Partners

### A. Assessment of Core Programs

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

Performance reporting is led by the Tennessee Department of Labor and Workforce Development, Workforce Services Division and partner agencies regularly report progress on the core performance indicators identified in section 116(b) of WIOA. The quality and effectiveness of state partner programs are measured by their ability to meet or exceed their agency's target.

*The Workforce Services Division and Workforce Insights Research and Reporting Engine (WIR<sup>2</sup>ED) divisions provide reports in Jobs4tn (integrated case management system) that enables co-enrollment across programs to the LWDA's that can be run prior to each quarterly PIRL submission. These reports include Title 1- Adult, Dislocated Worker, Youth, National Dislocated Worker Grant, Title 3- Wagner Peyser, JVSG, and TAA. Each local area reviews and monitors each of their area's performance outcomes. The divisions also track on spreadsheets the percent of target for each of the LWDA. These reports are to track whether the respective LWDA is meeting the 90% threshold. If an area is falling below a 90% of their respective negotiated target, this is coded yellow or red and the information is shared with Workforce Services' management. Technical assistance is then provided from the respective program subject matter expert to the respective LWDA(s) in order to improve that specific outcome for the next quarter. In addition, each LWDA area provides monitoring throughout the year on active and exited cases. This allows the areas to find issues and make corrections to the*

*data ensuring that we have quality data in our system. The department also continues to conduct our annual data validation process after the end of each program year as required in TEGL 7-18. Key performance indicators have been set for all partners so that we ensure we are serving participants from each barrier categories. We have hired an independent firm to conduct a process improvement analysis in order to improve the customer experience.*

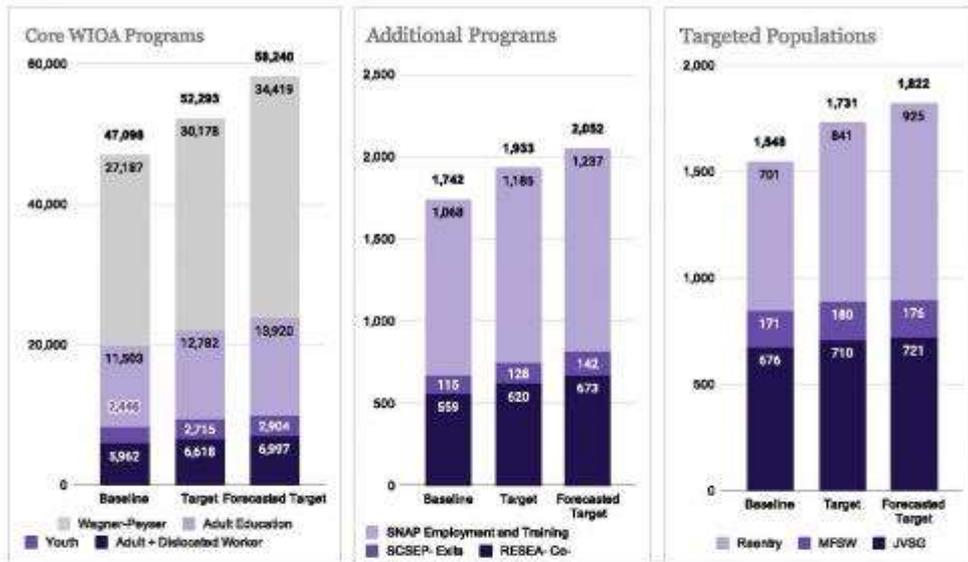
Additionally, each state VR agency is required to perform a comprehensive statewide needs assessment (CSNA) every three years. The CSNA is required as part of the Rehabilitation Act of 1973 as amended by the Workforce Innovation and Opportunities Act (WIOA). The CSNA serves as the basis for state plan goals, objectives, and strategies and is used as a tool for informing the public and enhancing community awareness about the VR program.

## **B. Assessment of One-Stop Partner Programs**

Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. Such state assessments should take into account local and regional planning goals.

Performance reporting is led by the Tennessee Department of Labor and Workforce Development, Workforce Services Division and partner agencies regularly report progress on the core performance indicators identified in section 116(b) of WIOA. The quality and effectiveness of state partner programs are measured by their ability to meet or exceed their agency's target.

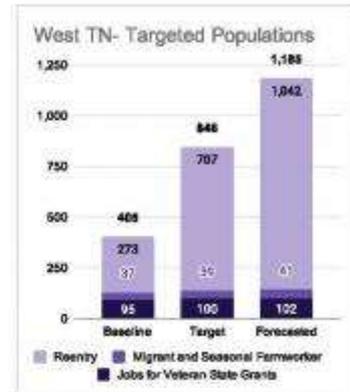
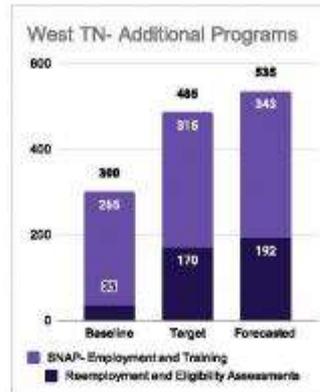
*In addition to the programs that are assessed for quality, effectiveness, and need for improvement, the Workforce Services Division is continuing the process of developing State, regional and local performance measures (locally and regionally referred to as Key Performance Indicators or KPIs). These KPIs consist of measures including but not limited to new enrollments, co-enrollments, exits, as well as new classifications and span across the Governor's priorities in addition to the core and required partners under WIOA (Title I Adult, Dislocated Worker, and Youth; Adult Education, Wagner-Peyser, Vocational Rehabilitation, Senior Community Service Employment Program, Reemployment and Eligibility Assessments, Trade Adjustment Assistance, Temporary Assistance for Needy Families, Youthbuild, Supplemental Nutrition Assistance Program Employment and Training, Jobs for Veterans State Grants, Migrant and Seasonal Farm Workers, Reentry, and Distressed Counties). Progress towards achieving these negotiated targets, now in its pilot year, is reported to our State Workforce Development Board on a quarterly basis. These KPIs are analyzed for best practices and areas for improvement with the goal of increasing the impact of Tennessee's public workforce system in order to make Tennessee "the best public workforce system in the nation." Areas of needed improvement are addressed by respective subject matter experts through review of these KPIs by program, then technical assistance is provided with all partners involved with the respective KPIs. (Please refer to the following KPI Enrollments November 2019 for example.)*



Core Programs	Target	Baseline	Forecasted Target	Measure	Geography	Historical Trend
WIOA Title I- Adult and Dislocated Worker	6,618	5,962	6,997	New Enrollment	Region	↓
Youth	2,715	2,446	2,904	New Enrollment	Region	—
WIOA Title II- Adult Education	12,782	11,503	13,920	New Enrollment	Provider	↓
WIOA Title III- Wagner-Peyser	30,178	27,187	34,419	New Enrollment	Region	↓
WIOA Title IV- Vocational Rehabilitation	X	5,298	X	X	X	↓

Additional Programs	Target	Baseline	Forecasted Target	Measure	Geography	Historical Trend
Reemployment and Eligibility Assessments	738	559	819	Co-Enrollment	Region	↓
Senior Community Service Employment Program	128	116	142	Exts	Provider	↓
SNAP- Employment and Training	1,499	1,350	1,581	New Enrollment	Region	↑
Trade Adjustment Assistance	84.8%	19.6%	30.0%	Co-Enrollment w/ Title I	LWDA	—
Temporary Assistance for Needy Families- Families First	X	X	X	X	X	X
Youthbuild	X	X	X	X	X	X

Targeted Populations	Target	Baseline	Forecasted Target	Measure	Geography	Historical Trend
Distressed Counties	X	X	X	X	X	X
Jobs for Veteran State Grants	710	676	721	New Enrollment	Region	↑
Migrant and Seasonal Farmworker	180	171	176	New Enrollment	Region	↓
Reentry	9,000	701	3,000	New Enrollment	Region	↑



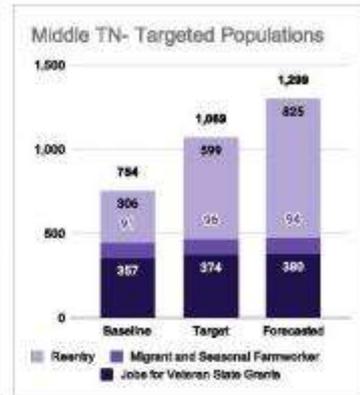
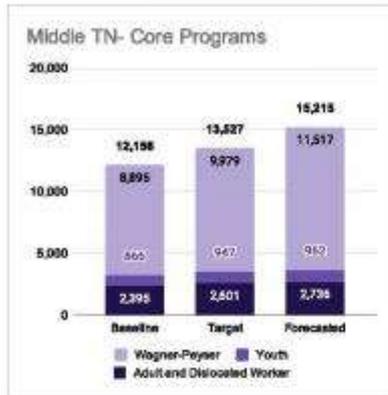
Core Programs	Baseline	Target	Forecasted Target	Measure	Methodology	Historical Trend
Adult and Dislocated Worker	1,667	1,881	1,952	New Enrollment	Regional Baseline + (State Increase x proportion of allocation)	—
Youth	768	827	987	New Enrollment	Regional Baseline + (State Increase x proportion of allocation)	↓
Adult Education	NA	NA	NA	NA	Provider Specific	↓
Wagner-Peyser	8,627	9,410	10,521	New Enrollment	Regional Baseline + (State Increase x proportion of working poor)	↓
Vocational Rehabilitation	1,416	X	X	X	X	↑

Additional Programs	Baseline	Target	Forecasted Target	Measure	Methodology	Historical Trend
Reemployment and Eligibility Assessments	35	170	192	Co-Enrollment	State Target x Proportion of LI Claimants Selected	↓
Senior Community Service Employment Program	NA	NA	NA	NA	Provider Specific	NA
SNAP- Employment and Training	295	315	343	New Enrollment	Relative SNAP Participants	↑
Trade Adjustment Assistance	X	35.0%	50.0%	Co-Enrollment w/ Title I	Federal Mandate	—
Temporary Assistance for Needy Families- Families First	X	X	X	X	X	X
Youthbuild	X	X	X	X	X	X

Targeted Populations	Baseline	Target	Forecasted Target	Measure	Methodology	Historical Trend
Distressed Counties	X	X	X	X	X	X
Jobs for Veteran State Grants	95	100	102	New Enrollment	Regional Baseline + (State increase x proportion of staff)	↑
Migrant and Seasonal Farmworker	37	39	41	New Enrollment	Regional Baseline + (Regional Baseline x State targeted growth rate)	↑
Reentry	273	707	1,042	New Enrollment	Regional Baseline + (State Increase x Relative Potential to Serve)	↑



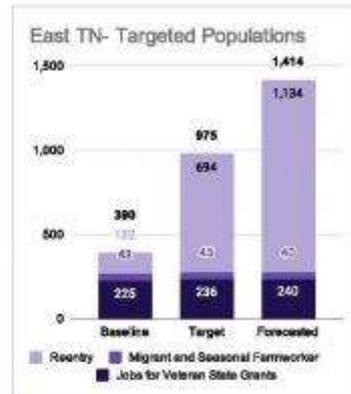
Core Programs	Baseline	Target	Forecasted Target	Measure	Methodology	Historical Trend
Adult and Dislocated Worker	2,395	2,601	2,736	New Enrollment	Regional Baseline + (State Increase x proportion of allocation)	↓
Youth	566	947	952	New Enrollment	Regional Baseline + (State Increase x proportion of allocation)	↑
Adult Education	NA	NA	NA	NA	Provider Specific	↓
Wagner-Peyser	8,895	9,979	11,517	New Enrollment	Regional Baseline + (State Increase x proportion of working poor)	↓
Vocational Rehabilitation	2,124	X	X	X	X	↑

Additional Programs	Baseline	Target	Forecasted Target	Measure	Methodology	Historical Trend
Reemployment and Eligibility Assessments	299	325	332	Co-Enrollment	Regional Baseline + (11% increase x Proportion of LA Claimants Selected)	↓
Senior Community Service Employment Program	NA	NA	NA	NA	Provider Specific	NA
SNAP- Employment and Training	407	482	478	New Enrollment	Relative SNAP Participants	↑
Trade Adjustment Assistance	X	35.0%	30.0%	Co-Enrollment w/ Title I	Federal Mandate	—
Temporary Assistance for Needy Families-Families First	X	X	X	X	X	X
Youthbuild	X	X	X	X	X	X

Targeted Populations	Baseline	Target	Forecasted Target	Measure	Methodology	Historical Trend
Distressed Counties	X	X	X	X	X	X
Jobs for Veteran State Grants	357	374	380	New Enrollment	Regional Baseline + (State Increase x proportion of staff)	↑
Migrant and Seasonal Farmworker	91	96	94	New Enrollment	Regional Baseline + (Regional Baseline x State targeted growth rate)	↓
Reentry	306	599	825	New Enrollment	Regional Baseline + (State Increase x Relative Potential to Serve)	↑



Core Programs	Baseline	Target	Forecasted Target	Measure	Methodology	Historical Trend
Adult and Dislocated Worker	1,901	2,141	2,300	New Enrollment	Regional Baseline + (State Increase x proportion of allocation)	—
Youth	812	911	954	New Enrollment	Regional Baseline + (State Increase x proportion of allocation)	↑
Adult Education	NA	NA	NA	NA	Provider Specific	↓
Wagner-Peyser	9,655	10,788	12,381	New Enrollment	Regional Baseline + (State Increase x proportion of working poor)	↓
Vocational Rehabilitation	2,000	X	X	X	X	—

Additional Programs	Baseline	Target	Forecasted Target	Measure	Methodology	Historical Trend
Reemployment and Eligibility Assessments	225	244	281	Co-Enrollment	Regional Baseline + (11% Increase x Proportion of UI Claimants Selected)	↓
Senior Community Service Employment Program	NA	NA	NA	NA	Provider Specific	NA
SNAP- Employment and Training	678	731	761	New Enrollment	Relative SNAP Participants	↑
Trade Adjustment Assistance	X	35.0%	30.0%	Co-Enrollment w/ Title I	Federal Mandate	—
Temporary Assistance for Needy Families-Families First	X	X	X	X	X	X
Youthbuild	X	X	X	X	X	X

Targeted Populations	Baseline	Target	Forecasted Target	Measure	Methodology	Historical Trend
Distressed Counties	X	X	X	X	X	X
Jobs for Veteran State Grants	225	236	240	New Enrollment	Regional Baseline + (State Increase x proportion of staff)	↑
Migrant and Seasonal Farmworker	43	45	40	New Enrollment	Regional Baseline + (Regional Baseline x State targeted growth rate)	↓
Reentry	122	694	1,124	New Enrollment	Regional Baseline + (State Increase x Relative Potential to Serve)	↑

Our State Workforce Development Board's (SWDB) Certification Standards established and communicated clear expectations and minimum requirements for American Job Centers (AJC). They measure the effectiveness of system management and services to job seekers and employers and is one of the ways that core, mandatory and non-traditional partner programs are assessed each year. As required by WIOA, the State initiated the evaluation process in 2017 and the Local Workforce Development Boards (LWDB) will re-evaluate every three years thereafter.

Additionally, each state VR agency is required to perform a comprehensive statewide needs assessment (CSNA) every three years. The CSNA is required as part of the Rehabilitation Act of 1973 as amended by the Workforce Innovation and Opportunities Act (WIOA). The CSNA serves as the basis for state plan goals, objectives, and strategies and is used as a tool for informing the public and enhancing community awareness about the VR program.

## C. Previous Assessment Results

Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle). Describe how the State is adapting its strategies based on these assessments.

*The realignment of the LWDA's in 2018 strengthened the workforce system to further align the education, workforce, and economic development sectors. Since the realignment in 2018, additional statewide agencies have aligned to the economic job base camps, established under our previous Governor, which provides more opportunity to regionalize economic and workforce development activities and optimize opportunities for sharing and leveraging resources in the areas of education and workforce development partnerships. This realignment was a pivotal strategy for implementing sector partnerships and building a foundation for strengthening the workforce system to engage partners.*

*The State Workforce Development Board conducted an assessment through the assistance of a third party to determine the effectiveness of overall programs in the One-Stop centers. This assessment focused on several areas of leading practices in the state that focused on alignment, administration, contract management and strong policy adherence, to include One-Stop Operator and Career Service Provider procurement. In addition, the assessment addressed overall strategy, roles and responsibilities, organizational structures, LWDB performance, etc., to include the need for improvements to the workforce system. Copies of these assessment reports are available at the following website: <https://www.tn.gov/workforce/lwda-assessment>*

*In order to assist in the development of new strategies to support system effectiveness, the SWDB is supporting a second phase of system transformation which began early in 2020 and will conclude the first part of 2021. This assessment is focused on strengthening organizational structures, improved strategic planning, local board development, process design and deployment, and additional technology improvements. To support the transformation journey ahead, a Transformation Management Office has been established to 1) better understand needs and challenges across the state; 2) develop a plan to address those issues through key initiatives and programs; 3) oversee execution activities and ensure that intended outcomes are achieved; 4) ensure we work together as a system to deliver the best value to our customers; and 5) drive continuous evolution and optimization. The Transformation Management Office which includes leaders across the state (SWDB members, LWDB chairs and executive directors, state workforce development staff, program subject matter experts) primary initiatives include improved customer experience, leadership/board development, strategic plan reviews, process review and redesign, and technology improvements. This TMO will be a long term initiative to support the aforementioned goals and objectives to support system effectiveness.*

The Tennessee Department of Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program conducts ongoing review and analysis of the quarterly performance data submitted for the Tennessee Workforce Dashboard. The VR Services Program can identify trends and compare with partner agencies on specific core performance measures. Through the review of this data, VR identifies opportunities for improvement and works to implement program and policy changes.

## D. Evaluation

Describe how the State will conduct evaluations and research projects on activities under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA.

Since 2018 State Plan Modifications, the State conducted an assessment in 2019 on the overall effectiveness of the workforce development system by utilizing a third-party contractor. This entity completed the statewide evaluation of the workforce system organizational structure, and also the operating model's ability to support efficient processes and internal controls. The assessment encompassed 1) highlighted strengths and weaknesses of the current organization structure; 2) review of roles and responsibilities for proper role alignment; 3) provided recommendations regarding operational policies and procedures; 4) assessment of current risk/control/performance monitoring capabilities with areas of improvement identified; 5) review of internal control design and assessment of operating effectiveness of key controls; and 6) review of current data entry and reporting process to identify opportunities to implement automation. Observations and recommendations were made regarding the above referenced processes and internal controls for all nine Local Workforce Development Areas (LWDAs), as well for the state. As a result of this evaluation, follow up discussions have identified crucial improvements and strategies needed in the existing workforce structure to effectively and efficiently support the Governor's workforce initiatives for Tennessee.

To further evaluate and improve the system; the State will be utilizing the same third-party contractor to follow-up on the previous assessment and focus on the following key six areas.

- 1) Organizational structure analysis - Contractor will assist State in implementing recommendations related to governance and process, including (a) performing a detailed quantitative analysis of the various Local Workforce Development Area (LWDA) organizational structures, which also includes analyzing the benefits and drawbacks associated with each structure, (b) developing key metrics to analyze administrative and provider costs, and (c) reviewing board staff makeup and provider costs; Contractor will analyze the benefits of structuring all LWDAs in the same manner;
- 2) Strategic plan process review - Contractor will work with one LWDA (as chosen by the State) to assist the local area with implementing recommendations related to the area's strategic plan; Contractor will assist the LWDAs in documenting their processes, including stakeholder involvement and ongoing monitoring, and the development of key metrics to measure outcomes; Contractor will work with the LWDA to create a roadmap to achieve desired strategic outcomes;
- 3) Board development - Contractor will design a leadership development program to offer to Local Workforce Development Boards; Contractor will conduct two learning sessions;
- 4) Process design and deployment - Contractor will document 4-6 future state processes; Deploy processes at 1-2 local areas;
- 5) Customer experience pilot - Contractor will work with all LWDAs to perform a customer experience journey map at local AJCs - Contractor will develop persona matrices for LWDAs; Contractor will work with State to develop Customer Journey Rollout plan;
- 6) Technology improvements - Contractor will work with State to identify and document leading practices for the VOS system; Contractor will review use of Grants4TN and develop design requirements for replacement system.

Additional assessment of the workforce system will continue to take place through Quarterly and Annual monitoring of the LWDAs to include feedback from leadership from each of the 9 LWDAs. Those monitoring reviews will allow the State to determine the capacity of each LWDA and provide opportunities to determine their current service level and areas that will need improvement. Evaluation of specific programs will also take place such as an official evaluation of the Re-Employment Services and Eligibility Assessment (RESEA) program per UIPL 07-19. The State will be utilizing a third-party contractor to evaluate the effectiveness of the RESEA program to include considering new ideas such as the utilization of self-scheduling, the mobile American Job Center (AJC), and video technology (i.e. Skype).

## 5. Distribution of Funds for Core Programs

Describe the methods and factors the State will use in distributing funds under the core programs in accordance with the provisions authorizing such distributions.

### A. For Title I Programs

Provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—

#### i. Youth Activities in Accordance with WIOA Section 128(b)(2) or (b)(3)

Allocation Factor	Weight Assigned in Formula	Data Source
<b>Unemployment in Areas of Substantial</b>	33 1/3%	Local Area Unemployment Statistics
<b>Unemployment (6.5%)</b>		(Annual Data)
<b>Excess Unemployed (4%)</b>	33 1/3%	Local Area Unemployment Statistics
<b>Economically Disadvantaged Adult/Youth</b>	33 1/3%	Census

**Table 23: TN Allocation Formula for WIOA Adult and Youth Programs**

1. State relative share of total unemployed in areas of substantial unemployment (ASU) (average 12 months ending 6/30)
2. State relative share of excess unemployed (average 12 months ending 6/30)
3. State relative share of disadvantaged adults. An adult aged 22-72 whose income, or whose family income was below the poverty level or below 70 percent of the poverty lower living standard.
4. State relative share of disadvantaged youth: A youth aged 16-21 whose income or whose family income was below the poverty level or below 70% the poverty lower living standard

For further details regarding the TDLWD's methods and factors used to distribute Title I funds to local areas, please refer to Workforce Services Policy - Title I Formula Allocation Methodology located on TDLWD technical assistance web page at [TN.gov/workforce\\_](http://TN.gov/workforce_)

LWDA	Youth	Adult	Dislocated Worker	TOTAL
NE	\$1,051,237.07	\$1,053,787.24	\$974,558.97	\$3,079,583.29
ET	\$2,148,048.93	\$2,103,069.12	\$2,270,868.41	\$6,521,986.45
SE	\$1,474,350.03	\$1,413,741.20	\$1,344,300.36	\$4,232,391.58
SM	\$696,839.35	\$696,406.10	\$858,271.34	\$2,810,978.84
UC	\$673,689.63	\$690,668.57	\$642,797.32	\$2,007,155.52
NM	\$2,351,514.97	\$2,206,922.05	\$3,405,635.66	\$7,964,072.67
SW	\$768,183.92	\$772,838.77	\$594,163.26	\$2,135,185.96
NW	\$727,346.42	\$732,473.74	\$618,073.05	\$2,077,893.21
GM	\$3,557,052.67	\$3,397,107.22	\$2,921,088.64	\$9,875,248.52
<b>TOTAL</b>	<b>\$13,488,263</b>	<b>\$13,067,014</b>	<b>\$13,629,757</b>	<b>\$40,185,034</b>
<b>Regional PY 2019-2020 Allocations</b>				
<b>East</b>	\$4,673,636.03	\$4,570,597.56	\$4,589,727.73	\$13,833,961.32
<b>Middle</b>	\$3,722,043.95	\$3,593,996.71	\$5,466,166.35	\$12,782,207.01
<b>West</b>	\$5,052,583.01	\$4,902,419.72	\$4,133,324.95	\$14,088,327.68

Table 25: Program Year (PY) 2019 WIOA Title I Adult, Dislocated Worker and Youth Activities Program Allotments

ii. Adult and Training Activities in Accordance with WIOA Section 133(b)(2) or (b)(3)

Allocation Factor	Weight Assigned in Formula	Data Source
<b>Unemployment in Areas of Substantial</b>	33 1/3%	Local Area Unemployment Statistics
<b>Unemployment (6.5%)</b>		(Annual Data)
<b>Excess Unemployed (4%)</b>	33 1/3%	Local Area Unemployment Statistics
<b>Economically Disadvantaged Adult/Youth</b>	33 1/3%	Census

Table 23: TN Allocation Formula for WIOA Adult and Youth Programs

1. State relative share of total unemployed in areas of substantial unemployment (ASU) (average 12 months ending 6/30)
2. State relative share of excess unemployed (average 12 months ending 6/30)
3. State relative share of disadvantaged adults. An adult aged 22-72 whose income, or whose family income was below the poverty level or below 70 percent of the poverty lower living standard.
4. State relative share of disadvantaged youth: A youth aged 16-21 whose income or whose family income was below the poverty level or below 70% the poverty lower living standard

For further details regarding the TDLWD's methods and factors used to distribute Title I funds to local areas, please refer to Workforce Services Policy - Title I Formula Allocation Methodology located on TDLWD technical assistance web page at [TN.gov/workforce](http://TN.gov/workforce).

LWDA	Youth	Adult	Dislocated Worker	TOTAL
NE	\$1,051,237.07	\$1,053,787.24	\$974,558.97	\$3,079,583.29
ET	\$2,148,048.93	\$2,103,069.12	\$2,270,868.41	\$6,521,986.45
SE	\$1,474,350.03	\$1,413,741.20	\$1,344,300.36	\$4,232,391.58
SM	\$696,839.35	\$696,406.10	\$858,271.34	\$2,810,978.84
UC	\$673,689.63	\$690,668.57	\$642,797.32	\$2,007,155.52
NM	\$2,351,514.97	\$2,206,922.05	\$3,405,635.66	\$7,964,072.67
SW	\$768,183.92	\$772,838.77	\$594,163.26	\$2,135,185.96
NW	\$727,346.42	\$732,473.74	\$618,073.05	\$2,077,893.21
GM	\$3,557,052.67	\$3,397,107.22	\$2,921,088.64	\$9,875,248.52
<b>TOTAL</b>	<b>\$13,488,263</b>	<b>\$13,067,014</b>	<b>\$13,629,757</b>	<b>\$40,185,034</b>
<b>Regional PY 2019-2020 Allocations</b>				
<b>East</b>	\$4,673,636.03	\$4,570,597.56	\$4,589,727.73	\$13,833,961.32
<b>Middle</b>	\$3,722,043.95	\$3,593,996.71	\$5,466,166.35	\$12,782,207.01
<b>West</b>	\$5,052,583.01	\$4,902,419.72	\$4,133,324.95	\$14,088,327.68

**Table 25: Program Year (PY) 2019 WIOA Title I Adult, Dislocated Worker and Youth Activities Program Allotments**

iii. Dislocated Worker Employment and Training Activities in Accordance with WIOA Section 133(b)(2) and Based on Data and Weights Assigned

Allocation Factor	Weight Assigned in Formula	Data Source
<b>Unemployment Insurance Beneficiaries</b>	35%	Unemployment Insurance data (Most Recent Year)
<b>Unemployment in Areas of Substantial</b>	35%	U.S Dep. Of Labor, Bureau of Labor statistics and TDLWD WIRED TDLWD WIRED
<b>Unemployment (6.5%)</b>		TDLWD WIRED
<b>Plant closure and Mass Layoffs</b>	3%	Plant Closures and mass layoffs employers report to
		TDLWD according to WARN (Annual)
<b>Declining Industries</b>	7%	Declining Industries data TDLWD WIRED
		(Recent Data)
<b>Long Term Unemployment Insurance Beneficiaries</b>	20%	Unemployment Insurance data (most recent year; beneficiaries' 15 weeks or more)

**Table 24: TN Allocation Formula for WIOA Dislocated Worker Programs**

1. UI claimants drawing unemployment insurance within the benefit year
2. Number of unemployed persons in areas of unemployment rate of 6.5 percent and above
3. Plant closures employers reported to TDLWD in each LWDA.
4. Number of jobs lost as determined by employment reports of employers as filed with the TDLWD under the Unemployment Insurance program past five years.
5. UI beneficiaries' claimants 15 weeks or more by LWDA.

For further details regarding the TDLWD's methods and factors used to distribute Title I funds to local areas, please refer to Workforce Services Policy - Title I Formula Allocation Methodology located on TDLWD technical assistance web page at [TN.gov/workforce\\_](http://TN.gov/workforce_)

LWDA	Youth	Adult	Dislocated Worker	TOTAL
<b>NE</b>	\$1,051,237.07	\$1,053,787.24	\$974,558.97	\$3,079,583.29
<b>ET</b>	\$2,148,048.93	\$2,103,069.12	\$2,270,868.41	\$6,521,986.45
<b>SE</b>	\$1,474,350.03	\$1,413,741.20	\$1,344,300.36	\$4,232,391.58
<b>SM</b>	\$696,839.35	\$696,406.10	\$858,271.34	\$2,810,978.84
<b>UC</b>	\$673,689.63	\$690,668.57	\$642,797.32	\$2,007,155.52

LWDA	Youth	Adult	Dislocated Worker	TOTAL
<b>NM</b>	\$2,351,514.97	\$2,206,922.05	\$3,405,635.66	\$7,964,072.67
<b>SW</b>	\$768,183.92	\$772,838.77	\$594,163.26	\$2,135,185.96
<b>NW</b>	\$727,346.42	\$732,473.74	\$618,073.05	\$2,077,893.21
<b>GM</b>	\$3,557,052.67	\$3,397,107.22	\$2,921,088.64	\$9,875,248.52
<b>TOTAL</b>	<b>\$13,488,263</b>	<b>\$13,067,014</b>	<b>\$13,629,757</b>	<b>\$40,185,034</b>
<b>Regional PY 2019-2020 Allocations</b>				
<b>East</b>	\$4,673,636.03	\$4,570,597.56	\$4,589,727.73	\$13,833,961.32
<b>Middle</b>	\$3,722,043.95	\$3,593,996.71	\$5,466,166.35	\$12,782,207.01
<b>West</b>	\$5,052,583.01	\$4,902,419.72	\$4,133,324.95	\$14,088,327.68

**Table 25: Program Year (PY) 2019 WIOA Title I Adult, Dislocated Worker and Youth Activities Program Allotments**

## B. For Title II

i. Describe how the eligible agency will award multi-year grants or contracts on a competitive basis to eligible providers in the State, including how eligible agencies will establish that eligible providers are organizations of demonstrated effectiveness

- - *Adult Education will establish a competition through a request for proposal (RFP) process. The competition will be for multi-year Adult Education grant awards—July 1, 2020 – June 30, 2023—for the first multi-year grant period. This competition and RFP will encompass all of the types of Adult Education funding: Adult Basic Education (ABE) / Adult Secondary Education (ASE), corrections education, and the Integrated English Literacy and Civics Education (IELCE). The RFP process will require interested parties to provide an intent to apply document that notifies the Division of Adult Education (Division) of why the applicant desires the Title II funds and establish demonstrated effectiveness.*
    - Before an organization is able to write for the RFP they must first be approved via the intent to apply document, which will require parties to provide data on how they have effectively served students. Data will be required on six competencies: three “academic” and three “outcomes”.*
    - Concerning the three “academic” competencies: When providing “demonstrated effectiveness” data, applicants must provide data on literacy, mathematics, and English language acquisition results. To be considered as having demonstrated effectiveness, an applicant must provide non-zero data in the academic competencies related to the services they plan to provide. That is, if an applicant only*

*plans to provide basic reading/writing/math services to native English speakers, then it is possible they do not provide English language acquisition data. If an applicant plans to serve only ESL students or is writing only for the IELCE grant, it is possible that they do not provide literacy or mathematics data.*

*Concerning the three “outcomes” competencies: When providing “demonstrated effectiveness” data, applicants must provide non-zero data in at least one of the three competencies in order to be considered as having demonstrated effectiveness. These three competencies are: Employment, Secondary School Diploma or Equivalent, and Transition to Postsecondary Education or Training.*

- *Data will need to reflect progress of students making educational progress, and the progress must be sufficiently supported by documentation. Based on the clarity and integrity of the data and whether the threshold established by the Division is met, parties will be approved or denied. Parties will be able to apply for the RFP if demonstrated effectiveness is established through the intent to apply process.*
- *Parties approved to apply will return applications to the Division for grading. Grading will follow procurement processes of Tennessee, and will be done with a mix of graders, some within the Department of Labor and Workforce Development and some with external agencies. Based on the scoring process, entities that meet the requirements established by the law and the Division, parties will be awarded a grant contract to offer adult education services in specified delivery areas.*

ii. Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds and how the eligible agency will ensure that it is using the same grant or contract announcement and application procedure for all eligible providers

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- *Opportunities for funding will be posted utilizing different media outlets including the internet, General Services posting services, email notification, and word of mouth. The RFP information will be available to all those interested in applying for grant funding, including transcripts of questions and answers. All information will be available despite the method of posting or communication. The information will remain static in all modes of communication, and will not add or take away from the integrity of the RFP information.*
- *The Division will have RFP opportunities posted on the Department's website, allowing access to RFP documents to any party accessing website.*
- *Notification of the RFP opportunity will also be sent out to organizations that operate in the educational sphere and local officials in order to spur interests in the program. This communication will also help with word of mouth notification of the funding opportunity.*
- *The process outlined above is the same process used for announcing Adult Education grant opportunities and application procedures to all eligible agencies in the state. The Division ensures that this process is public and statewide in scope; this ensures that the same procedure is followed for all interested, eligible parties.*

## C. Vocational Rehabilitation Program

In the case of a State that, under section 101(a)(2)(A)(i) of the Rehabilitation Act designates a State agency to administer the part of the Vocational Rehabilitation (VR) services portion of the Unified or Combined State Plan under which VR services are provided for individuals who are blind, describe the process and the factors used by the State to determine the distribution of funds among the two VR agencies in the State.

The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program is a combined state agency.

## 6. Program Data

### A. Data Alignment and Integration

Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the State's plan for integrating data systems should include the State's goals for achieving integration and any progress to date.

#### i. Describe the State's plans to make the management information systems for the core programs interoperable to maximize the efficient exchange of common data elements to support assessment and evaluation

Tennessee's web-based Virtual One-Stop System (VOS) is the most advanced and comprehensive statewide workforce development information and reporting system available today. Using a set of core proprietary software components created by Geographic Solutions Inc., the department and its partners have modernized and integrated workforce services into a single computing platform referred to as Jobs4TN.

The Jobs4TN system is modular in design and new or existing web components can be easily added or modified. For example, the system incorporates robust modules for:

##### Job Seeker and Employer Self Service

- Title I ( Adult, Dislocated Worker, Youth)
- Title II ( Adult Education)
- Title III (Wagner- Peyser)
- Trade Adjustment Assistance
- SNAP Employment and Training
- Reemployment Services and Eligibility Assessment Case Management Modules
- Unemployment Insurance Module
- Virtual Recruiter for Employers

- Labor Market Information including Labor Force Information by County, Region, and Statistical Area
- Tennessee Training Providers with Demand Occupations
- Adult Education Module
- WARN/ Rapid Response to Layoff Module
- Apprentice tracking Module (coming spring 2020)

The system also creates and deploys expansive, workforce administrator and manager tools and virtual functionalities such as:

#### Accountability and Dashboard Modules for Management

- Fund Management Tracking and Reporting
- Managed Employment Services
- Statewide Case Management
- Follow-Up and Outcomes Tracking

VOS also enhances user practical knowledge by making available state-of-the-art, online assessments, as well as outcome tracking of Aptitude and Basic Skills tests, which are easily recorded for search and viewing by authorized staff and employers. Paperless case management, source document management and data validation features position the department and contractor staff for further deployment of business efficiencies through managed upgrades and modifications to the system. The system produces all the quarterly and annual federal reports. VOS is a robust web-based computing system with strengths in ease for its end users. The system also allows for scalable interfaces with other agencies in state government which will further align data systems.

The State is aware that Section 116(i)(1) of WIOA requires the core programs, local boards, and chief elected officials to establish and operate a fiscal and management accountability information system based on guidelines established by the Secretaries of Labor and Education. Financial systems across the State meet the requirements set forth in the Uniform Administrative Requirements (2CFR § 200.302). In recognizing the need to continuously improve upon the accounting systems and reporting capabilities from LWDAs statewide, the Division of Workforces Services of the Tennessee Department of Labor and Workforce Development will look to implement an electronic Grants Management System (GMS). The grants management system project will utilize Software as a Service (SaaS) delivering the relevant applications over the Internet. The application will be a full lifecycle grants-management system that is web-based and configurable to a specific client's needs. The integration of the grants management system will assist greatly in the following:

- providing continuous improvement in operational efficiency;
- providing a single system capable of supporting a full range of programs and services with limited customization required to roll-out future programs;
- increasing visibility and providing actionable data to staff; and
- increasing productivity and faster response time due to streamlined processes.

Being tightly aligned with the Governor's fiscal priority to make State government more customer-focused, efficient and effective, GMS allows for enhanced service delivery by enabling automated

workflows, tracking of grant funding, expenditure reporting, procurement, and inventory/asset management.

The department's web-based Virtual One-Stop System (VOS) is the most advanced and comprehensive statewide workforce development information and reporting system available today. Using a set of core proprietary software components created by Geographic Solutions Inc., the department and its partners have modernized and integrated workforce services into a single computing platform referred to as Jobs4TN. Working from the WIOA statutes, we have moved forward with establishing needed data points in our systems and continually work with our vendor to collect required data as the reporting requirements continually change.

VOS is a robust web-based computing system with strengths in ease of use and in its potential for future partnerships with internal units such as Unemployment Insurance, Adult Education, and potentially scalable interfaces with other agencies in state government.

Reporting across the six core programs will be led by the Tennessee Department of Labor and Workforce Development, Workforce Services Division. This combined plan outlines reporting under the common measures for all core partners. Extract file creation and the processes needed for submittal of WIOA reports for Titles I and III already are in place. The partnership existing between Titles I and IV has identified the accountability requirements and data infrastructure of the Title IV program reporting, with the objective of having rehabilitation services extraction files mostly ready for upload in the first quarter of WIOA reporting under the common measures. However, we reserve the right to modify these data collection and reporting plans based on future publications of final rules or changes in reporting requirements.

The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program is in the process of implementing a new case management system called Aware, scheduled to go-live in June 2021. The new system will offer the opportunity to create interfaces with core program partners to maximize the efficient exchange of necessary data elements. VR has a data sharing agreement already in place with DOL to access the Wage Record Interchange System.

## **ii. Describe the State's plans to integrate data systems to facilitate streamlined intake and service delivery to track participation across all programs included in this plan**

Tennessee has adopted a Virtual One Stop Data Collection system (VOS) referred to as Jobs4TN that provides an integrated solution for all federal workforce programs in the AJCs. This virtual recruitment tool allows employers to browse the profiles of prospective candidates or post job openings. Through this online portal, a company can search for résumés or receive notices for submitted résumés that best match the criteria of the job post. Employers can even specify how often they would like to receive updates concerning submissions (e.g. once a day, once a week, etc.).

The development and implementation of this technology-based data and case management system has transformed the way information is collected and shared across programs. The system fully integrates Adults, Dislocated Workers, Youth, Veterans, Wagner- Peysner, SNAP E& T, TAA, RESEA, labor market information, Adult Education and Unemployment Insurance programs under one system. The system uses a common intake or registration section which prepopulates information for participants when applying for other programs in the jobs4tn system. This has saved the state time and resources cutting down on the duplication of data entry. Also with Tennessee expanding the apprenticeship programs throughout the state the department will be working on the build out of the apprenticeship reporting module which is scheduled to be implemented in winter of 2020.

The addition of the Adult Education program (July 1, 2017) and interfacing of Vocational Rehabilitation services (date TBD) in the near future will establish a more integrated and seamless system for data and program information management. Tennessee has worked diligently to build on the Governor's launch of Jobs4TN.gov; improvements include the addition of modules and components to move to a real-time system of data collection, allowing identification of trends and quicker response to the customers being served. The public Workforce System is well served to encourage both job seekers and business to utilize the resources provided within Jobs4TN.gov. This trend has been strong over the last several years as more customers use technology to seek employment; Tennessee is well positioned through this platform to quickly identify, respond to, and enhance the customer's experience engaging in job searches and training. As such, the strategy for data integration was to build a central data warehouse which will be used for a common intake of the participant's individual record that could be pulled as needed by each core partner as soon as all the core partners are on board resulting in participant data access for each core partner staff.

Tennessee also plans to interface with other partners which will establish an even more integrated and seamless system for data and program information management. Tennessee has worked to build a system with real-time data collection, allowing identification of trends and quicker response to the customers being served. The public Workforce System is well served to encourage both job seekers and business to utilize the resources provided within Jobs4TN.gov. This trend has been strong over the last several years as more customers use technology to seek employment; Tennessee is well positioned through this platform to quickly identify, respond to, and enhance the customer's experience engaging in job searches and training.

Tennessee continues to look at ways different technologies that can be used to integrate systems to enhance the customer experience. The department has launched a system called Workforce One-Touch. The system is a customer service ticketing system which takes all kinds of requests such as emails, phone calls and work tickets to create a customer profile for each customer. This system allows TDLWD to store all support questions and requests in one place for staff assistance and reference. Within assigned groups or divisions in the system, staff can quickly respond to businesses and customer requests for assistance or easily assign the request to the appropriate staff member. The ease in sharing such requests allows the Department to render quicker, better customer service. It also provides a record of progress for various communications to increase collaboration and streamline all responses. This system provides customer service and satisfaction metrics that create workflow improvements and increase efficiencies across the department. In addition to coordinated request responses, Zendesk also includes a live-chat feature which provides the following benefits:

- Proactive engagement -initiate a chat with a customer who may need help
- Customer convenience -chat is a fast way to provide customer service in real time
- Agent productivity -reach more customers by easily managing multiple chats

Zendesk Chat also offers helpful features including:

- Automatic chat triggers that message visitors on specific pages of the Department's website.
- Agent-to-agent chat for team collaboration in real time
- Automatic translations of chat conversations
- Shortcuts that speed up chat conversations
- The ability to route chats to specialists

The Department of Labor and Workforce Development is now able to leverage these systems to conduct proactive outreach. Through a statewide outreach program known as the Virtual American Job Center, agents are able to identify and engage with job seekers to provide a channel of direct personal contact to a career specialist in the user's local area. It is with this technology that our department is assisting to meet the Governor's rural initiative.

In order to have the most efficient and effective workforce system the department transitioned to paperless record keeping by using an electronic document imaging and storage system. TDLWD elected to utilize electronic documents and requires electronic verification of eligibility requirements. Electronic records allow for remote auditing and organized files. Jobs4TN allows internal and external access to provide service partners the means to efficiently administer services to their participants. The Jobs4TN system eliminates the need for paper applications for registration and ensures that all Local Workforce Development Boards (LWDBs) are using identical criteria to determine participant eligibility. Customers will receive the same high-quality, efficient service regardless of the local area in which they reside. In order to case manage participants; LWDBs and the American Job Center (AJC) System are using Jobs4TN to:

- Create participant applications
- Record provided services
- Upload supporting documentation to verify eligibility
- Provide case notes regarding interactions with participants
- Deliver labor market information

As stated above three of the core partners have adopted Jobs4TN as their management data collection system to support the workforce development activities. The Integrated data system is used to develop a streamlined universal intake and assessment process to align the service delivery and track participation across all programs. Each partner agency will be able to conduct analysis, evaluate data, engage service providers and prepare data for internal and state uses, as well as meet its unique reporting requirements for their corresponding federal agencies. In addition, to ensure the One-Stop Service Delivery system operates effectively, parties to the MOU are required to provide performance information from Jobs4TN that supports the achievement of performance goals. Data must be consistent with the requirements of the law. All parties must agree to work cooperatively, to share data to the extent necessary -and as permitted or required -by applicable statute or regulation, and enter into data sharing agreements as required in Jobs4TN. All mandatory Partners must agree to meet data collection and reporting needs of WIOA via utilization of Jobs4TN. Collection of data in Jobs4TN includes the addition of activities to participants' files to ensure that all services to participants are documented, as well as the use of VOS Greeter to track the number of participants using the AJCs.

Each agency's case management system could then build upon the common data program specific information. The data from these case management systems necessary for reporting would then be merged and matched for analysis, evaluation, and reporting on the WIOA program as a whole.

In addition, to ensure the One-Stop Service Delivery system operates effectively, parties to the MOU are required to provide performance information from Jobs4TN that supports the achievement of performance goals.

The Tennessee Department Human Services (TDHS) is in a period of transformation, moving toward a more integrated service delivery model referred to as "One DHS" that is focused on modernization efforts agency-wide that will dramatically impact that way that human services are delivered and received by Tennesseans. Agency-wide, DHS is striving to improve customer interaction, making it

less bureaucratic and more customer-friendly, efficient, and effective. While these modernization efforts come with enhanced technology to help create a more efficient service delivery model overall, the driving force behind the initiatives taking place is to ensure that the customer we are serving is at the center of any and all improvements being made.

### iii. Explain how the State board will assist the governor in aligning technology and data systems across required one-stop partner programs (including design and implementation of common intake, data collection, etc.) and how such alignment will improve service delivery to individuals, including unemployed individuals

The state board will continue to look at ways to meet the Governor's goal of aligning technology and data systems across partner programs. Under the state workforce board's committee structure is the innovation committee. One of the roles as a sitting member of this committee is to continue to look at ways to align systems improving service delivery and providing good data to make informed decision making. Over the past few years Tennessee has been a leader among other states having a fully integrated system. As an example, as a participant files their claim for unemployment insurance they are at the same time providing the information to register them as a Wagner Peyser participant. Having the two programs in the same system removes the need to interface with other systems and removes the risk the information not transferring correctly.

Information on how the State board will assist with technology alignment and data systems is included in the response to question 1 in this section.

### iv. Describe the State's plans to develop and produce the reports required under section 116, performance accountability system. (WIOA section 116(d)(2))

Reporting across the six core programs will be led by the Tennessee Department of Labor and Workforce Development, Workforce Services Division. The Tennessee combined plan outlines reporting under the common performance measures for all core partners. Extract file creation and the processes needed for submittal of WIOA reports for Titles I, II and III will be done in the jobs4tn system. The state has developed a process where extract files for each program are downloaded each night to a secure location through an ftp secure file transfer at the state. After the state does an initial review of the file for correctness it is then uploaded to the federal WIPS system where it has to pass all the federal logical and valid edit checks.

In an effort to meet the all WIOA performance requirement Tennessee has successfully implemented the SWIS data sharing agreement. This agreement and process will provide core partners with the out of state wage information necessary to meet the federal reporting requirements. TN Department of Labor will process SWIS wages and provide them to Vocational Rehabilitation and Adult Education each quarter which will be combined with wage data and then be inserted into their extract files that will be used in the calculation of the performance outcomes.

Information about the State's plans to develop and produce required reports is included in the response to question 1 in this section.

Section 116 of WIOA establishes performance accountability indicators and performance reporting requirements to assess the effectiveness of States and local areas in achieving positive outcomes for individuals served by the workforce development system's six core programs. The performance accountability guidelines require state departments to establish data validation guidelines to ensure

the information contained in program reports is valid and reliable. The VR Services Program is currently working to develop internal data validation procedures consistent with these guidelines. These procedures will cover the ongoing collection and documentation of all required data, an assessment of previous and current case documentation, a description of the process for identifying and correcting errors or missing data, annual training for program staff, and will establish a system for ongoing monitoring and regular assessment of the effectiveness of the data validation process.

## **B. Assessment of Participants' Post-program Success**

Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.

The Departments of Labor & Workforce Development, Education, Economic & Community Development, Human Services/TANF, Adult Education, and Vocational Rehabilitation are poised to offer educational and employment transitional services. Much of the progress of participants will be tracked through the state's P-20 system, a longitudinal database which increasingly will incorporate workforce data to help to identify, assess, and certify skills for successful careers, and help to promote economic development by connecting workforce development with job creation and growth. Further, the Drive to 55 initiative will increase employer engagement with the workforce development system and expand programs of study that bring together a sequence of career-focused courses that start in high school and extend through college. The Tennessee Department of Education, Division of Career and Technical Education will follow up on youth completers with the emphasis toward continuing competency models in STEM fields; Adult Education will focus on the making sure that they are increasing literacy among adults so that they can achieve their educational goals. Having them prepared to enter into postsecondary education and providing the employers with the talented workforce they need. Vocational Rehabilitation Services, a division of the Tennessee Department of Human Services, is offering full transitional services to youth and adults to help to prevent individuals from dropping out of the programs at crucial times in their education and work life. Tennessee will utilize the Performance Reporting and flexible Ad Hoc Reports module within Jobs4TN to track participants who are exiting from core programs, completing postsecondary education, or entering employment in accordance to the Common Measures under WIOA

In addition to participant performance data, TDLWD WIRED has worked with staff at the P-20 project to produce a report by each of the approximately 200 programs of study of the number and percent of high school CTE completers, community college, TCATS, four year colleges and universities who are employed two quarters after completing their educational programs. Individuals continuing on to another level of education are excluded. The report also provides earnings information by degree level for these programs of study. This is the second year the information has been available; discussions will take place on reviewing and sharing these student outcome data. It would be enhanced by the ability to include wage data from other states as well.

The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program currently tracks wage data and credential attainment for four quarters after an individual exits the program. This data is used to assess the progress of individuals receiving VR services who have successfully achieved an employment outcome. VR is currently in a baseline year for wage and credential attainment data.

## **C. Use of Unemployment Insurance (UI) Wage Record Data**

Explain how the State will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)

Accurate wage record data is the gold standard for assessing participant progress (WIOA 116(i)(2)) and accurate performance outcomes. As the regulations make clear the requirement that states use the confidential UC quarterly wage record data to prepare and submit performance reports. Tennessee's plan to utilize wage record data, which includes SSNs, wages, and employer information such as the FEIN, is founded in compliance with confidentiality provisions in 20 CFR Section 603, as well as in accordance with the requirements of the SWIS (State Wage Interchange System) data sharing agreement. Tennessee was one of the early states to sign and implement the SWIS data share agreement on 8/19/2019 which will take the place of the WRIS and WRIS 2 agreements. This agreement will allow all the core partner programs the ability to receive out of state wage records for the purpose of performance reporting for our core partner programs.

The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program has a data sharing agreement in place with the Department of Labor that provides the opportunity to access quarterly state UI wages record data for the individuals receiving DRS services. VR also completed the SWIS agreement which allows the VR Services Program to track the wages of individuals who gain employment outside the state of Tennessee. The SWIS agreement provides VR with access to wage data from all states outside of Tennessee that have also agreed to share this information.

By receiving this data, the VR Services Program will be able to assess wage progress for individuals who successfully achieved an employment outcome after they are no longer receiving services from VR.

## D. Privacy Safeguards

Describe the privacy safeguards incorporated in the State's workforce development system, including safeguards required by section 444 of the General Education Provisions Act (20 U.S.C. 1232g) and other applicable Federal laws.

Tennessee has updated the Privacy Policy to adapt to new technology and any changes in accordance with WIOA. The Privacy Policy will also incorporate the [https://www.tn.gov/assets/entities/finance/oir/attachments/PUBLIC-Enterprise-Information-Security-Policies-v2.0\\_1.pdf](https://www.tn.gov/assets/entities/finance/oir/attachments/PUBLIC-Enterprise-Information-Security-Policies-v2.0_1.pdf) as provided by the State of Tennessee, Department of Finance and Administration Office of Information Resources.

This information is as follows:

Objective: To provide management direction and support for information security in accordance with agency business requirements and relevant state and federal statute and regulations for the State of Tennessee's computing environments.

OIR Information Security Management will initiate and control an enterprise information security architecture that includes, but is not limited to, a policy framework, an organizational and communication framework and a security technology framework.

Agencies may develop agency-specific policy documents as required by the agency or regulatory requirement provided the minimum requirements set forth in this document are met.

Agencies are responsible for communicating this policy document throughout their respective agencies.

## 7. Priority of Service for Veterans

Describe how the State will implement and monitor the priority of service provisions for veterans in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor. States should also describe the referral process for veterans determined to have a significant barrier to employment to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist.

Veterans and other eligible persons, defined as covered persons, are ensured Priority of Service (POS) upon entering the Workforce System with the implementation of the following services:

- Identified at the point of entry to programs & services
- Made aware of priority of service
- Made aware of full array of programs and services available to them
- Take precedence over non-covered person in accessing and obtaining services

Covered person means any of the following individuals:

1. A veteran
2. The spouse of any of the following individuals:
  - a. Any veteran who died of a service-connected disability
  - b. Any member of the Armed Forces serving on active duty who, at the time of application for assistance under this section, is listed, pursuant to section 556 of title 37 and regulations issued thereunder, by the secretary concerned in one or more of the following categories and has been so listed for a total of more than 90 days:
  - c. Missing in action
  - d. Captured in line of duty by hostile force
  - e. Forcibly detained or interned in line of duty by a foreign government or power
  - f. Any veteran who has a total disability resulting from a service-connected disability.
  - g. Any veteran who died while a disability so evaluated was in existence.

POS is defined as:

- The right to take precedence over non-covered persons – Depending on the type of service or resource being provided, taking precedence may mean:
- Covered person gains access to services or resources earlier than the non-covered persons when resources are limited
- Priority of Service applies to every qualified job training program funded, in whole or in part, by the Department of Labor
- The proposal states that those with the greatest need should receive priority of service in programs for which they are eligible.

All covered persons are to receive POS at any “point of entry”, which includes physical locations, such as AJCs, as well as websites and other virtual service delivery resources. They must also have access to adult and dislocated worker programs.

POS is the responsibility of each staff member within the AJC with oversight and compliance provided by the One-Stop Operator. Reports and on-site reviews ensure adherence to mandated legislative requirements.

JVSG staff work closely with all WIOA partners providing training on current issues that affect Veterans and other eligible persons. The spirit of assisting Veterans and providing priority of service is primarily a legal requirement, but also a moral imperative and meaningful way of doing business.

Priority of Service is monitored by the State Veterans Services Coordinator, who examines Local Board policies and procedures, reviews reports produced through Jobs4TN, conduct on-site monitoring and checks all websites developed with funding from impacted programs or grants to ensure priority of service is provided to Veterans.

WIOA Title I Adult program provides priority services for public assistance recipients, other low-income individuals, or individuals who are basic skills deficient. These participants would receive first priority for services in the order below:

- First, to veterans and eligible spouses who also are included in the groups given statutory priority for WIOA adult formula funds. This means that veterans and eligible spouses who also are recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority for services provided with WIOA adult formula funds.
- Second, to non-covered persons (individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.
- Third, to veterans and eligible spouses who are not included in WIOA's priority groups.
- Fourth, to any other populations identified by the Governor or Local Board for priority. Lastly, to non-covered persons outside the groups given priority under WIOA.
- Lastly, to non-covered persons outside the groups given priority under WIOA.

## 8. Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) with regard to the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria.

Reasonable accommodations are provided for all aspects of a customer's experience in the American Job Center (AJC), such as during application/registration for, and provision of, aid, benefits, services, and training. The AJC takes appropriate steps to ensure people with disabilities, including persons who are deaf, hard of hearing, or blind, or who have other sensory or manual impairments, have an equal opportunity to participate in our services, activities, programs, and other benefits. Availability of auxiliary aids and services are promoted through notices and printed materials. Sign language interpreters can be scheduled, and the AJC utilizes relay services for external telephone with TTY users through the state relay service, or using text, email, etc. Persons who are blind or visually impaired may be read to by staff. Staff may also assist customers with difficulty manipulating print materials by holding materials and turning pages as needed, or by providing one or more of the following: note-takers, speaker phones, or other effective methods to ensure effective communication by individuals with manual impairments. During Certification of our AJCs, we partnered with the Department of Human Services Division of Vocational Rehabilitation (VR) to provide on-site ADA reviews of all facilities, Comprehensive, Affiliate and Specialized Centers to ensure services were accessible to individuals with disabilities; staff was ready to accommodate individuals with disabilities; signage was posted to make individuals aware of accommodations for individuals with disabilities. VR made recommendations and provided follow up visits, if recommendations were required. AJCs ensure materials are available in alternative formats, adjustable computer work stations are accessible in the resource room, computers are equipped with Windows Ease of Access features which include magnification, narration, and on-screen keyboards and/or EVAS computer system which is specifically designed for the visual, physical, hearing or learning disabled. Some AJCs have installed the Purple Software for persons who are hearing impaired with a Web-Cam available for video/visual interpreter assistance. All AJCs have access to the AVAZA Language Line and Interpreting: HIPAA, ADA and Title VI compliant; a great solution for LEP and/or Deaf and Hard of Hearing Community; has trained medical interpreter available for on demand or scheduled sessions 24/7/365 access.

Accommodations are made according to individual need in order to ensure the customer receives equal benefits from the program or activity, and will be able to compete fairly. Auxiliary aids and services are available upon request to individuals with disabilities. The AJC staff participates in annual trainings related to providing service to customers with disabilities. The Local Workforce Development Board coordinates with the broader community, including transportation agencies and existing public and private sector service providers including Social Security Administration's Employment Network for the Ticket2Work program, to ensure that the AJC and services are accessible to all customers, including those with disabilities.

The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program provides on-going assistance to the Local Workforce Development Boards for the American Job Center (AJC) certification process by conducting accessibility and accommodation surveys to ensure that physical and programmatic accessibility of facilities, programs and services accommodates people with disabilities.

Physical accessibility includes an examination of external and internal barriers. External accessibility factors include topography, accessible parking, travel routes to the entrance and entrance accessibility. Internal physical accessibility factors include: travel and facility use barriers in reception

areas, resource rooms, hallways, class and conference rooms, offices, rest rooms and drinking fountains; appropriate room identification signage; and emergency alarms and egress planning.

Programmatic accessibility includes an examination of accommodations, and notifications of accommodations, for individuals with physical or sensory disabilities for computers, written or visual communication, and training. Accommodations may include screen readers and magnifiers, larger monitors, alternative key boards, track ball mouse, Brailled or large print documents, sign language interpreters, adjustable computer work stations, text or video phones, closed captioning and FM assistive listening systems.

The VR Services Program provides: training on disability awareness; consultation on assessing and employing people with disabilities, employer engagement and education, assistive technology, benefits planning, tax incentives and Ticket-to-Work; and assistance with obtaining Brailled documents and scheduling sign language interpreters.

The VR Services Program provides AJCs electronic and face-to-face links to the VR program statewide. VR ensures that all affiliate and comprehensive AJCs are aware of how to contact VR and make referrals of people with disabilities. Co-located VR staff at comprehensive AJCs work together with all co-located partners to provide seamless services for people with disabilities through collaboration on referrals, program eligibility, program planning, available services and shared funding, when appropriate.

## 9. Addressing the Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

Basic Career Services are made available, such as Initial assessment of skill levels (including literacy, numeracy, and English language proficiency), aptitudes, abilities (including skills gaps), and supportive service needs, Labor exchange services, including job search and placement assistance, career counseling, provision of information on in-demand industry sectors and occupations, provision of information on nontraditional employment. Improved availability, a welcoming atmosphere, inclusive settings, and high quality customer service benefit all customers. This extends services and outreach not just to individuals who walk in the door, but also to those who have become disengaged in the labor force. Integrated, quality services are provided to all customers within the center and via technology through online or phone access. Principles of universal design are considered when designs have inclusive space and materials available to individuals regardless of their range of abilities, mobility, age, language, learning style, intelligence, or educational level. Individualized Career Services include Comprehensive and specialized evaluation to Identify barriers to employment and employment goals, Individual Counseling, Internships and work experiences, Development of Individualized Employment Plan (IEP), Career/Vocational Planning, Workforce preparation activities, Financial literacy services, follow up services, English language acquisition and integrated education and training programs. Additional individualized career services also include HiSET testing on site, Mock Interview, Dress for Success and Resume assistance workshops.

All AJCs have access to the AVAZA Language Line and Interpreting: HIPAA, ADA and Title VI compliant; a great solution for LEP and/or Deaf and Hard of Hearing Community; has trained medical interpreter available for on demand or scheduled sessions 24/7/365 access.

#### *Procedures:*

*Adult Education services available in comprehensive American Job Centers will include providing initial math, reading, and English language proficiency assessments to WIOA customers. For English language learners, this assessment is the CASAS, which provides a screening of the learners' English language oral, reading, and writing skills, and a comprehensive analysis of their reading and listening skills.*

*Customers who desire to improve their English language skills will be referred by American Job Center staff to a local Adult Education English-as-a-Second-Language (ESL) program. Some areas of the state will also have Integrated English Language and Civics Education programs available for students; these programs will help students learn about American civics, rights, and responsibilities, provide integrated education and occupational training opportunities, as well as provide ESL instruction. Adult Education program staff will also coordinate with other WIOA partner programs at the American Job Centers to ensure English language learners have access to wraparound services, and are referred to other programs that could improve their workforce preparation and career opportunities.*

#### *Staff Training:*

*American Job Center staff who will have initial interactions with English language learners will be trained on basic intake procedures, including ensuring that the learners are given the appropriate intake screening and CASAS assessments. Staff members who administer screening and CASAS assessments will be trained in accordance with the state's Adult Education Assessment Policy in order to ensure reliable and customer-focused practices. Adult Education staff members who instruct English language learners in ESL activities must meet the state's minimum qualifications, in accordance with the Adult Education Instructor Qualifications Policy. These qualifications include holding a minimum of a bachelor's degree, and having active educator licensure or TESL/TEFL certification. For instructors who do not meet these qualifications, a waiver process will be offered to allow prospective instructors to do basic training in ESL and adult learning.*

#### *Resources:*

*The Adult Education program will ensure that program materials are made available at all American Job Centers and are translated and made available in some of the more common native languages spoken by local English language learners.*

*The Tennessee Department Human Services (TDHS) - Vocational Rehabilitation (VR) Services Program provides on-going assistance to the Local Workforce Development Boards and the American Job Center (AJC) by conducting accessibility and accommodation surveys to ensure that physical and programmatic accessibility of facilities, programs and services accommodates people with disabilities, including English language learners. Additionally, VR partners with Tennessee Disability Pathfinder to provide free information, resources, support, and referrals to Tennesseans with disabilities of all ages, all types of disabilities, and all languages spoken. To address the needs of Tennessee's growing multicultural population, Tennessee Disability Pathfinder provides cultural awareness, education, training, and one-on-one help. Regardless of nationality or language spoken, free assistance for individuals with disabilities and their families is just a phone call away. Tennessee Disability Pathfinder also includes a state-wide online database catering to the Spanish-speaking population, which covers disability issues, and mental health and social services. It offers information about agencies and its bilingual staff (English and Spanish). By linking individuals directly to culturally competent Spanish-speaking providers, obtaining resources becomes much easier. Lastly, Tennessee Disability Pathfinder provides assistance to non-profit agencies striving to serve more culturally diverse populations.*

# IV. Coordination with State Plan Programs

Describe the methods used for joint planning and coordination among the core programs, and with the required one-stop partner programs and other programs and activities included in the Unified or Combined State Plan.

*WIOA Workgroups convene on a quarterly basis to ensure the five key objectives defined by the Governor's SWDB are addressed. These objectives include: 1) Create an Integrated Intake System to Efficiently Deliver Services; 2) Create a Shared Vision for Supporting Tennesseans with the Greatest Number of Barriers to Enter the Workforce; 3) Create a Trained Workforce to Meet Current Industry Needs; 4) Create New Dashboards to Measure the Effectiveness of the Integrated Workforce Strategy; and 5) Create a Simple and Effective Engagement Experience for All Candidates. The five (5) workgroups meet separately with respective workforce partners and report out to the respective SWDB Committees during the SWDB quarterly meetings:*

- *Fiscal & Reporting (Oversight Committee)*
- *Joint Monitoring & Compliance (Oversight Committee)*
- *AJC's Service Delivery and Integrated Workforce Strategy (Operations Committee)*
- *Apprenticeship & Work-Based Learning (Operations Committee)*
- *Data & Performance (Innovations Committee)*

*The workgroups will meet prior to each quarterly SWDB meeting, providing progress updates that are taking place to address the five (5) SWDB objectives.*

*In addition to the WIOA State Workgroups, the three (3) Regional Planning Councils (RPCs) meet quarterly with their regional partners (WIOA, Adult Education, Wagner Peyser, Vocational Rehabilitation, TANF, Career Technical Education, Economic Community Development, Chambers of Commerce, etc.). Each RPC is organized somewhat differently, however, their focus is centered on regional planning and coordination through the work of subcommittees at the Executive, Operations, Innovations, Career Services, and Strategic Planning levels. RPC's will provide quarterly progress reports to the state which will be reviewed to determine progress of regional partnerships. Technical assistance will be provided to the RPCs where performance and/or other operational goals are not meeting the objectives of their respective regional plan. Likewise, where RPC's are demonstrating best or promising practices, these will be shared among the WIOA workgroups as well as with other regional planning areas within the state.*

*The TDLWD Adult Education Division will participate in focus groups and work groups with the other state-level WIOA partner programs as necessary to ensure a strong and effective coordination of system services across the state. Local Adult Education programs will participate in partner collaboration in like manner on a local level. The Adult Education program will share relevant data concerning student participation, performance, co-enrollments, and transitions to postsecondary education and training programs. The Adult Education program will work in conjunction with partner programs to create, implement, assess, and revise effective referral and co-enrollment tools and processes. Adult Education will work to ensure that local program staff across the state are trained and provided with resources necessary to understand the various WIOA programs, and to ensure that they know when and how to help students access those programs.*

The Tennessee Department of Human Services (TDHS) Vocational Rehabilitation (VR) Services Program as a core partner has staff co-located in all comprehensive American Job Centers (AJC). At the regional level VR staff participates in Local Workforce Development Area Boards and partner meetings. Through this participation they collaborate in planning for local activities, referrals, cross informational training, local area plans, employer services, and state and local initiatives. At the state level the VR Services Program administrative staff works closely with TN Department of Labor and Workforce Development (TDLWD) and other core partner staff on integrated customer service planning and data sharing. In 2019 the VR Services Program aligned its regional boundaries with TN Economic Community Development and TDLWD regions to further facilitate coordination on local economic, program and service provision planning, development, and partner representation. The VR Services Program's Business Services Unit works closely with the Tennessee Department of Labor and Workforce Development and other partners to develop and implement programs and services for employers. The VR Services Program provides accessibility and accommodation surveys for AJCs to ensure that individuals with disabilities have full access to services and programs.

## V. Common Assurances (For All Core Programs)

The Unified or Combined State Plan must include assurances that:

The State Plan must include	Include
1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes

The State Plan must include	Include
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes
8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;	Yes
9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;	Yes
10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);	Yes
11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and	Yes
12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	Yes

## VI. Program-Specific Requirements for Core Programs

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

### Program-specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B

The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B—

#### a. General Requirements

##### 1. Regions and Local Workforce Development Areas

A. Identify the regions and the local workforce development areas designated in the State

Tennessee has nine (9) local workforce development areas and three grand regions - East, Middle, and West. The map below depicts the designations across the State. LWDAs Northeast, Southeast and East comprise the East Region, LWDAs Upper Cumberland, Northern Middle, Southern Middle comprise the Middle Region, and LWDAs Southwest, Northwest and Greater Memphis comprise the West Region.



Figure 5A – Nine TN Local Workforce Development Areas (LWDAs)

B. Describe the process used for designating local areas, including procedures for determining whether the local area met the criteria for “performed successfully” and “sustained fiscal integrity” in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions

The State Workforce Development Board (SWDB) elected in February 2018 to review the alignment of Tennessee’s Local Workforce Development Areas (LWDA). The decision to review the alignment partially arose from a local government requesting to change LWDAs in order to better align their resources with Tennessee’s Economic Development Job Base Camps (ECD Base Camps).

During the time period from February 2018 up to the SWDB quarterly meeting on May 11th, 2018 the SWDB completed an extensive analysis of our workforce development areas, federal and state resources, and labor market data. Furthermore, the SWDB reviewed Tennessee's capacity to serve citizens in the areas of workforce development, economic development, and access to higher education and training services. As part of this analysis, input was sought from local county mayors, local workforce development board chairs and community leaders across the state. The public meetings focused on aligning LWDA's with the ECD Base Camps and also demonstrated how the shift would coincide with the adult education and career pathways regions. The parties were also informed of the analysis and considerations being made by the SWDB in terms of labor market analysis and workforce trends. The major takeaway from each of these meetings was that Tennessee needs to further enhance its regional development capacities and optimize opportunities to share and leverage resources in the areas of workforce development partnerships while continuing to create access to services and opportunities in rural areas.

Upon completion of this analysis, at their May 11th SWDB meeting, the board elected to recommend realignment of the current thirteen LWDA's with the nine ECD Base Camps supporting the state vision of regional service delivery/alignment.

The Workforce Innovation and Opportunity Act (WIOA) required the Governor, in partnership with the State Board and in consultation with the Chief Elected Officials (CEOs), to develop a policy for initial designation of the Local Workforce Development Areas. WIOA requires that existing federally recognized workforce areas are designated during the first two program years; this designation is referred to as Initial Designation. The WIOA states that a unit of general local government (including a combination of such units) or a grant recipient that requests but are not granted designation of an area as a local area, may submit an appeal to the State board under the appeal process established in this policy. The public comment period must offer adequate time for public comment prior to designation of the local workforce development area and it must provide an opportunity for representatives of interested business, education, and labor organizations to have input into the development of the formation of the local area.

#### Initial Designation

WIOA requires that existing federally recognized workforce areas are designated during the first two program years; this designation is referred to as the Initial Designation.

1. Once the LEO(s) and Local Board are consulted, the local area will put the request out for public comment for a minimum of 30-days.
2. Once the public comment period has passed, the local area shall submit to the Commissioner a letter from the local area's Chief Local Elected Official, requesting: a. Initial designation of a specified county listing; b. Contain a statement that the current configuration has met fiscal integrity and performed successfully; c. Contain a description of their public comment process, and d. Contain an attachment of the public comments. *As stated in the Workforce Services Memorandum WIOA Inventory and Re-alignment dated June 18, 2018, Fiscal Integrity is achieved when the fiscal agent has no audit findings within the past two (2) years as evidenced by documented history of any audit findings during last two (2) years. Furthermore, the fiscal agent must not be on any federal or state disbarment lists. In the same memorandum, in order to have been considered to perform successfully, the respective local area must have met or exceeded the levels of performance the Governor negotiated with the respective LWDB and the elected official under WIA sec. 136(c) for the last 2 full program years. In addition, the local area must not have failed any individual measure for the last 2 consecutive program years.*
3. Once the Commissioner receives a letter from each local area, and upon approval, he will submit a letter of recommendation to the Governor to request Initial Designation. This will satisfy the

requirements in accordance with WIOA section 106(b)(2). This Initial Designation as a local area will remain valid until June 30, 2016.

The state of Tennessee is divided into three sections called the Grand Divisions. These divisions are legal as well as geographic and cultural and date back to the earliest period of European settlement.

It's no coincidence that the geographical divisions of the state follow geological lines. Because of differences in geology and resources, the distribution of industrial and agricultural products varies widely.

East Tennessee includes the Southern Appalachian Mountains (also called the Great Smoky Mountains, which encompass more than the Great Smoky Mountains National Park), the eastern Tennessee River valley, and a portion of the Cumberland Plateau, with soils less-suited to large-scale commercial agriculture than Middle or West Tennessee. Important natural resources in this area are timber, coal, and zinc. Many people make their living in the timber and mining industries, and in science and technology. The Great Smoky Mountains National Park also provides jobs in tourism. Tourism is a very important component of the East Tennessee economy.

Middle Tennessee includes the remainder of the Cumberland Plateau and the low-lying area called the Central or Nashville basin, completely surrounded by the Highland Rim. Rolling hills and fertile valleys dominate the landscape. Though the Grand Divisions roughly divide the state into thirds, Middle Tennessee is the largest division with approximately 41 percent of the state's landmass. Middle Tennessee has the largest and most varied economy in the state. The Nashville Basin has land that is good for farming. Many people work in manufacturing in the Highland Rim. Nashville has the state's second-largest population and provides jobs in government, business, education, healthcare, tourism, and the music recording industry.

West Tennessee is bounded by the Mississippi River and the western Tennessee River valley and is the lowest-lying of the three divisions. Part of the Gulf Coast Plain, it was the last part of the state to be settled by Europeans. As part of the Mississippi River basin, West Tennessee enjoys rich soil that led to large-scale cotton farming during the antebellum period and remains agriculturally significant today. West Tennessee has a mild climate and a fair amount of rainfall. These conditions allow people in this region to earn a living from farming. One major industry is food processing. Some people manufacture goods such as plastics, automobile parts, and paper goods. The Mississippi River, which runs along the entire western border of the region, is advantageous for employers requiring transportation of products by barge. The Port of Memphis on the Mississippi River serves as an asset to both regional employers as well as outside employers doing business in the region.

The letter below was signed by Governor Bill Haslam on May 24, 2018 to realign the LWDA's.



**BILL HASLAM**  
GOVERNOR  
STATE OF TENNESSEE

May 24, 2018

**To:** Tennessee County Mayors

**CC:** Local Workforce Development Board Chairs  
Burns Phillips III, Commissioner of Labor and Workforce Development  
State Workforce Development Board Members

**Re:** Realignment of Local Workforce Development Board Areas

As I outlined in my State of the State address in January 2018, Tennessee has experienced great success in education, workforce development, and job growth. We are on a pathway to meet our Drive to 55 goal two years early, which means 55 percent of Tennesseans will have a postsecondary degree by 2023. Tennessee has a job growth rate greater than 17 percent, far above the national average, with nearly 400,000 net new private sector jobs created since 2011. Last year, more Tennesseans had a job than at any other point in state history. Additionally, we ranked first in the nation for new jobs resulting from foreign direct investment. And, during 2017 alone, 45 percent of Tennessee's new job commitments were located in our rural communities. However, in order to continue to build upon this success for future generations, there is still much work to be done.

In February 2018, the State Workforce Development Board (SWDB) elected to review the alignment of Tennessee's Local Workforce Development Areas (LWDAs). The impetus for looking at statewide realignment partially arose from a local government, Grundy County, requesting to change its LWDA in order to better align its resources with Tennessee's Economic Development Job Base Camps (ECD Base Camps). After recommending that Grundy County shift from LWDA 6 to LWDA 5 to better serve its citizens, it was apparent that we needed to conduct a comprehensive alignment analysis of all our LWDAs.

During the time period from February 2018 to the SWDB quarterly meeting on May 11, 2018, the SWDB staff completed an extensive analysis of the state's workforce development areas, federal and state resources, and labor market data. Furthermore, the SWDB reviewed Tennessee's capacity to serve our citizens in the areas of workforce development, economic development, and access to higher education and training services. As part of this analysis, leadership from Tennessee's Department of Labor and Workforce Development sought input from local county mayors, local workforce development board chairs, and community leaders across the state. The meetings focused on aligning LWDAs with the ECD Base Camps and also demonstrated how the shift would coincide with the adult education and career pathways regions. The parties were also informed of the analysis and considerations being made by the SWDB and Workforce Services staff in terms of labor market analysis and workforce trends. The major takeaway from each of these meetings was that Tennessee needs to further enhance its regional development capacities and optimize opportunities to share and leverage resources in the areas of

Figure 5B - Letter–TN Realignment of LWDAs– p1 of 2

workforce development partnerships while continuing to create access to services and opportunities in rural areas.

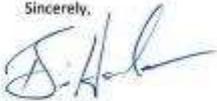
Upon completion of this analysis, at its May 11 SWDB meeting, the board elected to recommend realignment of the current thirteen LWDAs with the nine ECD Base Camps supporting my vision of streamlining and aligning regional service delivery. Upon careful consideration and deliberation with our state agencies, partners, and local leaders, I have moved to adopt the recommendation of the SWDB to realign the current thirteen LWDAs to align with the nine ECD Base Camps effective July 1, 2018. We must align our resources to allow for a more efficient and effective government and bring forth innovation and best practices that will help Tennessee lead the nation in jobs, education, and government efficiency.

I am confident that through this realignment of the LWDAs, our local leaders and partners will be better able to work together in the areas of workforce, education, and economic development. The realignment will also continue to increase access to higher education and training opportunities, while enhancing services for citizens in rural areas. The realignment enables our agencies to deliver services and manage public resources in a sound, fiscally conservative manner. The principles of working together, exploring innovation, living within our fiscal means—while providing opportunities to our citizens—have led to Tennessee's recent successes. As we move into the future—and face a rapidly changing world in technology, workforce, and business—these principles will be vital to Tennessee's future successes. Tennessee can and will lead in the area of workforce development.

In the event of any dissent with this realignment, you may file an appeal pursuant to the Workforce Innovation and Opportunity Act [29 U.S.C. § 3121]. Such appeal must be in writing and directed to Todd Skelton, Deputy Counsel to the Governor, via email at [Todd.Skelton@tn.gov](mailto:Todd.Skelton@tn.gov) within 14 calendar days of the date of this letter.

Thank you for your continued commitment to promoting the economic and workforce development of communities across the state.

Sincerely,



Bill Haslam  
Governor

Figure 5C - Letter—TN Realignment of LWDAs— p2 of 2

### C. Provide the appeals process referred to in section 106(b)(5) of WIOA relating to designation of local areas

State Policy information regarding this full process can be found in DESIGNATION OF LOCAL WORKFORCE DEVELOPMENT AREA TN-WIOA (15-1). The content of this policy is as follows:

The Workforce Innovation and Opportunity Act (WIOA) require the Governor, in partnership with the State Board and in consultation with the Chief Elected Officials (CEOs), to develop a policy for initial designation of the Local Workforce Development Areas. WIOA requires that existing federally recognized workforce areas are designated during the first two program years; this designation is referred to as Initial Designation. The WIOA states that a unit of general local government (including a combination of such units) or a grant recipient that requests but are not granted designation of an area as a local area, may submit an appeal to the State board under the appeal process established

in this policy. The public comment period must offer adequate time for public comment prior to designation of the local workforce development area and it must provide an opportunity for representatives of interested business, education, and labor organizations to have input into the development of the formation of the local area.

#### Appeals Process

For purposes of appeal, a unit of general local government (including a combination of such units) or grant recipient that requests but are not granted designation as a local area may submit an appeal to the SWDB under an appeal process established below. If the appeal does not result in such a designation, the Secretary of Labor, after receiving a request for review from the unit or grant recipient and on determining that the unit or grant recipient was not accorded procedural rights under the appeals process described in the State procedure, may require that the area be designated as a local area.

#### Procedures for Appeals to the State:

323. An appeal must be in writing and filed with the TDLWD within fourteen (14) days after notification of the decision. The appeal is to be submitted to the Commissioner of the TDLWD.

324. The appeal must contain a specific statement of the grounds upon which the appeal is sought.

325. The SWDB will have sixty (60) days to review the appeal and make a recommendation to the Governor. The review will take into account the information in the original request and supplemental information provided in the appeal to determine if the criteria set forth in this policy have been met.

326. The final decision rests with the Governor.

327. If the appeal is connected to a request for initial designation under this policy, and if the appeal does not result in designation, the entity may request review by the Secretary of Labor to determine if procedural rights were granted or if the minimum criteria of WIOA Section 106(b)(2) or Section 106(b) (3) was met. This second level of appeal must be sent within 14 days to:

Assistant Secretary of Employment and Training

U.S. Department of Labor

200 Constitution Avenue, N. W.

Washington, DC 20210

A copy of the appeal must be simultaneously provided to

ETA Regional Administrator

U.S. Department of Labor, Employment and Training Administration

61 Forsyth Street, SW, Room 6M12

Atlanta, GA 30303

**D. Provide the appeals process referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding**

One-Stop partner may appeal the Governor's determination regarding their portion of funds to be provided for infrastructure costs. The appeals process is described in the Unified State Plan and is consistent with the current Grievance and Complaint Policy TN (16-6). This policy applies to all entities and individuals who would like to appeal a decision at the local or the state levels.

The appeals process relating to determinations for infrastructure funding are as follows:

A. The Governor, through the assistance of the SWDB, will make the final determination of each required partner's proportionate share of statewide infrastructure costs under the State funding mechanism.

B. Any required partner may appeal the Governor's determination on the basis of a claim that:

328. The Governor's determination is inconsistent with the proportionate share requirements of 20 CFR 678.735(a), or

329. The Governor's determination is inconsistent with the cost contribution caps described in 20 CFR 678.736 and 20 CFR 678.738.

C. The process will ensure resolution of the appeal in order to ensure the funds are distributed in a timely manner, consistent with the requirements of 20 CFR 683.630.

D. An appeal must be made within twenty-one (21) days of the Governor's determination and must be submitted formally, in writing, by registered mail no later than the twenty-first (21st) day from the date of receipt of the notice of denial or revocation.

## 2. Statewide Activities

### A. Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities

Through the oversight of the State of Tennessee's State Workforce Development Board (SWDB), State policies are implemented to provide guidance on the make-up of the workforce system under WIOA. The SWDB votes on and approves policies on a quarterly basis that help guide the structure of the workforce system to include how each Local Workforce Development Board (LWDB) governs and how they are to utilize allocated workforce system funding. Currently the State has implemented 90+ policies, guidances, memorandums, and manuals. These policies are updated quarterly, if necessary, with new or amended policies as determined by the SWDB and uploaded on the State website for the public and LWDBs to review. *The policy that specifically address the use of State funds for workforce investment activities is labeled Requesting Additional WIOA Funds. These policies can be located at <https://www.tn.gov/workforce/general-resources/program-management/program-management-redirect/workforce-services-redirect/wioa-technical-assistance.html>.*

B. Describe how the State intends to use Governor's set aside funding. Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any

## layoff aversion strategies they have implemented to address at risk companies and workers

The TN Rapid Response Program is designed to quickly and effectively respond to layoffs and closures. The State has one State Rapid Response Coordinator who processes WARNs and oversees the program.

The State has decentralized the role of response to the layoff/closure to our Local Workforce Development Boards (LWDB). The State makes available Rapid Response funds to the local areas to provide Rapid Response services to closures and layoffs in their Local Workforce Development Areas (LWDA).

Each of the 9 LWDBs has designated a Local Rapid Response Coordinator who is responsible for responding to WARNs and any other closures or layoffs in the area. The Local Rapid Response Coordinators lead a core group of partners on the Rapid Response team. The team consists of, but is not limited to, the Coordinator, Unemployment Insurance, the One-Stop Operator, the Career Service Provider, the State Wagner-Peyser staff, and other partner staff as needed.

This team works with the company to conduct the mass meeting of the affected employees on one site when at all possible. The Coordinator, with assistance from other partners, presents information about benefits and programs the workers will be entitled to as Dislocated Workers.

This decentralized structure allows for local control to meet local needs. This also allows for quicker response times due to the coordinators being locally stationed and not centrally located in the State capitol. Additionally, this structure allows for a stronger connection between the local business and the LWDB in hopes of avoiding a layoff in the future.

### **Rapid Response**

*The Tennessee Rapid Response Program is designed to quickly and effectively respond to layoffs and closures. The State has one full-time state Rapid Response Coordinator who processes Worker Adjustment and Retraining Notifications (WARN) and oversees the program.*

*The role of Rapid Response for layoff/closure has been decentralized to our Local Workforce Development Boards (LWDB). Tennessee has established nine designated local workforce areas across the state. Each area has a full-time local Rapid Response Coordinator who is responsible for responding to WARNs and any other company closure or layoff located in their area. The Coordinators lead a core group of partners on the Rapid Response team that consists of but is not limited to Unemployment Insurance, the One-Stop Operator, the Career Service Provider, state Wagner-Peyser staff, other partner staff as needed, and the six Mobile American Job Center units.*

*Rapid Response funds are made available from the state to the local areas to provide Rapid Response services for company closures and layoffs in the Local Workforce Development Areas (LWDA). These funds are also be used to assist with the technological expenses such as Jobs4TN, the mobile AJC units, materials, and staff time associated with Rapid Response activities.*

*The specific technology features of Jobs4TN can be found with the creation of an online WARN to help employers easily access Rapid Response services when a layoff or closure occurs.*

*Upon receipt of an official WARN, the State Dislocated Workers Unit (DWU) will create a WARN notice in Jobs4TN. If an official WARN notice is not received but layoff information is obtained, local LWDA representatives will work with the company to provide services to the affected employees. Once this WARN has been created, the DWU Rapid Response staff will notify the appropriate rapid*

response coordinator. Activities and strategies are initiated to address dislocation events that ensure rapid response access to the broad range of allowable assistance in conjunction with:

- appropriate federal, state, and local service agencies and officials;
- employer associations;
- technical or other business councils; and
- labor organizations.

The DWU serves as the central WARN contact. E-mail WARN notices are sent to local Rapid Response coordinators and appropriate partners within 24 -48 hours of receipt. The DWU works with the LWDA's to coordinate outreach efforts ensuring a comprehensive level of service to assist the participants. When Notification of WARN Information from the DWU is received, the Local Rapid Response Coordinator makes immediate contact (within 48 hours) with the employer to offer rapid response services to the company and employees. This initial contact should result in the scheduling of a planning meeting and begin the information gathering process for the Rapid Response Company Information Report. The initial planning meeting will provide the company with an overview of what information will be delivered during an employee mass meeting, scheduling for the mass meeting, and completion of the information gathering.

The mobile units, also known as Mobile American Job Centers have computers with internet, Microsoft Office Access, and copy and fax capabilities for use by job seekers. These units, allow full service, on-site facilitation of Rapid Response services. The mobile teams will coordinate activities geared to connecting employees affected by the layoffs/closings to other employment opportunities to minimize the time needed for unemployment insurance assistance.

In addition to connecting dislocated workers to employment, Rapid Response teams will work to provide participants with training opportunities through WIOA and partner programs including the higher education system. Rapid Response teams will also work with the AJCs to connect participants to apprenticeships, on-the-job trainings, and other dislocated worker re-employment activities as their needs dictate.

### **Layoff Aversion**

As part of the State's lay-off aversion strategy, the Business Services Teams within the LWDA's are conducting direct outreach to businesses to determine the needs of current staff and provide solutions, to include training opportunities and apprenticeship programs that can increase their efficiencies and help them avoid a possible layoff.

This direct approach has proven successful in building relationships with employers and provided opportunities for them to increase the skills level of their workers and therefore preventing a temporary, or permanent, shutdown.

The State-level Director of Business Services works with multiple partner agencies, including Adult Education and Vocational Rehabilitation in the LWDA's, both locally and regionally, to deliver coordinated and effective services to employers. Adult Education provides help to those workers who have been identified as educationally deficient through remedial instruction and testing. Vocational Rehabilitation assists those who employees who have disabilities that may hinder their efficiencies on the job as well as provide a pool of well-qualified individuals who can fill job openings as needed. As partners, we meet quarterly to organize strategies, focus on building relationships and delivering a comprehensive solution with businesses, trade associations, community, civic, and non-profits organizations to better understand the needs of employers and provide awareness of the available services and resources.

*In situations where a layoff or closure cannot be averted, basic career services are delivered to dislocated workers enabling them to transition quickly into new employment. Eligible dislocated workers may also receive training and/or education through the WIOA Title I Adult and Dislocated Worker programs or the Trade Adjustment Assistance (TAA) program.*

### C. In addition, describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities

#### Services Following a Disaster

If the Federal Emergency Management Agency (FEMA) organizes services for disaster victims, the Department FEMA contact will assess the need for a NEG within 24 hours. The State will contact FEMA to secure a list of job orders required to assist disaster victims and to begin the cleanup afterward.

FEMA will set up Disaster Centers. These centers will include a career center, unemployment insurance, and WIOA job training programs. Other agencies and programs typically represented are American Red Cross, Internal Revenue Service, Tennessee Attorney General, Tennessee State Emergency Management Agency, local law enforcement, Salvation Army, Small Business Administration, Social and Rehabilitation Services and other appropriate local service organizations.

If FEMA is not involved in a local disaster, the DWU and LWDA will contact the following to organize services for disaster victims: chamber of commerce, city clerk and/or administrator, city mayor, Red Cross, Salvation Army and employers affected by the disaster. Once these contacts are made, the information regarding the services available to assist those who lost their jobs due to the disaster should be provided. A temporary office in the area may be set up to provide these services. Workers who have lost their jobs due to the disaster may be offered the following additional services:

- o Classroom training
- o Daycare
- o Jobs at work sites, including wages and benefits
- o Mileage
- o On-the-job training
- o Out-of-area job search and relocation
- o Outreach and communications
- o Tools needed for the job
- o Work-related physical exams and medical exams

TDLWD has 6 mobile American Job Centers stationed across the state. In the event of a disaster, TDLWD will coordinate with TEMA, FEMA, and the LWDA's to mobilize the units to set up information and command centers in local communities in order to provide DWU and Rapid Response services.

### D. Describe how the State provides early intervention (e.g., Rapid Response) to worker groups on whose behalf a Trade Adjustment

Assistance (TAA) petition has been filed. (Section 134(a)(2)(A).) This description must include how the State disseminates benefit information to provide trade-affected workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the trade-affected dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition.

Local Rapid Response Coordinators ensure those touched by Trade receive assistance as early as possible. RR coordinators receive notification of mass layoffs, closures, and TAA petition filings/certifications within 24 hours of official notification receipt. (WIOA Sect 134 (a))

Mass meetings in response to layoffs or closures with the potential to be Trade impacted receive information related to Trade Adjustment Assistance services. Trade-impacted workers will be provided with information on Trade petition application procedures, who may file, how to file, when to file, and what services and benefits will be available if the petition is deemed Trade impacted.

At the time the petition is certified, the State will try to provide notice to those covered by the petition through the mail, email, social media, and newspapers of general circulation in the area in which the workers reside. The notices will describe the benefits that are available for the workers to request.

Rapid Response funds will be used to carry out the statewide Rapid Response activities including in conjunction with TAA funds. When a company is Trade impacted or potentially Trade impacted, a representative will attend the mass meeting to supply the above information, using TAA funding. This will allow for the braiding of TAA funds and Rapid Response funds to serve potential TAA-impacted workers.

## b. Adult and Dislocated Workers Program Requirements

### 1. Work-Based Training Models

If the State is utilizing work-based training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

*As part of the Governor's priority on work-based learning (WBL), the Tennessee Department of Labor & Workforce Development will continue using the current work-based training (WBT) strategy consisting of on-the-job training (OJT), incumbent worker training (IWT), apprenticeships, Individual Training Accounts (ITA), and other WBL opportunities as the base method of delivering services centered on the needs of both the participant and the employer. This strategy emphasizes a process that involves a hands-on work component that provides not only the necessary educational component required but also results in job performance outcomes[1].*

*The utilization of these WBL methods will be used for all WIOA Title I Programs, whenever possible, to provide the most effective environment and outcome for the student. Additionally, the Trade*

*Adjustment Act that in the past has not utilized WBL programs, will now leverage the use of this type of instruction for trade-impacted participants.*

*Work-based learning programs complement all apprenticeship models, including pre-apprenticeships, youth apprenticeships, and Industry Recognized Apprenticeship Programs (IRAPs). The TDLWD's Apprenticeship Director is working collaboratively with the Tennessee Department of Education, High School Career and Technical Education (CTE) Departments, and the Office of Adult Education to identify employers that need to increase their talent pipeline and wish to build a WBL program. This approach will especially benefit all in-school youth participants including those enrolled in a Youth Apprenticeship program for high school CTE students age 16 and 17.*

*Out-of-school youth participants also benefit from this comprehensive strategy for work-based learning. The TDWLD, with guidance from the agency's Youth Program Manager, has created a new framework for forge stronger partnerships with area nonprofits, the state's Extension of Foster Care program, along with other stakeholders to develop services that allow out-of-school youth to have access to meaningful work-based learning activities. Given the barriers that impact successful employment outcomes for this population, work-based learning solutions offer the most efficient means for self-sustainability and long-term employment success.*

[1] <https://www2.ed.gov/about/offices/list/osers/transition/products/fpt-fact-sheet--work-based-experiences--11-5-15.pdf>

## 2. Registered Apprenticeship

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., job center staff taking applications and conducting assessments).

The key to growing Registered Apprenticeship programs in Tennessee is knowledge and communication. Under the Apprenticeship State Expansion grant, the Office of Apprenticeships will be launching a training program for all state functions that engage with employers and individual job seekers including but not limited to Regional and Executive Directors, American Job Center employees, Business Services personnel, Tennessee College System Workforce Development employees, and Economic and Community Development Regional employees. This training will provide an overview of Apprenticeships and what is required for a program to become registered as well as intensive training related to how to engage and communicate with employers regarding Apprenticeships. In addition, the Office of Apprenticeships will actively collaborate and keep an open dialog with partnering state agencies to ensure that information related to current apprenticeships, new programs and availability of training stays fluid.

Along with increasing staff members' knowledge of Apprenticeship programs and their benefits to employers, marketing materials with Office of Apprenticeship contact information are being developed for reference and will be provided to employers as handouts. These materials will be readily available for all staff members in all locations.

A new ApprenticeshipTN website is launching in 2020. This website will also be a tool for staff members to locate active apprenticeship programs in TN as they work with individuals seeking employment in apprenticeship programs. Through our collaborative partnerships the ApprenticeshipTN website and other state agency websites will be linked to present a unified effort on Apprenticeships.

Regional Apprenticeship Directors will be hired in 2020, creating main Apprenticeship resources in each of the three grand regions. The Apprenticeship Directors will be charged with serving both

employers and staff in training and providing assistance on registering new programs and growing existing programs.

The Office of Apprenticeships will also partner with the Tennessee College System to host a Workforce Development Conference for both individuals and businesses. The conference will provide breakout sessions for in-depth discussions related to apprenticeship programs and training related to managing apprenticeships. In addition to the conference, The Office of Apprenticeships will have a key role in facilitating and training the Tennessee College System TN Trained Cohort which will have a substantial focus on Apprenticeships.

### 3. Training Provider Eligibility Procedure

Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

#### ***Initial Eligibility***

*Training providers who wish to be placed on the statewide Eligible Training Provider List (ETPL) must be initiated by completing an online New Provider Application. The Initial eligibility procedures apply to all training providers except for registered apprenticeships. After the training providers have completed their application, the local workforce development area (LWDA) that is closest to the primary location will verify the information to determine the provider's eligibility to be placed on the list of approved providers. Initial eligibility is based on the following:*

- *Meeting state minimum performance criteria, as approved by the State Board.*
- *Training must be for occupations in industry sectors that are in demand.*
- *Training must result in the completion of an industry-recognized credential, national or state certificate, or degree, including all appropriate industry competencies, licensing, and certification requirements.*
- *Providers must provide evidence of accreditation and licensure with the appropriate state or other governing entity to have their programs listed on the ETPL.*

*Upon approval, the provider then enters all the programs offered to be reviewed and approved by the Local Workforce Development Board (LWDB). Additionally, Eligible Training Providers (ETPs) must provide the following for initial eligibility:*

- *Description of each program of training services to be offered;*
- *Evidence that programs result in the awarding of an industry-recognized credential, national or state certificate, or degree, including all appropriate industry competencies, licensing, and certification requirements;*
- *Cost information, including tuition and fees;*
- *Information that addresses alignment of the training services with in-demand industry sectors and occupations, to the extent possible;*
- *Information related to the indicators of performance, which include for all students Workforce Innovation & Opportunity Act (WIOA) performance indicators (employment 2nd & 4th Quarter after exit, median earnings 2nd Quarter after exit, and credential attainment)*

After the LWDB votes on the ETP's application, written notification must be submitted to the State within thirty (30) days of the decision to add or deny the training provider placement on the ETPL. This applies to in-state and out-of-state training providers with training programs.

- Local workforce boards may require supplemental information and may set additional eligibility criteria in their local policy.
- New training provider program applications may be submitted on any day of the year.

#### **Continued Eligibility:**

Approved training providers receive initial eligibility for one fiscal year for a particular program. After the initial eligibility expires, training providers are subject to application procedures for continued program eligibility every two years. Also, the US. Department of Labor requires the Tennessee Department of Labor and Workforce Development (TDLWD) to report on the performance of providers annually, including Tennessee's ETPL. Thus, the information submitted by the providers to TDLWD will be used as criteria for assessing a program's requirement for continued ETPL eligibility.

The state minimum performance standard measures are a follow:

- WIOA student completion rate for each program must be  $\geq 40\%$ .
- All students completion rate for each program must  $\geq 40\%$
- WIOA student placement rate for each program must be  $\geq 70\%$ .
- All students placement rate for each program must be  $\geq 70\%$ .

As subsequent eligibility determinations are made on an annual basis, any program that fails to meet the minimum performance standards, as established by the State, will be removed from the ETPL for a minimum period of one (1) program year.

Any time after the initial program approval by the LWDB, the ETP - including registered apprenticeship programs - can request to have a program removed from the ETPL.

- Training providers must be made aware that specific programs may be approved for some local areas and denied for others.

#### **Appeal Process:**

If a local workforce development board denies an ETP's initial application for listing on the ETPL, the LWDB must, within thirty (30) days from the date of determination, inform the ETP in writing, including the specific reason(s) for the denial and complete information on the appeal process as established on the ETPL Policy.

A training provider wishing to appeal a decision by the LWDB must submit an appeal to the LWDB within thirty (30) days of the issuance of the denial notice. Similarly, a training provider may appeal to the State after they have exhausted the appeal process of an LWDB and are dissatisfied with the LWDB's final decision.

A program failing to appeal pursuant to the LWDB process, or failing to appeal within the specified 30-day period, is ineligible for WIOA funding. Equally, a training program whose appeal is denied will be ineligible for WIOA funding and will no longer be considered as a WIOA approved program.

#### **Registered Apprenticeship:**

*Registered Apprenticeship programs (RAP) are not subject to the same application and performance information requirements or a period of initial or continued ETPL eligibility as other training providers. While registered apprenticeship programs are automatically eligible for inclusion on the State ETPL, not all registered apprenticeship sponsors may know how to be included on the list. Therefore, the TDLWD has notified all existing and new RAP sponsors of their eligibility to be on the ETPL. The department is committed to adding all RAPs that indicate interest to the State's ETPL. Minimal information such as occupation(s), name and address of the registered apprenticeship program sponsor, method and length of instruction, and number of active apprentices is required for registered apprenticeship programs to be placed on the statewide ETPL. Registered apprenticeship programs on the ETPL are available to every Local Workforce Development Area (LWDA) in the state. They will remain on the list as long as the program is registered or until the program sponsor notifies the TDLWD that it no longer wants to be included on Tennessee's ETPL ( TEGL 8-19 ).*

The policy has been revised and has gone for public comments. It is now in compliance with TEGL 08-19 and will be presented to the board on June 5, 2020 for approval.

#### **4. Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program**

The monitoring of priority of services is carried out through our on-site monitoring visits of programs and governance. The monitoring of these and other required services are guided by the State's monitoring review guide updated annually to describe the methods of how monitoring activities will be conducted. A Priority of Service guidance has been provided to Local Workforce Development Boards (LWDBs) to instruct how to carry out the priority of service of the adult and veteran populations. The guidance also instructs the LWDBs to create a policy on how this will be carried out within their respective area. *The guidance can be located at <https://www.tn.gov/content/dam/tn/workforce/documents/ProgramManagement/WFS%20WIOA%20Adult%20Priority%20of%20service%20guidance-2.pdf>*

Flags for the priority populations required under WIOA already exist in TN's Virtual One Stop (VOS) case management system, and our staff user guides emphasize edit-checked methods of intake, determinations of eligibility, and we prepared for transition through system generated extract files which listed the frequencies of priority enrollments by region and local areas. Then using WIOA eligibility business rules, we migrated enrollments eligible for priority of service into VOS. Our system user guides and digital training guides prepared local and partner staff in the points of priority of service. Our system reports available to all, and prepared in accordance with WIOA statutory requirements, have been put in place.

Adult Education will coordinate with the adult and dislocated worker programs in order to provide assessment, adult education and literacy activities, and training opportunities where possible. When determining if individuals are eligible for the training services under WIOA §134, adult education will rely on the determination of the adult and dislocated worker program. If individuals are determined to be eligible under those programs, adult education can be assistive in the provision of services.

If adult and dislocated participants need to be assessed to determine education, Adult Education can be assistive in proctoring TABE or CASAS assessments. When a participant is determined to be in need of basic skills education/remediation, Adult Education can enroll the participant in classes to provide instruction for basic skills improvement. In the event that the participant(s) are in an area where a local provider has established training opportunities, the participant (s) could qualify for training services under integrated education and training.

## 5. Describe the State’s criteria regarding local area transfer of funds between the adult and dislocated worker programs

WIOA sec. 133(b)(4) provides the authority for local workforce areas, with approval of the Governor, to transfer up to 100 percent of the Adult Activities funds for expenditure on Dislocated Worker Activities , and up to 100 percent of Dislocated Worker Activities funds for expenditure on Adult Activities. States and local workforce areas do not have the authority to transfer funds to or from the Youth Activities program. For further details on TDLWD’s criteria on the above referenced transfer authority, please refer to Workforce Services Policy – Transfer Authority.

[https://www.tn.gov/content/dam/tn/workforce/documents/ProgramManagement/Completed\\_WFS\\_Policy\\_-\\_Transfer\\_Authority\\_-\\_WIOA.PDF](https://www.tn.gov/content/dam/tn/workforce/documents/ProgramManagement/Completed_WFS_Policy_-_Transfer_Authority_-_WIOA.PDF)

### c. With respect to youth workforce investment activities authorized in section 129 of WIOA—

With respect to youth workforce investment activities authorized in section 129 of WIOA—

1. Identify the State-developed criteria to be used by local boards in awarding grants or contracts for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants or contracts.[11]

[11] Sec. 102(b)(2)(D)(i)(V)

The local boards will adhere to the procurement policy issued by TN Department of Labor & Workforce Development – Workforce Services Division that outlines competitive procurement through a request for proposal (RFP) process for one-stop operators, career service providers, and youth providers.

The local workforce development board (LWDB) must identify eligible youth providers for the local workforce development area (LWDA) by awarding grants or contracts on a competitive basis based

on the recommendation of the youth standing committee. Youth standing committee members must disclose any and all conflicts of interest with bidder's staff, including, but not limited to, family ties (spouse, child, parent, sibling) fiduciary roles, employment or ownership interests in common.

When awarding grants or contracts to youth service providers, the local boards must follow, at minimum, the following criteria:

1. Proposals must include a detailed outline of how the bidder will execute youth elements identified in the RFP;
2. Proposals must demonstrate the bidder's ability to deliver services to the targeted population in accordance with locally established guidelines;
3. Proposals must demonstrate whether the organization leverages community-based resources, including partnerships with organizations that provide leadership development, mentoring services and private sector employment involvement
4. Proposals must highlight the bidder's experience in engaging at risk youth in similar activities; and
5. Proposals must illustrate the understanding of and commitment to meeting goals and objectives established by local board.

WIOA requires an inclusive comprehensive service delivery through executed MOUS and agreements. TDLWD, through partner engagement meetings, have created a team of agencies to review local and regional plans for alignment and gap identification- TDLWD will include core partners in the evaluation and monitoring of career services provider to ensure ALL Tennesseans (WIOA eligible or not) are receiving adequate high-quality linkage to the workforce system, and supportive services to achieve completion.

**2. Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available.**

*As it specifically pertains to out-of-school youth, individual service plans will identify the participants' needs and interests and seek to coordinate the optimum blend of services and funding to achieve the participant's goals for success. This success plan can include, but is not limited to, the indication of a work experience opportunity, career pathway program of study, and any of the other 14 program elements. This model is an integrated structure of programs and services intended to:*

- *develop basic, technical and employability skills;*
- *provide continuous education and training; and*
- *offer work supports that lead to high-demand job opportunities in targeted sectors*

*The State will continue to collaborate with partner agencies and organizations in order to develop a program design that fosters alignment of services and streamlines services for all youth entering the workforce and seeking to continue their education.*

*Also, the State intends to expand funding opportunities to nonprofits and other entities that (1) are currently serving at-risk youth and (2) have established programs and services that align with the one or more of the 14 youth program elements. The State will also produce a comprehensive youth program framework in which the local boards and entities will use to construct the design and delivery from a local perspective. The combined efforts for the aforementioned items will contribute to the improved outcomes for the growing number of out-of-school youth participants.*

*Tennessee will utilize multiple strategies for improving the outcome for the out-of-school youth population. This includes creating a common WIOA intake process that will collect demographic participant information for the four core programs and additional partners. The State will review opportunities for implementing a common referral system that allows all partners and additional organizations the ability to refer participants into the WIOA system. Being able to utilize one referral portal will increase access to programs and foster co-enrollment amongst programs.*

*The State has implemented an key performance indicators (KPI) initiative with all core programs and required partners to increase services to Tennesseans with significant barriers to employment across all programs. These are State metrics that will not replace federal performance measures. Having specific measures for each program to obtain will generate alignment between programs because of the assigned metrics.*

*The State will continue to hold quarterly partner meetings to ensure all partners, core and required, are aware of program operations and fostering alignment across program enrollment and service delivery.*

*Tennessee's longitudinal data system tracks data across all core programs, as well as additional information related to education, child services, and human services. This system facilitates collaboration across the core programs and partner organizations, which has resulted in improved planning and strategy development. The reports produced from the longitudinal system assist with federal and state reporting. Currently, multiple state agencies and higher education systems are engaged in a study to better understand the social and economic outcomes of Tennesseans that would qualify as WIOA Youth.*

*The State Workforce Board has established a key priority for collaborative engagement and cross-training of service provider staff. The goal of this effort is the simplify the intake process for participants, regardless of the serve entry point, which in turn provides an efficient delivery of comprehensive services for citizens with multiple barriers to employment.*

*To compliment our strategies and initiatives for out-of-school youth, as well as proactively mitigate the risk of a growing youth population, the state has placed an emphasis on serving in-school youth. Studies have demonstrated the long-term impacts – positive – on youth and young adults when they are engaged in meaningful work experiences or related activities. Additionally, Tennessee has made aggressive steps toward improving access to postsecondary opportunities, as well work-based learning activities. In an effort to expand the partnership strategy to core program partners and other stakeholders, the state has launched several new pilot programs for in-school and out-of-school youth that (1) clarify career pathways in their respective regions, (2) engage multiple agencies to merge resources to increase program success, and (3) foster local collaboration with relevant stakeholders. The Tennessee partners have also set a goal to establish specialized American Job Centers located in high schools to provide services to youth as well as their families.*

*Tennessee Department of Education (TDOE) (Carl D. Perkins Vocational and Technical Education) and Tennessee Department of Labor and Workforce Development share a common vision that all students should have the opportunity to high quality, and rigorous programs of study aligned to industry and employer needs. Currently career and technical education in Tennessee is comprised of sixteen (16) Career Clusters or industry sectors:*

- *Advanced Manufacturing*
- *Agriculture, Food, and Natural Resources*
- *Architecture and Construction*
- *Arts, Audio/Visual Technology, and Communications*
- *Business Management and Administration*
- *Education and Training 86*
- *Finance*
- *Government and Public Administration*
- *Health Science*
- *Hospitality and Tourism*
- *Human Services*
- *Information Technology*
- *Law, Public Safety, Corrections, and Security*
- *Marketing, Distribution, and Logistics*
- *STEM (science, technology, engineering, and mathematics)*
- *Transportation.*

*These programs of study are designed to lay a strong foundation that prepares the student to enter the aligned career field or progress into a postsecondary program for advanced training. At the postsecondary level, these programs are designed to provide advanced training and offer the credentials an individual need to prosper under the economic and workforce demands of Tennessee. The “Best for All” rally cry for Tennessee is inclusive of our adult learners known as out-of- school youth (OSY) through Governor Lee’s charge for all Tennessee state agencies to successfully develop and implement a comprehensive workforce strategy collectively that will benefit Tennessee employers, individuals seeking career opportunities; and future employers looking to expand or locate in the Volunteer state.*

*Finally, in order to execute a comprehensive and cohesive workforce development strategy across programs, the Tennessee Workforce Development System (TNWDS) Steering Team has been formed. The team consists of members from TBR, THEC, TNECD, TDOC, DHS, & DOE and is led by TLWD. The team is charged with: 1) Aligning Strategy, 2) Implementing Initiatives and 3) Monitoring Progress for Tennessee’s workforce development system. The team will receive support and guidance from a broad-based Advisory Committee.*

*The strategic goals will allow the TN Workforce System to not only share common outcomes, but accountability in successfully moving Tennessee youth to high quality careers and self-sufficiency.*

3. Describe how the state will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented, including quality pre-apprenticeship programs under the work experience program element. [12]

[12] Sec. 102(b)(2)(D)(i)(I)

The State will conduct annual monitoring as outlined in State's most current monitoring guide. The State will explore establishing a monitoring taskforce, composed of representatives from partnering TN State Agencies, to assist with remote and onsite monitoring specifically for the Title I youth program. Utilizing the WIOA Youth Supplement Core Monitoring Guide and other tools deemed applicable, staff will evaluate the local areas implementation of the program to include processes that inform and make available all 14 program elements.

TDLWD understands that WIOA cannot be the only solution in ensuring seamless industry alignment and opportunities for all Tennesseans. TDLWD will explore opportunities to deepen our partnership and service delivery through other agencies such as; Mental Health and Substance Abuse, Department of Children Services, and Department of Education by executing interagency agreements and memorandum of understandings to leverage/support existing programs for specific underserved populations.

TDLWD will explore diverse service delivery models, especially for our Youth population by replicating proven models through partner programs such as the Intermediary Model being used within Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T).

4. Provide the language contained in the State policy for "requiring additional assistance to enter or complete an educational program, or to secure and hold employment" criterion for out-of-school youth specified in WIOA section 129(a)(1)(B)(iii)(VIII) and for "requiring additional assistance to complete an education program, or to secure and hold employment" criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII). If the state does not have a policy, describe how the state will ensure that local areas will have a policy for these criteria.

Through observation and input from local areas, the State will not be defining in the State Plan or policy the definition of "requiring additional assistance to enter or complete an educational program, or to secure and hold employment" criterion. Instead, it will be outlined in State policy for local areas to ensure there is a definition for this criterion in local youth policy. Local areas must also outline required documentation for this criterion. This will help the local areas address specific employment and educational barriers that are unique to the youth of the local area.

Local areas must provide evidence supporting the “requires additional assistance” barrier prior to the approval of any local policy. The state will issue guidance, submission instructions and additional resources to assist local areas in identifying and determining community and regional needs. The State will also support local areas in creating meaningful partnerships with non-traditional/mandated partners to assist in identifying the population identified and the tools/resources needed to remove barriers.

**5. Include the State definition, as defined in law, for not attending school and attending school as specified in WIOA Section 129(a)(1)(B)(i) and Section 129(a)(1)(C)(i). If State law does not define “not attending school” or “attending school,” indicate that is the case and provide the state policy for determining whether a youth is attending or not attending school.**

TN Code Annotated defines types of schools (TCA 49-6-3001, 49-6-401, 49-7-2003) and State policy defines “attending school” and “not attending school.” Outlined in policy, the State has defined “attending school” as: An individual is considered to be attending school if the individual is enrolled in a secondary school or registered for credit-bearing courses at a post-secondary institution. Such schools and/or institutions include, but are not limited to: Tennessee Colleges of Applied Technology, community colleges, four (4) year college/university, traditional K-12 public and private, and alternative schools (e.g. continuation, magnet, charter, and home schools). State policy defines “not attending school” as: An individual who is not attending a secondary or post-secondary institution.

**6. If using the basic skills deficient definition contained in WIOA Section 3(5)(B), include the State definition which must further define how to determine if an individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society. If not using the portion of the definition contained in WIOA Section 3(5)(B), indicate that is the case.**

The State defines basic skills deficiency in policy as an individual that has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test or is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual’s family, or in society, is considered basic skills deficient. To determine if this is the case, the individual must be given the most recent versions of a TABE, CASAS or other formalized testing instruments designed to measure skills-related gains. Local boards must ensure that any formalized testing used is valid, reliable, appropriate, fair, cost effective, well-matched to the test administrator’s qualifications, and easy to administer and interpret results.

## **d. Single-area State Requirements**

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must include—

1. Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)
2. The entity responsible for the disbursement of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15).)
3. A description of the type and availability of WIOA title I Youth activities and successful models, including for youth with disabilities. (WIOA section 108(b)(9).)

N/A

4. A description of the roles and resource contributions of the one-stop partners.

N/A

5. The competitive process used to award the subgrants and contracts for title I activities.

N/A

6. How training services outlined in section 134 will be provided through individual training accounts and/or through contracts, and how such training approaches will be coordinated. Describe how the State will meet informed customer choice requirements regardless of training approach.

N/A

7. How the State Board, in fulfilling Local Board functions, will coordinate title I activities with those activities under title II. Describe how the State Board will carry out the review of local applications submitted under title II consistent with WIOA secs. 107(d)(11)(A) and (B)(i) and WIOA sec. 232.

N/A

8. Copies of executed cooperative agreements which define how all local service providers will carry out the requirements for integration of and access to the entire set of services available in the one-stop delivery system, including cooperative agreements with entities administering Rehabilitation Act programs and services.

N/A

### e. Waiver Requests (optional)

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

1. Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;
2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;
3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;
4. Describes how the waiver will align with the Department's policy priorities, such as:
  - A. Supporting employer engagement;
  - B. Connecting education and training strategies;
  - C. Supporting work-based learning;
  - D. Improving job and career results, and
  - E. Other guidance issued by the department.

5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and

6. Describes the processes used to:

A. Monitor the progress in implementing the waiver;

B. Provide notice to any local board affected by the waiver;

C. Provide any local board affected by the waiver an opportunity to comment on the request;

D. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.

E. Collect and report information about waiver outcomes in the State's WIOA Annual Report.

7. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

**Please see following two (2) State of Tennessee Waiver Requests:**

**1) Out-of-School Youth Expenditure, and**

**2) Individual Training Account for At-Risk In-School Youth**

#### **#1 - Waiver Subject: Out-of-School Youth Expenditure**

##### **Statutory and Regulatory Requirement:**

Tennessee is seeking a waiver of Section 129(a)(4)(A) and 20 CFR 681.410 which requires not less than seventy-five percent (75%) of funds allocated to states under section 127(b)(1)(c) reserved under Section 128(a) and available for statewide activities under subsection (b) and not less than seventy-five percent (75%) of funds available to local areas under subsection (c) shall be used to provide youth workforce investment activities for out-of- school youth (OSY).

##### **Background:**

Tennessee has many initiatives that are supporting individuals in their pursuit of post-secondary education in order to propel themselves and their families to self-sufficiency and increased social mobility. TN workforce initiative Drive to 55 – the Drive to get 55 percent of Tennesseans equipped

with a college degree or certificate by the year 2025 – has increased the higher education enrollments and demands all agencies to answer the call for support. TN Promise, one initiative under Drive to 55, offers high school graduates two years of tuition-free education for community or technical college. TN Pathways is the K-12 initiative under Drive to 55 and supports alignment among K-12, postsecondary, and industry to provide students with relevant education and training to jumpstart their postsecondary degrees and credentials.

**Waiver Request:**

Reducing the percentage of expenditures for out-of-school youth from seventy-five percent (75%) to fifty percent (50%) would allow the State and Local Workforce Development Boards (LWDBs) ability to meet the needs of In-school youth (ISY) in the local demographic area.

The State is requesting liganacy in the expenditure requirement for the specific barrier to effectively serve and assist in the success of our Governor's Drive to 55 initiatives (TN Reconnect and TN Promise), our Governor's Investment in Vocational Education (GIVE) Act, TN Department of Education (Carl D. Perkins Vocational and Technical Education) initiatives and other ISY focused initiatives.

**Reason for the Request:**

The seventy-five percent (75%) OSY expenditure requirement limits the ability of the State and local areas to:

- Consider local demographic needs and direct resources to youth population determined to have the highest need for that area.
- Effectively support TN Governor's initiatives and partner with State agencies.
- Prevent at-risk ISY from dropping out of school and from increasing the number of OSY in the State.

**Actions Undertaken to Remove State or Local Statutory or Regulatory Barriers:**

TN applied for the waiver in June 2018 and US DOL ETA granted TN this waiver request for program years 2018 and 2019. TN would like to continue utilizing the flexibility of the waiver beyond program year 2019.

Currently, no state or local statutory or regulatory barriers exist. The State of Tennessee regulation and policy statements are in compliance with current federal law and/or approved waivers.

**Goals and Outcomes:**

As data collected for 2019 becomes available the state will provide the latest outcome:

- The approval of this waiver would permit LWDBs the opportunity to determine how best to meet the educational and training needs of youth, regardless of school status, and specific to the population, geographical location, and economic and employment conditions of each LWDA.
- Additionally, increasing support to ISY while maintaining a focus on serving OSY will help develop a larger pool of young people qualified and prepared to meet the current and future needs of employers in their workforce areas and throughout the state

**Individuals impacted by this Waiver:**

- The ISY who will receive the services as described in WIOA Section 123; Section 129(c)(2) and 20 CFR 681.420.
- Tennessee's youth providers that will increase the number of ISY receiving services based on the demography of the ISY in the local workforce area and across TN.

**Description of the Monitoring Process:**

Tennessee Department of Labor and Workforce Development (TDLWD) and youth providers will be responsible for monitoring the increase of in-school participation rate during the annual monitoring on-site and desktop review.

**Opportunity for Local Board and Public Comment on Waiver Request:**

The waiver request will be included in TN's Combined State Plan and posted on the TDLWD's website for thirty (30) days and for public review and comment, and for comments from our partners. Consistent with general waiver request requirements, TDLWD is adhering to publication requirements to ensure the broadest participation possible including informing appropriate youth program partners such as schools, labor and community-based organizations.

**Waiver #1 Feedback and Revisions requested Friday April 3, 2020:**

**1. 75 Percent OSY Expenditure Requirement The State must provide:**

**a. More discrete projected outcome information;**

The approval of this waiver would permit LWDBs the opportunity to determine how best to meet the educational and training needs of youth, regardless of school status, and specific to the population, geographical location, and economic and employment conditions of each LWDA. It is the goal that partnerships with the local workforce boards and school districts will increase by five percent over the duration of the waiver.

Additionally, increasing support to ISY while maintaining a focus on serving OSY will help develop a larger pool of young people qualified and prepared to meet the current and future needs of employers in their workforce areas and throughout the state. It is the goal that the success rate of in-school youth completing work based learning programs increases 10 percent of the duration of the waiver. It is also the goal to steadily increasing services to in-school youth across the State through intentional partnerships by 10 percent over the duration of the waiver.

**b. Evidence that the State met its goals (performance results) for its last waiver approval;**

Enrollment and services rendered to in-school youth increased over 100 percent from program year 2018 to program year 2019. As more data becomes available, we will continue to share finalized data for program year 2019.

**c. Evidence that the state and/or local areas are in jeopardy of missing 75 percent OR information on past years' attempts to reach 75 percent. (If the data shows the State is spending it, what is the data behind the request?);**

- The State currently has a waiver for program year 2018 and 2019 for a 50 percent expenditure rate for out-of-school youth. The State is meeting that requirement. The State is requesting this waiver to continue utilizing the 50 percent expenditure rate to allow for increased services to youth participating in early postsecondary opportunities, work based learning programs and Governor driven initiatives such as Tennessee Reconnect and Drive to 55.

**d. Description of how the State will continue to serve OSY;**

- The State will continue to develop and maintain Statewide partnerships with organizations that have a heavy focus on the young adult population facing significant barriers to education and employment that will disseminate to local boards. For example, the State is currently delving into exploratory conversations with the TN Urban League, which are located in the four major metropolitan areas of TN that houses the highest concentration of WIOA eligible youth. We are exploring how their connection and services can be shared with local boards in the area to assist with reaching and serving eligible youth.

**e. What are the barriers, or is the state requesting because it has a unique strategy (homeless in-school youth)?**

Yes the State has a unique service strategy for serving in-school youth. During the 2019 program year (PY), the State partnered with TN Department of Education (TDOE) to provide funding support for approved work-based learning (WBL) programs. Data shared with the State from TDOE highlighted that around 1300 students in TN that were participating in WBL programs that identified as economically disadvantaged and were not receiving additional support to ensure their success in their respective programs. Utilizing Statewide funds that qualified under the existing expenditure waiver, local areas partnered with local school districts in their workforce areas to identify WIOA Title I eligible students that are participating in WBL and provide those students with supportive services, paid work experience, incentives, and other WIOA Title I youth services as appropriate. The State and TDOE outlined a service strategy that would address the needs of the currently enrolled students in Phase I and increase student participation during Phase II which was set to occur program year 2020. Due to the recent events with COVID-19 and school year cancellations, Phase I has been extended through June 30, 2021 (PY 2020; school year 2020-2021), therefore requiring Phase II to occur PY 2021. The State's waiver request is to help support the initiative described above and many of the Governor driven initiatives to come that focus on in-school youth.

**#2 - Waiver Subject: Individual Training Account for At-Risk In-School Youth**

**Statutory and Regulatory Requirement:**

Tennessee is seeking a waiver of 20 CFR 681.550 and WIOA Section(c)(2)(D) that allows Individual Training Accounts (ITA) for in-school youth (ISY) ages 14-21.

**Background:**

Tennessee has served both in-school and out-of-school youth (OSY) since the inception of WIOA. With the economy of Tennessee improving and the unemployment data at 3.3 percent (3.3%) as of December 2019, workforce development can effectively use this situation to connect with employers to provide ITAs to at-risk ISY. This juncture of low unemployment in the state will enable the at-risk youth to cultivate their skills in a work- educational environment and give them direction of what they want to do once they leave school. The Individual Training Account provides the at risk youth a wide variety of choices for skills development with an employer. Including enrollment in a community college providing classroom training coupled with hands on experience for a successful employment in the area the youth will excel.

**Waiver Request:**

Request to allow Tennessee to provide ITAs to at-risk ISY and to provide work-based training opportunities, including pre-apprenticeships, along with high-quality occupational training.

**Reason for the Request:**

Youth determined at-risk by the educational institution are not given an opportunity to develop work-skills through the use of work-based training services. Providing ITAs for these at-risk youth will lead to a high school diploma or industry recognized credential and result in skills development including employment opportunities leading to self-sufficiency. It will also decrease the number of school drop-outs in the state. Providing ITAs to at-risk ISY will also allow for better service integration with TN's Governor initiatives such as Drive to 55, Governor's Investment in Vocational Education (GIVE) Act, and TN Department of Education (Carl D. Perkins Vocational and Technical Education) initiatives.

**Actions Undertaken to Remove State or Local Statutory or Regulator Barriers:**

TN applied for the waiver in June 2018 and US DOL ETA granted TN this waiver request for program years 2018 and 2019. TN would like to continue utilizing the flexibility of the waiver beyond program year 2019. Currently, no state or local statutory or regulatory barriers exist. The State of Tennessee regulation and policy statements are in compliance with current federal law.

**Goals and Outcomes:**

- Increase the number of at-risk youth receiving ITAs in work-based programs especially pre-apprenticeship programs
- Help companies to develop new skills based on the need of business to develop young talents
- Promote sufficient pre-apprenticeship programs that youth can access
- Positive impact on all youth to attend pre-apprenticeship or any of the work based services needed to close the gap in talent shortage, while providing hands on experience for youth
- Creates a pipeline of well-educated skilled workers entering the workforce to strengthen the State's overall economy.

**Individuals impacted by this Waiver:**

- Tennessee's Local Workforce Development Boards (LWDBs) that provide quality pre-apprentice services tied to demand occupations in the area.
- At-risk youth who will be positively impacted and who will be given an additional avenue that will enrich their livelihood when entering the workforce.

**Description of the Monitoring Process:**

- Tennessee Department of Labor and Workforce Development (TDLWD) and LWDBs will be responsible for monitoring ITAs and the type of pre-apprentice services provided to at risk youth during the annual monitoring on site and desk top review.
- Ensure work-based training programs are high-quality and meeting industry needs in conjunction with Tennessee Department of Education (Pathways TN).

**Opportunity for Local Board and Public Comment on Waiver Request:**

The waiver request will be included in TN's Combined State Plan and posted on the TDLWD's website for thirty (30) days and for public review and comment, and for comments from our partners. Consistent with general waiver request requirements, TDLWD is adhering to publication requirements to ensure the broadest participation possible including informing appropriate youth program partners

such as schools, labor and community-based organizations. This waiver has is developed in consultation with LWDBs.

**Waiver #2 Feedback and Revisions requested Friday April 3, 2020:**

**2. Youth ITAs The State must provide:**

**a. More discrete projected outcome information;**

Increasing the number of youth pre-apprenticeships by 5 percent over the duration of the waiver.

Increasing the number of in-school youth participating in work-based learning and early postsecondary opportunities by 5 percent over the duration of the waiver.

Increasing the post-secondary credential attainment rate for in-school youth.

**b. Justification should be about program strategy where they are able to use the waiver and details of program design;**

Providing ITAs to at-risk ISY will also allow for better service integration with TN's Governor initiatives such as Drive to 55, Governor's Investment in Vocational Education (GIVE) Act, and TN Department of Education (Carl D. Perkins Vocational and Technical Education) initiatives. The State intends to deepen the relationship with TN Board of Regents (TBR) and postsecondary institutions to support the academic needs of the students that are receiving income driven aid and continue to have unmet financial needs.

**c. As a renewal, how widespread is the use of this waiver and what are the performance results?;**

Areas that have had strong in-school youth partnerships and services saw an increase in utilization of ITAs ISY as well as increase successful completion rates. The State continues to collect data as technical assistance is administered to other local workforce areas whom are still developing partnerships that will allow the use of ITAs for ISY.

**d. Our logic has been that ITAs wouldn't be used for youth younger than 18 or who don't have their HSD yet, but in the request, TN suggests that ITAs would be helpful for getting their HSD and for getting into a pre-apprenticeship program. Please provide clarity on how ITAs would be used for younger ISY if this waiver is approved.**

Under TN's Drive to 55 initiative, TN Reconnect and TN Promise provide federal aid for individuals pursuing a postsecondary degree. Tennessee Reconnect is specifically assisting adults (any age) that are returning to higher education and TN Promise is assisting high school students. In order to receive TN Promise, a youth has to apply and enroll in an eligible postsecondary institution while still in high school. In order to receive TN Reconnect, an individual must meet the independent student status via FAFSA which aligns to many of the eligibility barriers for the WIOA Title I youth program. As stated above, both initiatives are federally funded and only support the tuition aspect. Any tools, books, supplies, testing fees, etc. would not be covered with this funding. Additionally, students receiving TN Reconnect and TN Promise are often receiving Pell Grant. Pell Grant is typically awarded to low-income students. Providing support via ITAs to the youth would help ensure that they have the tools, supplies, and other items they need in order to successfully complete their academic goals. In partnership with TN Board of Regents (TBR), data has been shared with the State that reflects that of the 40 percent enrolled receiving Pell Grant, only around 25 percent of them are graduating. For TN Promise, around 70 percent of students are receiving and only about 25 percent are graduating. Students are citing reasons such as lack of child care, transportation, not having the funds to purchase course materials and many other challenges that prevent them from completing or

starting. While the State recognizes that some of the needs cited can be covered through supportive services, the need to expand the expenditure requirement for in-school youth would allow the State to assist more of this population with those needs as well as providing ITAs to the population to cover any costs that would not be covered by other federal aid and supportive services. The federal funding above would only support those individuals that have received a high school diploma. Allowing ITAs to the in-school youth population also allows the State to support dual enrollment opportunities that high schools students are participating in.

## Title I-B Assurances

The State Plan must include assurances that:

The State Plan must include	Include
1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	Yes
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes

The State Plan must include	Include
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

## Adult Program Performance Indicators

### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	83.5%	82.0%	84.0%	82.5%
Employment (Fourth Quarter After Exit)	83.5%	82.0%	83.5%	82.5%
Median Earnings (Second Quarter After Exit)	\$6,650	\$6,650	\$6,680	\$6,680
Credential Attainment Rate	59.0%	63.0%	60.0%	63.5%

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Measurable Skill Gains	52.0%	52.0%	53.0%	53.0%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

## Dislocated Program Performance Indicators

### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);

- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	82.5%	82.0%	82.5%	82.5%
Employment (Fourth Quarter After Exit)	82.0%	82.0%	82.0%	82.5%

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Median Earnings (Second Quarter After Exit)	\$7,000	\$7,600	\$7,100	\$7,650
Credential Attainment Rate	69.0%	66.0%	70.0%	67.0%
Measurable Skill Gains	48.0%	48.0%	49.0%	49.0%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

*"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

## Youth Program Performance Indicators

### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	79.5%	76.0%	80.0%	77.0%
Employment (Fourth Quarter After Exit)	79.0%	75.0%	80.0%	76.0%
Median Earnings (Second Quarter After Exit)	\$3,300	\$3,300	\$3,400	\$3,400
Credential Attainment Rate	70.0%	69.0%	71.0%	70.0%
Measurable Skill Gains	45.0%	45.0%	47.0%	47.0%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

*"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

## Program-Specific Requirements for Wagner-Peyser Program (Employment Services)

All Program-Specific Requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

### a. Employment Service Staff

1. Describe how the State will staff the provision of labor exchange services under the Wagner-Peyser Act, such as through State employees, including but not limited to state merit staff employees, staff of a subrecipient, or some combination thereof.

The State will continue to use merit staff to carry out labor exchange.

2. Describe how the State will utilize professional development activities for Employment Service staff to ensure staff is able to provide high quality services to both jobseekers and employers

Staff from all partner programs in the center are cross trained regarding the specifics of each partner program in order to make meaningful referrals for participants and to avoid duplication of services, in entering activities that are required when they provide any assistance to an individual and in the use of Labor Market Information that is provided in Jobs4TN to assist participants with career path

choices. Staff are aware of how to refer a customer to a job posting as well as how to result the outcome of that referral if information is obtained. Case noting is used to give an account of interactions between staff and customers.

### **3. Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance (UI) program and the training provided for Employment Services and WIOA staff on identification of UI eligibility issues and referral to UI staff for adjudication**

Tennessee's Unemployment Insurance (UI) Benefits System, called Geographic Unemployment System (GUS) is fully integrated with the Workforce Services Virtual One-Stop (VOS) system. When a claimant files a claim for UI benefits a Wagner-Peyser application within the VOS system is automatically created. This allows AJC staff to immediately begin the process of working with the claimant-assisting with Job searches, providing any necessary education and/or training to get the claimant back to work through the RESA program.

AJC staff can see the active status of a current UI claimant in the VOS system. However, they do not have access to any additional information. In the event a claimant is experiencing issues with their UI claim staff are trained to alert the UI representative within the AJC or route the claimant's information to UI Assistance through Workforce OneTouch (Zopin Chat or Zendesk) or call the UI Assistance Team.

The Tennessee Department of Labor & Workforce Development, in partnership with other agencies and critical stakeholders, provides a series of regional and statewide training activities to cover important topics that involve multiple programs. This serves as the primary means by which training is delivered collectively with the state's various programs. These opportunities offer training and awareness capacity for the staff responsible for leading the state's Re-Employment Services and Eligibility Assessment (RESEA) program.

The staff that lead the RESEA program serve as the primary connection between core programs and the Unemployment Insurance (UI) program. Training and awareness strategies for the RESEA team, in addition to the mentioned training activities, center on policy review, technical training, and ongoing communications with the UI program. All issuances of Unemployment Insurance Program Letters are reviewed and distributed across the RESEA team, as well as to key staff members in other core programs. Through the state's virtual one-stop system (VOS), including the state's issue management/referral system (Zendesk), RESEA staff have the ability to efficiently collaborate with UI program staff to address UI eligibility issues. Through the established technical system – VOS and Zendesk, ongoing communications provides the capacity for learning to occur across the programs. This framework also provides a means for tracking this learning and issue resolution to properly manage this strategy, as well as offer artifacts to train new staff.

### **b. Explain how the State will provide information and meaningful assistance to individuals requesting assistance in filing a claim for unemployment**

## compensation through one-stop centers, as required by WIOA as a career service

The Unemployment Insurance division has partnered with Workforce Services with the goal of placing a UI presence back in each American Job Center (“AJC”) across the State. We understand that many of our customers require hands-on assistance in filing an unemployment insurance assistance claim or weekly certification. This partnership also helps to drive the customer to the AJC where additional Workforce Services programs can be provided if applicable. This is a multi-year project. The first goal is to place a presence back into each of the nine (9) regions of the State. We are currently on target to meet this goal, as we currently have a presence in five (5) regions.

The second goal of this project will be to place a UI presence in each comprehensive AJC in the State. Once this is fulfilled, we will work to place a presence in each affiliate AJC within the State.

Additionally, customers who contact the UI division via phone or live chat for assistance are being directed to the nearest AJC with a UI presence if the customer needs additional assistance that cannot be provided over the phone or live chat.

Informational handouts have been prepared for all AJCs and affiliates (including those without a designate UI representative) for customers who seek additional guidance on filing a UI claim or certification. These include step-by-step guides, complete with screenshots from the Jobs4TN.gov website.

### c. Describe the State’s strategy for providing reemployment assistance to UI claimants and other unemployed individuals

Unemployed individuals receive multiple services from all of the required programs located within the American Job Center (AJC). For those programs that do not have staff physically present within the AJC, referral systems are in place to ensure that customers receive assistance with wrap-around services that they may need to obtain self-sustaining employment. The State of Tennessee is also in the process of putting into place a Virtual AJC for customers, which will allow services to be provided to customers virtually.

The State of Tennessee provides Re-employment Services and Eligibility Assessments (RESEA) assistance to claimants who are determined to be most likely to exhaust their Unemployment Insurance (UI) benefits, providing more intensive assistance to those who are selected to participate. RESEA is designed to reduce UI duration, strengthen UI program integrity, and establish an entry point to other workforce system partners. This program will be going through an evaluation in the upcoming months to determine if some changes to the way the program works will result in increased success for claimants in obtaining employment, as well as shorten the length of time that claimants are receiving unemployment benefits.

### d. Describe how the State will use W-P funds to support UI claimants, and the communication between W-P and UI, as appropriate including the following:

# 1. Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act;

Coordination of and provision of labor exchange services for UI claimants includes the Welcome Function, Skills Development, and the Business Services Function.

**Welcome Function and Basic Career Services** - a shared function between all AJC partners must include the Virtual OneStop greeter (VOS greeter) kiosk as part of the point of entry. The kiosk must display the VOS greeter. Participants must be checked in via the VOS greeter to determine priority of service, reasons for the visit, service needs, and to track customer flow; greet all customers and create a positive first impression. Services associated with the welcome function include the resource room, self-directed activities, and staff-assisted services with few staff members involved. Job seekers are encouraged to register in VOS. Other functions include the following:

- Eligibility determination for WIOA
- Outreach, intake, and orientation to inform applicants and participants of all One-Stop services
- Initial assessment of program participants
- Labor exchange services
- Provision of labor market information, access to the resource room, access and information concerning other programs and services
- Labor market employment statistics
- Information and direct referrals to supportive services and assistance
- Information on performance and program costs on eligible providers of training services by program and type of provider
- Assistance in establishing eligibility of programs for financial assistance for training and education not provided by WIOA

**Skills/Career Development Function and Individualized Career Services**- Staff serving in skills and career development capacity will provide access to education and training for those with barriers to employment, including those with disabilities. Follow-up services must be provided, as appropriate, for participants who are placed in unsubsidized employment after the first day of employment. AJC staff serving in the skills/career development function:

- Determine eligibility during outreach and intake
- Perform skills assessments on program participants
- Determine skill levels and service needs for adults and dislocated workers
- Provide labor exchange services
- Develop individual employment plans
- Arrange for case management
- Identify support needs, group and/or individual counseling and mentoring, short-term pre-vocational services, internships, and employment opportunities

- Arrange for soft skills training, internships, and work experiences which are linked to careers, workforce preparation activities, financial literacy services, out-of-area job search assistance, English language acquisition, and integrated education and training programs

**Business Services Function** - The AJC staff involved in the business services function:

- Build positive relationships with employers
- Identify opportunities to address the human resource needs of employers
- Design services and products to assist employers in meeting their employment needs.

This function is the bridge between business and job candidates and coordinates AJC staff members to actively recruit and refer qualified job candidates based on the needs of business. Activities associated with the business services function include:

Business outreach and development

- Standard and customized recruitment and referrals for job vacancies, primarily for targeted business and industry
- Job candidate qualification review
- Provision of economic, business, and workforce trends
- On-the-job training, contracting, and work experience
- Referral to community services

LWDBs may conduct business services or contract these services to a separate entity, or a combination of both. Regardless of whether a LWDB chooses to provide business services or contract these responsibilities, the plan concerning how business services are conducted must be clearly outlined in a local plan. Shared information and data agreements may be used to support access to information and to support information sharing between the partners, as permitted by authorizing laws and regulations.

Unemployment staff are not located in all American Job Centers, but Welcome Function staff in the AJC provide meaningful assistance to participants if needed.

Non-program participants who enter the job center strictly to use the self service options available in the center are all self service activities and do not result in an active Wagner Peyser application.

Job placement services include referral to employers, customized recruitments, job fairs, sharing job leads, setting up interviews for customers, coordinating with business services teams to fill openings, and other activities connecting customers to employment opportunities. Job placement efforts focus on the locally approved target wage and/or jobs with meaningful career and wage growth opportunities.

## 2. Registration of UI claimants with the State's employment service if required by State law;

In the State of Tennessee, customers file a claim for unemployment benefits using the Virtual One Stop (VOS), Jobs4tn.gov. Filing a claim online creates a partial WP application in the system as required by State law. Those claimants selected for RESEA services or receiving intensive services in the AJC will have the partial WP application completed and participation created by the staff.

### 3. Administration of the work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and

With the use of the Virtual One Stop, claimants are required to answer weekly questions during their certifications that would identify any potential eligibility issues that UI adjudication would need to address. Additionally, the system allows claimants to conduct their job searches online through the Jobs4tn.gov website in order to remain compliant with UI requirements for work searches.

The Virtual AJC will facilitate providing job finding and placement services for those claimants who do not come into the AJC. AJC business services staff and career specialist staff work together to facilitate job seekers' access to available positions, as well as employers' access to qualified candidates for employment.

### 4. Provision of referrals to and application assistance for training and education programs and resources.

The creation of the virtual AJC system will facilitate the provision of comprehensive career services for all job seekers, to include UI claimants. The State of Tennessee AJCs provide services to include assistance with training, referrals to appropriate partners and programs, providing assessments, career guidance and planning, work-based learning, workshops on job-related topics, job searches, and placement. Additionally, AJC staff members provide business services to employers, to include work-based learning opportunities, as well as matching job seekers to businesses' needs.

AJC staff are knowledgeable regarding the appropriate training program(s) for career pathways. Systems are in place in each AJC for referrals to be made and results of these referrals to be tracked when customers are determined to need training assistance and education programs through partner programs.

e. **Agricultural Outreach Plan (AOP).** Each State agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of WIOA. The AOP must include an assessment of need. An assessment need describes the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

1. **Assessment of Need.** Provide an assessment of the unique needs of farmworkers in the area based on past and projected

agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

Tennessee is considered a non-significant state for Migrant Seasonal Farm Workers (MSFW) as defined by the Department of Labor. This means that the state is not considered to have a large MSFW population, nor any significant local offices. Tennessee has provided job service to 8 MSFW during Program Year (PY) 2018. Though several factors contributed to limiting the number of MSFW workers, a prominent one was the increase in H2-A workers. In 2018 agricultural employers placed 432 job orders, requesting a total of 4,128 H2-A workers. In 2019, these job orders increased to 476, requesting a total of 5,128 H2-A workers. The H-2A program continues to expand in response to employers' requests.

The State Monitor Advocate collaborates with our National Farmworkers Jobs Program (NFJP) Tennessee Opportunity Program (TOPS). The advocates cover all three grand regions of Tennessee. The main crops throughout the regions range from, tobacco, soybeans, hay, cattle, corn, cotton, goats and chicken. Agricultural activity significantly does not change from previous years or across regions. Throughout the state a common thread relates the basic needs of farm laborers as those dealing with chronic unemployment at times due to weather, lack of work due to seasonal produce and a desire to obtain secondary training to further their education. A continued need for workers is present on family farms throughout the state especially when productivity depends on the weather such as strawberry crops, spinach and lettuce. Agriculture has evolved to high maintenance equipment with modern training needed. The need is present for training on and off the farm. With the cost of training including cost of books, supplies, loss of employment due to attending class, the need for monetary assistance is great along with obtaining certification in skilled training for job placement. Agriculture has evolved to high-maintenance equipment with modern training needed.

Training has become a large part of the agriculture industry. Welding, industrial maintenance and even computers have become common practice to keep up to date on the modern farm. Training to work on the farm and training for better employment to leave the farm have become a necessity for job placement with above standard pay.

On the intake with the client, a career assessment is completed for direction with the client's training needs. Tennessee Opportunity Program has a long-standing relationship with the Tennessee Colleges of Applied Technology (TCAT) throughout the state, which offer training classes that can be completed in less than a year. The training does not require much travel to a local TCAT, which offers flexibility to the farmworker and limited loss of productivity to the employer. TOPS offers a stipend to pay to those that are eligible for the MSFW program while in training.

Within our state, some farms employ H2A workers in the visa program to process cotton which runs from March to November yearly. These businesses have expressed the need for qualified labor and often advertise for farm workers with much resolution.

Not only is training a valid need by MSFWs in all regions so is career services, youth services, and other related services. The Tennessee Department of Labor & Workforce Development assisted in awarding grant opportunities through Governor Lee's Governors Investment in Vocational Education (GIVE) Act. These grants provide promising partnerships and career pathways in agricultural industries for youth to include MSFW youth. Below is a list of information we provide to each enrollee. This information provides participants with the basic understanding of applicable services in our program, as well as programs in other organizations.

- **Career Services** – skills assessment, outreach, job search (JOBS4TN), placement assistance, short term vocational training.
- **Training Services** – occupational skills, work experience, on-the-job training, skills upgrading, and retraining.
- **Youth Services** – tutoring, paid and unpaid work experiences needed, occupational skills training, financial literacy training, and guidance/counseling.
- **Related Assistance Services** – short- term direct assistance that helps the MSFW and their family members retain their agricultural employment or to participate in intensive training services.

#### Employer Needs:

In partnership with other units within the Tennessee Department of Labor & Workforce Development, along with other agencies, the MSFW unit engages in conversations regarding changing demands for skills in the agriculture industry. Currently, there are several innovative efforts being led by new employers in the agriculture technology industry, which have called on the agency to provide guidance and strategy on cultivating a workforce with the skills to addressing a growing reliance on technology, data, and even drone devices.

While the new needs in the agriculture industry are in the early adoption stage, the collaboration across the various workforce programs, such as apprenticeships, are providing new solutions for employers in the agriculture industry.

Housing Needs: The largest percent of farm labors within our state can return home at the end of the day without being housed on farm property. However, if housing needs arise for the MSFWs, TOPS has referrals options in place to assist with housing needs or emergency services. TOPS housing programs provide assistance with completing paperwork for housing loans, finding homes for farmworkers only, and assistance with utilities.

MSFWs often have immediate need for employment. TOPS help with on-the-job training and work experiences for current job placement. Each client at intake for training or immediate job replacement receives referrals to the local American Job Center for possible assistance and information on the Supplemental Nutrition Assistance Program (SNAP), along with local food banks.

The availability and quality of farmworker housing supports better economic outcomes for MSFWs and their families. This includes direct payments for emergency and temporary housing and for direct investments in housing assistance for MSFWs at their permanent residence. Indirect services assistance includes leveraging services to increase or maintain housing stock available to farmworkers and housing development designed to improve living conditions for underserved farmworkers.

#### Other Needs:

Due to the closing of small area hospitals in rural regions of the state, there is a shortage of healthcare access and options for many MSFWs. This has been addressed by TOPS' case managers in all three grand regions. The limited access also applies to emergency care.

Food and utility assistance are often an issue dealt with for farm labors. Participation in SNAP is encouraged, and referrals to apply are often given at intake of information which then offers partnerships and co-enrollment with SNAP Employment and Training for services and opportunities.

2. An assessment of the agricultural activity in the State means:  
1) Identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity; 2) Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce); and 3) Identifying any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State

Tennessee's agricultural sector includes farming and related industries, as well as value-added food and fiber products, processing, and manufacturing. Tennessee's agriculture accounts for over 10 percent of the state's economy and generates \$74.8 billion in output, which is an increase of 4.6 billion in less than 5 years. Tennessee is ranked 2nd in the United States meat goat inventory and ranks in the top five states for production of tobacco, fresh market tomatoes, and snap beans; ranked in the top 20 for cotton production, soy bean production and corn production and ranked 8th for the number of farms. During 2019, Tennessee's estimated number of farms was over 77,300. Over 41 percent of Tennessee's total land area is farmland (10.8 million acres), with cropland accounting for over 49 percent of farmland. More than 13 million acres produce income of about \$288 million in timber sales annually. About 349,000 Tennesseans are employed in agriculture. The state's top five agriculture commodities, cattle/calves, soybeans, broilers, nursery crops, and corn, comprise about two-thirds of the farm-marketing cash receipts. Crop cash receipts totaled almost \$3 billion; soybeans, led those receipts and steady with almost \$760 million. Tennessee's top-ranking crops are soybeans, corn, wheat, cotton, tobacco, and hay.

The top five labor-intensive crops in Tennessee are tobacco, soybean, hay, cotton, and corn. There are also other products such as the harvesting of tomatoes for processing, the cutting of lettuce and spinach, cotton, and strawberries requiring intensive labor and with very short harvesting periods. For instance, strawberries must be harvested within a maximum of 4 weeks. Farmers harvesting these products usually require farm labor. The peak seasons of sowing and harvesting is from February to August. Geographically, Tennessee's prime activity is in Middle Tennessee, with activity also occurring in West and East Tennessee.

Demand for migrant workers continues to increase at a rapid pace. The number of seasonal workers requested for H-2A visas jumped 28 percent last fiscal year to 8,565. Increases have level out as tobacco demand has dwindled and the soybean market has been a real negotiating factor with China. While farmers demand for H-2A visas has been steadily growing, the 2018 growth outpaced recent annual increases stated the American Farm Bureau Federation Director of Energy and Environment. In Tennessee, there are nearly 70,000 farming operations and the sector contributes more than \$74.8 billion to the state's economy. According to the Tennessee Department of Agriculture and the University of Tennessee's Institute of Agriculture farming and agriculture production employs more than 350,000 Tennesseans.

Current economic factors that have negatively affected the agricultural workforce in Tennessee are the national efforts to reduce the use of tobacco and the consequent reduction in that crop's demand; and the low unemployment rate which has resulted in former agricultural workers finding higher paying, year-round, employment in industry with benefits like group insurance and overtime pay not available on farms. Of course, weather conditions such as above average precipitation and

abnormal spikes in heat could possibly affect crop yields. In the summer of 2019, some tobacco farmers lost their entire crops to angle leaf blight. Many tobacco farmers are experimenting with growing hemp but the marketability of this crop is still speculative.

3. An assessment of the unique needs of farmworkers means summarizing Migrant and Seasonal Farm Worker (MSFW) characteristics (including if they are predominantly from certain countries, what language(s) they speak, the approximate number of MSFWs in the State during peak season and during low season, and whether they tend to be migrant, seasonal, or year-round farmworkers). This information must take into account data supplied by WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, other MSFW organizations, employer organizations, and State and/or Federal agency data sources such as the U.S. Department of Agriculture and the U.S. Department of Labor (DOL) Employment and Training Administration

Tennessee is considered a non-significant state for Migrant Seasonal Farm Workers (MSFW) as defined by the Department of Labor. This means that the state is not considered to have a large MSFW population, nor any significant local offices. Tennessee has provided job service to 8 MSFW during Program Year (PY) 2018. Though several factors contributed to limiting the number of MSFW workers, a prominent one was the increase in H2-A workers. In 2018 agricultural employers placed 432 job orders, requesting a total of 4,128 H2-A workers. In 2019, these job orders increased to 476, requesting a total of 5,128 H2-A workers. The H-2A program continues to expand in response to employers' requests.

## 4. Outreach Activities

The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

Like years prior, because Tennessee is considered a non-significant state, TDLWD has not received allocations for large array of MSFW-outreach resources. Thus, most of such state-outreach efforts have been implemented by the Tennessee Opportunity Programs (TOPS), 167 National Farm Worker Jobs Program (NFJP) grantees. However, TDLWD plans to continue assisting TOPS with outreach services. The following portrays the various steps leading to an active enrollment in the TOPS:

- The SWA will coordinate with local One Stop Offices to continue training and explanation of services offered
- Case managers reach out to farm communities to identify prospective candidates for the TOPS.

- Once farm workers are identified, and they demonstrate a compelling interest to obtain new skills and pursue different and more productive career tracks, intake applicants are completed.
- Eligibility documents are sought – including birth certificates, selective service registration documents, drivers' licenses, work visa, etc.
- Interviews are held, eligibility is confirmed and skill needs along with ABE and other service needs are identified. Furthermore interviews are conducted and testing of cognitive skills is established. Next an IEP is developed, then training & services are secured.
- Core services are cooperatively arranged and training providers as well as service providers are identified.

TOPS also helps MSFWs with housing, transportation, and financial emergencies, so some of their services to MSFWs are not exclusive to reeducation, skills training, and obtaining jobs. In the most recent quarter, TOPS served 24 new participants to raise their total being served to 101 during the quarter. This compares with 86 MSFWs being served by TOPS the same quarter a year ago.

One complicating factor effecting outreach efforts is the fact that our MSFWs are not concentrated in a few selected enclaves but are scattered throughout the state in small family centered groups where the farms are larger and/or more numerous but far from populated areas where more services are available.

If additional services are needed that are beyond the scope of TOPS training and employment and supportive services, the clients are given referrals to other programs such as Vocational Rehabilitation, Veterans Services, or Senior Corps Programs. TDLWD's staff plans to coordinate with TOPS Directors and case managers to register MSFWs with the goal of notifying MSFWs of the services provided by TN's American Job Centers (AJCs) formerly known as One-Stop Career Centers. TDLWD will also coordinate with TOPS to use the mobile career coach units to bring TDLWD's services to MSFWs in their home communities. TDLWD plans to join the Tennessee Migrant Network Council, a coalition established by TOPS, in efforts to provide MSFWs with a more comprehensive array of resources and services. The Tennessee Monitor Advocate will collaborate with National Farmworker Jobs Program (NFJP) grantees, public agencies, agricultural employer organizations and others in providing services to MSFWs for a cohesive continuum of service.

The federal government has recently begun a heavy emphasis in Apprenticeships and our governor has appointed a Director of Apprenticeships. The Alien Certification Unit has specifically been tasked with developing a plan to utilize the upcoming apprenticeship programs as they develop in its outreach to MSFWS.

Preliminary planning includes contacting Future Farmers of America chapters in the high schools and the various county agents of the USDA to help determine areas of greatest need. Outreach efforts will be expanded to include student groups like 4-H, FFA, and agricultural majors.

In December 2019, the United States Department of Labor unveiled its new Agricultural Connection program which includes multiple new sources for guidance and information to the states to enhance states' services to the entire agricultural community including MSFWs.

Outreach responsibilities are split between two state staff. Each person using 50 % of their time on outreach. Outreach activities include but not limited to:

- Coordinate with SWA's/One Stop Offices to continue training and explanation of services offered.
- Coordination with the SMA quarterly meeting with staff and case workers
- Case managers reach out to farm communities to identify potential candidates.
- Once SFW's are identified, and they demonstrate an interest to obtain new skills and more productive career paths, intake/pre-applications are completed.
- Required eligibility documents are needed, birth certificates, selective service registration, driver's licenses, work visas.
- Interview of potential applicant, WRAT(ABE) test, barriers listed, then eligibility confirmed, and an Individual Employment Plan is developed for the training or services needed.
- Core services, training providers, service providers are identified.

## A. Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices

Tennessee is collaborating with agricultural organizations such as Farm Bureau, UT Extension, Agricultural Workforce Management Association, National Agricultural Consultants LLC, Youngblood & Ass. PLLC, Seasonal Hands LLC, ALS, Inc. and education organizations that reach out to MSFW's in other ways than normal. Additionally, the State Monitor Advocate (SMA) and the NFJP will begin to share referral information from outreach activities conducted in the field.

When a Migrant and seasonal farmworker is hired because of an agricultural job posting in our Agricultural Recruiting System (ARS) we, state staff, Tennessee Opportunity Program (TOPs) or both together will conduct a field. After employment is confirmed state staff with the Tennessee Opportunity Program will set a date for onsite field visit.

Examples included but not limited to:

- Call the farmer or farm before visiting. Ideally lunch times or the end of the day are better options;
- Outreach visits can consist of day field visits, housing facilities, service fairs, churches/religious activities;
- No political activities do not enter work areas or housing areas without permission;
- Visits can consist of educating their rights as workers such as wage/hour rights, field sanitation, free from discrimination, right to written contracts; housing complies with state, federal, and local health codes; and
- Knowing the path of the complaint system/outlets on local, state, and federal levels. Receive, log, refer complaints to local SWA's.

**B. Providing technical assistance to outreach staff. Technical assistance must include trainings, conferences, additional resources, and increased**

collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the Employment Service and Employment-Related Law Complaint System (“Complaint System” described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

The SWA will coordinate with local AJC Offices to continue training and explaining services offered. These services involve:

- Availability of Referrals to training: The SWA refers any interested MSFW the appropriate agency that can better serve the MSFW in the needed training.
- Supportive services that include making sure the MSFW knows his/her rights under the law, ensuring that such workers have access to the necessary equipment at the AJCs, and explaining to the MSFW the purpose of Jobs4TN is and how to access and utilize the system.
- Career Services through Jobs4TN enables the participant to apply for any jobs that meet their skill set. State will ensure the full range of employment services are made available to the MSFW population. Area office staff will consider the preferences, needs, and skills of individual MSFWs and the availability of job and training opportunities.
- Employment opportunities: The MSFW can again utilize Jobs4TN. Also, the SWA can refer the MSFW to any agent that currently works with employers in the State.
- Other organizations: TOPS, another Tennessee organization serving MSFW in the State empowers migrant and seasonal farmworkers and other disadvantaged Tennesseans to achieve economic self-sufficiency. This is done by providing services that address their individual needs.
- Farmworkers Rights: In terms of employment, MSFW participants have the same rights as any resident of Tennessee. However, acquiring those rights might be more difficult than normal given some barriers. Therefore posters are available at the AJCs in English and Spanish explaining those rights. Posters are also handed out at farms to the employer and employee to ensure that their respective rights under the law are known.

### C. Increasing outreach worker training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues

The Unemployment Insurance division has partnered with Workforce Services with the goal of placing a UI presence back in each American Job Center (“AJC”) across the State. We understand that many of our customers require hands-on assistance in filing an unemployment insurance assistance claim or weekly certification. This partnership also helps to dive the customer to the AJC where additional Workforce Services programs can be provided if applicable. This is a multi-year project. The first goal is to place a presence back into each of the nine (9) regions of the State. We are currently on target to meet this goal, as we currently have a presence in five (5) regions.

The second goal of this project will be to place a UI presence in each comprehensive AJC in the State. Once this is fulfilled, we will work to place a presence in each affiliate AJC within the State.

Additionally, customers who contact the UI division via phone or live chat for assistance are being directed to the nearest AJC with a UI presence if the customer needs additional assistance that cannot be provided over the phone or live chat.

Informational handouts have been prepared for all AJCs and affiliates (including those without a designate UI representative) for customers who seek additional guidance on filing a UI claim or certification. These include step-by-step guides, complete with screenshots from the jobs4tn.gov website.

All current UI issues pertaining to worker training and core programs within the Department of Labor and Workforce Development are handled through referrals in Workforce One Touch and addressed by the Division of Employment Security, which has oversight of the Unemployment Insurance program.

#### **D. Providing State merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers**

Technical assistance is provided on an annual basis to all staff across the State for services and resources available to MSFW. Staff members are also provided with annual training on how to handle complaint issues within the AJC.

#### **E. Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups**

Due to the non-significant status of the state, the majority of outreach is completed by the NFJP grantees.

An MOU is currently in place between both agencies. Needs of MSFW's in the American Job Centers are addressed by helping those individuals register as well as identification and explaining other services to MSFW's. Those services include Vocational Rehab, Adult Education, Supplemental Nutrition Assistance Program and others. Additionally, to meet the needs of MSFW's in Tennessee, collaboration with agricultural organizations (previously stated) both public and private is ongoing. Furthermore, the State Monitor Advocate (SMA) collaborates with agricultural organizations throughout the state concerning training events, outreach efforts, and data sharing.

Tennessee will develop a contact list of various MSFW agencies and organizations like Telamon, TN, Department of Education - MSFW, Southern Migrant Legal Services, and other nonprofit farmworker organizations.

To expand on our previous answer. TOPs and the State Monitor Advocate meets quarterly with case workers to discuss many topics, one being, creating ways of out reaching. One way that was created is one state staff person while completing H2A housing inspection would provide service information to the employer as well as the MSFW if one does in fact exists on the farm. The SMA and TOPs share MSFW geographical and demographical information. This helps TOPs to expand outreach specifically into areas of high migrant populations. Additionally, we share referral information with one another if we can offer services the other doesn't. The SMA has outreached to MSFW non-profits

(included in previous answer) and other stakeholders to build working relationship. By creating numerous relationships, we are able to more effectively the MSFW population.

## 5. Services provided to farmworkers and agricultural employers through the one-stop delivery system

Describe the State agency's proposed strategies for:

A. Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. This includes:

i. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers

ii. How the State serves agricultural employers and how it intends to improve such services

Tennessee American Job Centers will offer migrant and seasonal farmworkers (MSFW) the full range of employment services, benefits, and protections, including counseling, testing, job training, and referral services. MSFW, on a proportionate basis, shall not receive fewer services than non-MSFW. AJC staff will consider the preferences, needs, and skills of individual MSFW and the availability of job and training opportunities. All office staff will make job order information clear and available to MSFWs in all local offices. This information will include Job Bank information in AJCs where it is available. Such information will be made available either by a computer, hard copy or by any other equally effective means. Each significant MSFW local office will provide adequate staff assistance to each MSFW to use job order information effectively. In those offices designated as significant MSFW bilingual offices, such assistance will be provided to MSFW in Spanish and English, wherever requested or necessary, during any period of substantial MSFW activity. The Workforce System provides labor market information, seminars on legislative changes, job-order service that helps companies fill vacant positions, new employee assessment and screening services, job fairs, and transition services for employees of plants that are closing, and more. The Workforce System will build on the department's success through increased coordination, leveraged funds, seamless customer service delivery, and functional alignment of services redefined throughout this integrated plan. For example, the Regional Business Service Team located in each LWDA is a collaboration of WIOA Adult/Dislocated Worker, Wagner- Peyser Labor Exchange, TNECD, Vocational Rehabilitation, Adult Education and all partners of the AJC; all of these ensure that the needs of business and industry are met. Local Business Service Teams have been developed within the AJCs to work collaboratively to reduce duplication and further streamline service delivery for employers. Tennessee is expanding Business Engagement in the AJCs to include the following:

- Sector convening to clarify and articulate the education and training pathways into high demand and emerging occupations;
- Identifying systemic opportunities for improved service delivery so that more youth and adults access and complete the programs; and
- Connecting both youth and adults with educational and training opportunities to acquire skills and earn credentials required for success in the state's labor market.

In an effort to further support these efforts the state is working on identifying "capacity" which is a significant priority. By convening functional best practices workgroups regionally, across American

Job Centers and across state and local agencies we will continue to work to ensure that all partners have state of the art information and are developing and sharing practices that benefit job seeker, business, partners and community customers of our systems. A recent business services forum brought together stakeholders to discuss the viability of current business services strategy.

## **B. Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups**

Currently, the SWA works with agents that represent the employers to train them on how to use JOBS4TN. In addition, any job seeker is referred to the site has support to create a profile, navigate the website, complete job applications, create and post resumes and search for jobs meeting the job seeker's skill set.

Majority of the current marketing of the compliant system is by traditional ways. This includes posting of pamphlet material and "one pager" paper poster that each employment service agency posts in lobby. Additional methods include referrals to U.S. Department of Labor Employment and Training Administration (<https://www.dol.gov/agencies/eta/agriculture/monitor-advocate-system/services>), our State website (<https://www.tn.gov/health/health-professionals/hcf-main/filing-a-complaint.html>) or word of mouth, while hosting quarterly meetings, out reaching to stakeholders, and by electronic means when appropriate .

## **C. Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity.**

Tennessee American Job Centers, Tennessee Colleges of Applied Technology (TCAT), and the mobile Career Coaches actively promote the availability of agricultural openings and encourage U.S. workers to apply for these positions. Agricultural Job orders are posted on the state website JOBS4TN in an effort to meet the recruitment needs of employers. TDLWD provides education and training on agency services to agricultural employers' caseworkers in an effort to meet the needs of MSFW's in Tennessee.

Tennessee WIOA Grievance and Complaint Resolution Procedures are currently post on our state website TN.GOV ([https://www.tn.gov/content/dam/tn/workforce/documents/ProgramManagement/WIOA\\_Grievance\\_and\\_Complaint\\_Resolution\\_Procedures\\_Guidance.pdf](https://www.tn.gov/content/dam/tn/workforce/documents/ProgramManagement/WIOA_Grievance_and_Complaint_Resolution_Procedures_Guidance.pdf))

To help increase and improve publicity of the complaint system additional guidance is given to our National Farmworkers Job Program through trainings with case workers. Training materials used include electronic means such as PowerPoint and Word Documents. Moreover, Tennessee Opportunity Program regularly distributes their Migrant and Seasonal Farm Workers materials promoting the complaint resolution process. Our American Job Centers display posters to highlight the compliant resolution process for Migrant and Seasonal Farm Workers. These posters are also displayed at every agricultural employer's migrant housing.

In addition to our previous submitted answer the State Monitor Advocate (SMA) in conjunction with State Work Force Agency's (SWA) will promote our Agriculture Recruiting System JOB4TN.GOV to employers, which includes but not limited to:

- word of mouth
- referrals
- electronic methods (internet, email, fax etc.)
- onsite handing of ARS promotional materials to employers; such as flyers and pamphlets during H2A inspections

## 6. Other Requirements

### A. Collaboration

Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

Per the Memorandum of Understanding between Tennessee Department of Labor and Workforce Development and the Tennessee Opportunity Programs, NFJP grantee, the parties mutually agree to collaborate and complete the following activities:

- Outreach efforts to the MSFW population will be coordinated between TOPS and their case managers. Case manager's efforts include but are not limited to reporting outreach activities, providing information for all services available to MSFW and reporting MSFW complaints to the appropriate organizations. Outreach plans will be shared between the parties to better serve and implement new outreach strategies.
- To reach MSFW's in areas where outreach doesn't occur the parties will develop strategies to ensure those areas are served. Developing those strategies may include the use of technology and other innovative outreach plans, as well as collaboration with other state/local agricultural organizations.
- Participants will be entered into Tennessee's job exchange system, Jobs4tn.com, otherwise known as the Virtual One-stop System (VOS) or its successor.
- When possible, the participants will be co-enrolled. The parties will collaborate on how to create strategies to avoid the duplication of services and maximize each other's effectiveness in meeting MSFW needs.
- The parties agree to the sharing of information regarding, including but not limited to, outreach activities, outreach contacts made, number of participants enrolled, number of referrals made, services provided, labor market and wage information and services available.
- Coordinate Emergency Assistance needs for MSFWs
- The parties agree to meet quarterly (July-September, October-December, January March and April-June) either in person or by other communication means.
- The parties will ensure that all and any confidential information shared through the implementations of this MOU is to be protected and only seen by staff. Such information will only be used in conjunction as to a legitimate business purpose as determined by the respective party.

In addition to continuing the collaboration with TOPs, Tennessee works with the Southern Migrant Legal Services and Conexion Americas, and establishing relationships with state agencies and nonprofits that provide services to MSFWs.

## B. Review and Public Comment

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.

The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

There were no comments received on the AOP, however, information and suggestions were solicited from:

- Core and Partner Program State Departments
- Local Workforce Development Boards
- Tennessee Opportunities Programs (TOPS)
- NFP grantees

## C. Data Assessment

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

After reviewing the last four (4) years of performance the State has and will continue to meet the goals set. Both MSFWs and non-MSFWs have received the same quantitatively services. Although the goal has been consistently met, we are continuously improving the ways to better serve both non-MSFWs and MSFWs.

## D. Assessment of Progress

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

The State believes that all goals were reached as laid out in the previous year's AOP. The State used TOPS to outreach to farm communities to identify prospective candidates. After those MSFW the one-stop centers would try to pursue different and productive career tracks for those MSFW. Testing of cognitive abilities was achieved as well as placing the MSFW with the best opportunity for employment. Core services were identified and training was arranged with different providers as needed. Furthermore, if there were additional services needed beyond the scope of what could be offered, the clients were referred to other programs such as Vocational Rehabilitation, Veterans Services, or Senior Corps Programs. Not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

### E. State Monitor Advocate

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

The Tennessee State Monitor advocate has reviewed and approved the AOP for Tennessee.

## Wagner-Peyser Assurances

The State Plan must include assurances that:

The State Plan must include	Include
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	Yes
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	Yes
4. SWA officials: <ol style="list-style-type: none"> <li>1) Initiate the discontinuation of services;</li> <li>2) Make the determination that services need to be discontinued;</li> <li>3) Make the determination to reinstate services after the services have been discontinued;</li> <li>4) Approve corrective action plans;</li> <li>5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days;</li> <li>6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and</li> <li>7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.</li> </ol>	Yes

## Wagner Peyser Program Performance Indicators

## Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);

- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	66.0%	69.0%	67.0%	69.5%
Employment (Fourth Quarter After Exit)	66.0%	66.0%	67.0%	67.0%
Median Earnings (Second Quarter After Exit)	\$4,700	\$4,700	\$4,800	\$4,800
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

# Program-specific Requirements for Adult Education and Family Literacy Act Programs

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

## a. Aligning of Content Standards

Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The Tennessee Department of Labor and Workforce Development (TDLWD) over the previous four (4) years has implemented College and Career Readiness standards (CCR). During that four (4) year timespan TDLWD lead trainings across the State for local providers for the proper implementation in classrooms. While the CCR standards have been implemented in Tennessee, refining and ensuring practitioners are implementing them properly in the classroom will be the focus of the next four (4) years. TDLWD plans to refine and expound CCR standards in several ways, including formalizing and virtualizing training for instructors, creating standardized lesson plans that align to content standards to be available electronically to instructors, and having specialized staff to facilitate in person training and new staff on-boarding.

TDLWD will begin utilizing a Learning Management System (LMS) for the purpose of both training and curriculum development. Many providers develop their own methods of training and determine what materials are most suitable for instruction. Having program discretion to determine how teachers are trained and what materials will be used in instruction leads to various models across the State. Utilizing an LMS to develop both training modules and materials will lead to a coordinated and consistent effort in training and instructional delivery. To carry out and execute the implementation of the extensive training and material development will be entrusted with specialized staff.

One staff member will focus on the development of teacher resources such as lesson plans, curriculum, and assessments within the LMS. The second staff member will work alongside the first in the execution of training and curriculum implementation. The two staff members will have their responsibilities grounded in the CCR standards, and ensure they are being taught in all classrooms.

## b. Local Activities

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

### Adult Education and Literacy Activities (Section 203 of WIOA)

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;

- Family literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that—
  1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
  2. Is for the purpose of educational and career advancement.

**Special Rule.** Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

1. Recipients of Adult Education grants in Tennessee shall operate services in compliance with the Workforce Innovation and Opportunity Act and its regulations and guidance. Providers will collaborate with local workforce areas and community partners to ensure that participants and employers have access to services available under WIOA Title II. Adult Education services provided in the local areas of Tennessee will be carried out by an eligible provider as determined through a competitive application process. Eligible providers will be selected based on their past demonstrated effectiveness and whether their application meets all requirements set out in 231(e) of WIOA. Applicants can represent either individual entities or consortiums of entities writing for grant(s).

During the Request For Application (RFP) competition two (2) different grants will be competed and awarded. One grant contract will be awarded for Adult Basic Education (ABE) encompassing ABE, Adult Secondary Education (ASE), Corrections Education, and English Language Acquisition (ELA)). The second grant contract competed will be for Integrated English Literacy and Civics Education (IELCE). Successful applications for the grants will have met requirements listed under 34 CFR §463.20, and will have illustrated that all services required under each grant will be executed. As a part of meeting the thirteen (13) considerations under §463.20, eligible providers will have to illustrate how they plan to meet the requirements of local plans and coordinate with workforce partners in serving participants. This planning will include how providers will operate and fulfill needs as part of the one-stop system via the American Job Centers (AJC). Having 23 comprehensive centers in Tennessee, adult education providers are expected to either co-locate or have a direct linkage with each center. Applicants will be well informed of the regional needs on the one-stop system and the State initiatives.

Applicants for the IELCE grant contract will be selected in the same manner as those

applying for ABE grant(s). IELCE applicants will need to address all considerations of §463.20 in context of providing IELCE services. Applicants will also need to provide insight as to how they will provide instruction on the rights and responsibilities of citizenship and civic participation and provide instruction that is concurrent and contextual with workforce preparation activities and workforce training.

Successful applicants will have thoroughly addressed State initiatives focused on services to rural counties, transitioning participants to post-secondary training or enrolling them in pre-apprenticeships, and corrections and re-entry education. While the State has specific initiatives to be affected, applicants will need to be able to provide services in order to meet the core performance metrics of WIOA §116 (2)(A)(i). The State initiatives should be founded around required performance metrics. To enforce performance expectations performance based funding will be instituted after the initial year of the grant contract period.

RFP materials will be vetted by the State and Office of Career, Technical, and Adult Education ensuring that all elements are defined for potential applicants. With the approved RFP materials, competitions will be held to award grant contracts to eligible providers. Upon determining a successful applicant, grant/contracts will be awarded and services will be executed. Eligible providers of ABE grants will offer ABE, ASE, and ELA when relevant, to populations in need in the service delivery areas; IELCE will provide services for those areas with the greatest need. Once providers are established they will provide Adult Education and Literacy, ELA, IELCE, Workplace and Workforce Preparation Activities, and Integrated Education and Training (IET) services in service areas.

#### **Adult Education, Literacy, ELA, and IELCE**

Adult Education and literacy activities will consist of ABE instruction that aligns to the College and Career Readiness Standards (CCRS) and is below the postsecondary level that increases an eligible individual's ability to read, write, and speak English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent, transition to postsecondary education and training, and obtain employment.

ELA instruction will be designed to help eligible individuals who are English language learners achieve competence in reading, writing, speaking, and comprehension of the English language that leads to attainment of a secondary diploma or its equivalent and transition to post-secondary education and training, or employment.

IELCE services are for adults who are English language learners in literacy, English language acquisition, and the rights and responsibilities of citizenship. This instruction must be provided concurrently and contextually with workforce preparation activities and training, with the ultimate goal of placing participants in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Providers will strive towards providing comprehensive activities under §203 of WIOA, but at a minimum will provide adult education and literacy activities, ELA, or IELCE contextually for workforce preparation activities, whether in a workplace or in a traditional classroom setting. While these services are available through providers, the services may only be implemented where a population is identified in need (ELA services may not be active in areas where a population has not been identified or is seeking services). IELCE Services will be provided in local areas where a provider has been awarded IELCE specific grant funding. Local activities will align with other partner services within the AJC where efficient and equitable, as well as local partners within the regional communities.

## **Workplace and Workforce Preparation Activities**

Workplace Adult Education and Literacy Activities instruction consists of adult education and literacy activities offered by an eligible provider in collaboration with an employer or employee organization at a workplace or an off-site location that is designed to improve the productivity of the workforce.

Workforce Preparation Activities are programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education or training, or employment.

Providers will develop workplace adult education and literacy activities and workforce preparation activities in coordination with employers, local workforce boards, and Economic and Community Development. Where specific needs are identified via employers, providers will adapt and contextualize instruction for literacy and arithmetic for the employer needs. Providers will provide general soft skill and workplace preparation activities, such as digital literacy, where specific employer or industry needs are not identified.

## **IET**

Integrated Education and Training instruction is a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.

The State will work in developing processes and resources, packaged and readily available for providers, to easily implement IETs. Providers will operate IETs in collaboration with Tennessee Department of Education, Tennessee Board of Regents, Tennessee Higher Education Commission and local employers.

In summary TDLWD and providers of adult education services will work to provide a suite of differentiated activities that fall within the defined activities of §203 of WIOA.

2.

While not all activities listed under §203 will be provided by every provider, they are allowable if service and funding allows a provider to do so. The activities and services defined below will be dependent on the operative local provider and the area needs. Services will always begin with an intake process. Intake should incorporate determining the student's goals in attending the program, assessment, and having a career pathway created to help inform the instruction needed to achieve the student's goals. Upon the initial determination of needs and planning, students will be placed in the appropriate classes incorporating the local activities needed to meet individual goals. All instructional services should be guided by career pathways and the necessary instruction that leads to a student's transition to better opportunities.

## **Preparation Activities - Adult Education and Literacy, ELA Services, and IELCE**

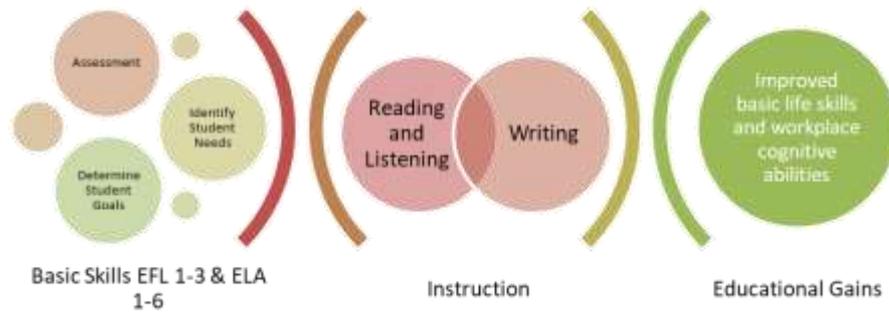


Figure 6 – TN Adult Education Exam Preparation Graphic #1

Providers will structure services to provide basic education to participants for skill improvement. At the foundation of each program the focus is on creating a pipeline of participants. By strengthening those that have deficiencies in various academic areas will ensure that the end goal of sustainable employment is achievable. To ensure that the participant needs are met, providers will have strong foundational instruction in literacy and numeracy, and the ability to provide supplemental services to students with heightened education barriers.

Programs will strategically provide services to students based on their placement via assessment in order to provide instruction in deficient areas. Majority (55%) of participants in adult education in Tennessee are assessed at grade levels 0-5 (Educational Functioning Levels (EFL) 1-3). With a high percentage of students served requiring foundational education in literacy and mathematics, instruction has to be provided and designed to bolster the foundational knowledge needed in these subjects. Providers must be adaptive to the needs of the student, whether they are in literacy or numeracy, and will structure classes so that lower functioning students are not overwhelmed with higher level instruction. As students are assessed and identified as having low levels of literacy (EFL 1-3 and ELA 1-6) the instruction will be focused on improving the students' understanding of basic literacy solely. The method of approach will be the same for those assessed at low levels of numeracy. This approach will continue until the individual shows significant gains in the subject of deficiency.

Upon successful movement into EFL 3, instruction will begin to blend literacy and numeracy while strengthening the connection of the instruction to career pathways. Ensuring the alignment with the CCR standards, providers will utilize vendor and TDLWD resources for the purpose of providing foundational reading and writing instruction to EFLs ABE 1-2 and ELA 1-6. As mentioned in the previous section, all providers selected through the competition process will implement these services in the various local areas across Tennessee.

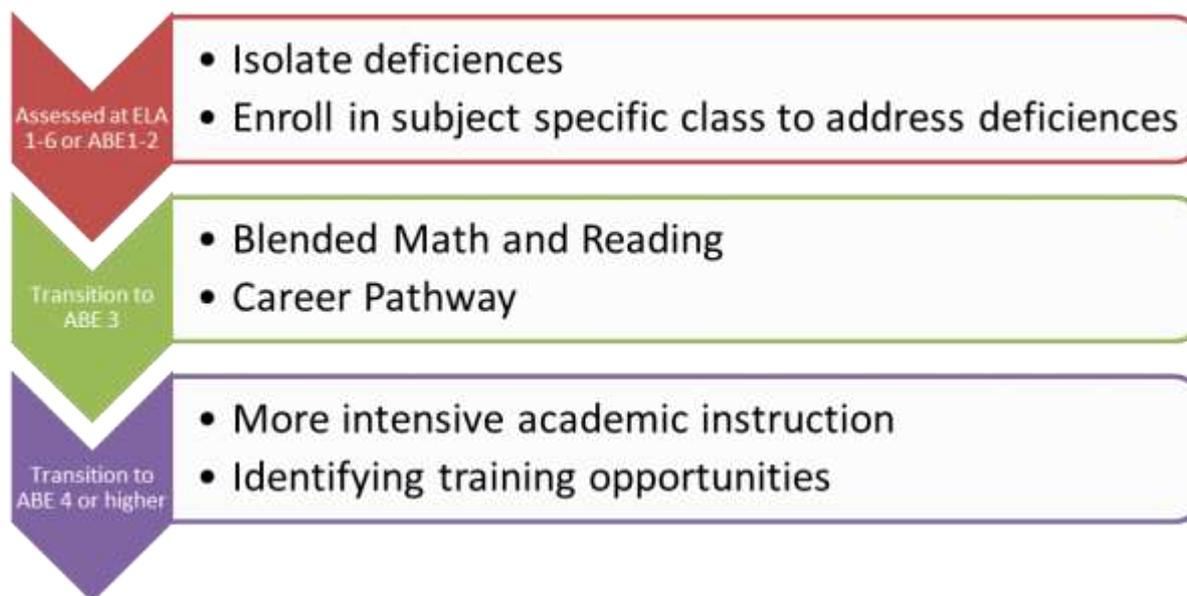


Figure 7 – TN Adult Education English Language Acquisition (ELA) Graphic

Classes for these individuals will be structured so that they are subject specific for reading and writing. Programs will have the opportunity to identify the method of enrollment for their program. Providers will utilize open or managed enrollment and schedule the classes based on the convenience of the classes. The improvement of literacy will improve the student's success throughout program. By identifying EFL 1-2 needs and serving teaching to those needs, uniquely apart from EFL 3-6, progress will be more easily obtainable, as a teacher's instruction will not be distracted with competing attention of high level students.

Providers are encouraged and should assist employers with workplace adult education and literacy activities and workforce preparation activities. Employers have identified various needs that can be addressed by adult education providers. Services of this nature have/are being provided to employers for ELA and basic skills education. This initiative will be expected to be carried forward in future competitions by providers.

Adult education and literacy, ELA, and IELCE services will be carried out to meet the needs of basic skills participants across the State. The services will also be incorporated for workplace activities and improvement, as well. For those participants that are successful in remediation will be able to take part in more intense services for equivalency and training preparation.

**Exam Preparation and Training** - Workplace Adult Education, Workforce Preparation, and Integrated Education and Training Activities

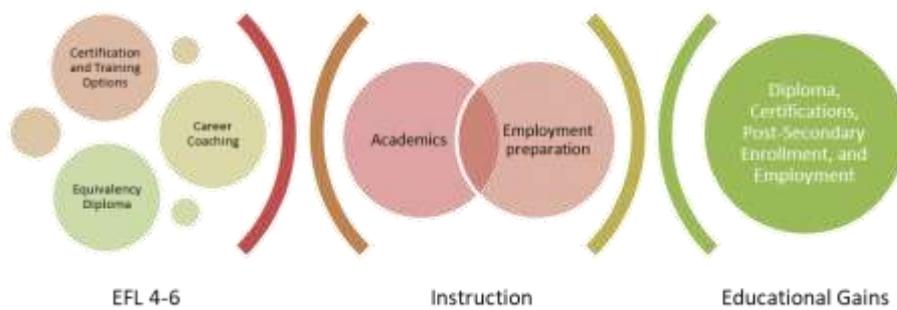


Figure 8 – TN Adult Education Exam Preparation Graphic #2

Students who enter the services at the intermediate and secondary EFLs will be eligible for heightened services that will assist them in developing the appropriate skills for the general workforce and in some scenarios tailored to careers and career clusters. At the intermediate and secondary levels, students will be on a functioning level sufficient to process and perform literacy and numeracy for performing job tasks. The intermediate and heightened functioning level position students to take advantage of models of instruction such as integrated education and training or pre-apprenticeships (these two forms of instruction will be directed by career pathways). Participants at the secondary level in many scenarios are prepared for sitting for the equivalency exam, and may only want to partake in services in preparation for this milestone.

Within the three (3) EFLs 4-6 many students are capable of sitting for the HiSET exam to earn their equivalency diploma if needed. Once equipped with a high school or equivalency diploma (or in some dual enrollment programs, earn the equivalency diploma, and take part in workforce training) students will develop cohorts for career training.

Transitioning students from the lower levels (ELA 1-6 and ABE 1-3) into EFLs 4-6 will begin to focus on preparing for the CCR standards required for the HiSET exam. The expectation will not be that transitioning students move into training opportunities immediately upon achieving heightened education levels, but to focus on the academic element of the underlying literacy and numeracy standards. After sufficient time in the new EFL, students will have the opportunity engage in training opportunities where available, and when they are prepared. Students that initially test in at EFLs 4-6 will be advised of training opportunities in order to help develop career pathways and set goals.

Tennessee is working to develop training opportunities across the state, whether they incorporate post-secondary enrollment or collaboration with willing employers. Training programs will be for stackable credentials for areas of industry that are in need. There has been work towards the development of an Integrated Basic Education Skills and Training (I-BEST). The I-BEST model is currently being explored for the fields of advanced manufacturing, medical, construction, and logistics. Utilizing existing resources in local education agencies, TDLWD will be leveraging existing technical educators and classrooms to provide integrated and contextualized education. Blending basic education along with career pathways/technical education will provide a satisfying, yet expedited, approach for students seeking better opportunity.

Curriculum for intermediate and secondary level students will consist of material available through vendors, as well as, curriculum developed with Tennessee in coordination with workforce partners, TBR, THEC, and DOE. Curriculum developed in Tennessee will be focused on industry needs and help prepare students for high wage, high demand jobs. Services are meant to be fluid in transitioning the lowest EFL students to the end result of higher education or sustainable employment.

### Summary of Activities

The required activities under WIOA Title II will be carried out by local providers. The local providers will work with required partners and their local boards to identify regional needs, and align required activities to meet the workforce needs. Local providers will structure services around the foundation of career pathways. Activities such as Adult Education and Literacy, English language acquisition, and Integrate English Literacy and Civics Education will focus on building the basic knowledge necessary to act as a springboard to other training opportunities.

To provide workforce literacy, preparation, and training activities providers will collaborate with workforce partners and employers to implement create pre-apprenticeship and training programs with higher education. Participants will have the ability not only to work on basic skills, but to also develop skills that will help them into a career or earn heightened degrees.



Figure 9 - TN Adult Education Graphic

### Organization Activities

Organization of local activities will be in partnership between the TDLWD and the local providers. Upon the approval and awarding of grant funds to local providers the local provider will be responsible for carrying out the services specified by TDLWD in the RFP. Providers will be required to carry out the required local activities based on guidance provided by the department of labor, the department of education, and TDLWD. The content discussed above will be part of the plan to execute services in the local areas, but providers, working in tandem with TDLWD, will adapt according to area and student needs. Providers will carry out services in the areas where there is a population to serve. Realizing that area needs differ and change over time, and the content above may prove challenging for certain providers, discretion in instructional delivery is allowed, as long as the spirit of the plan is achieved.

The organization of the activities will be as follows:

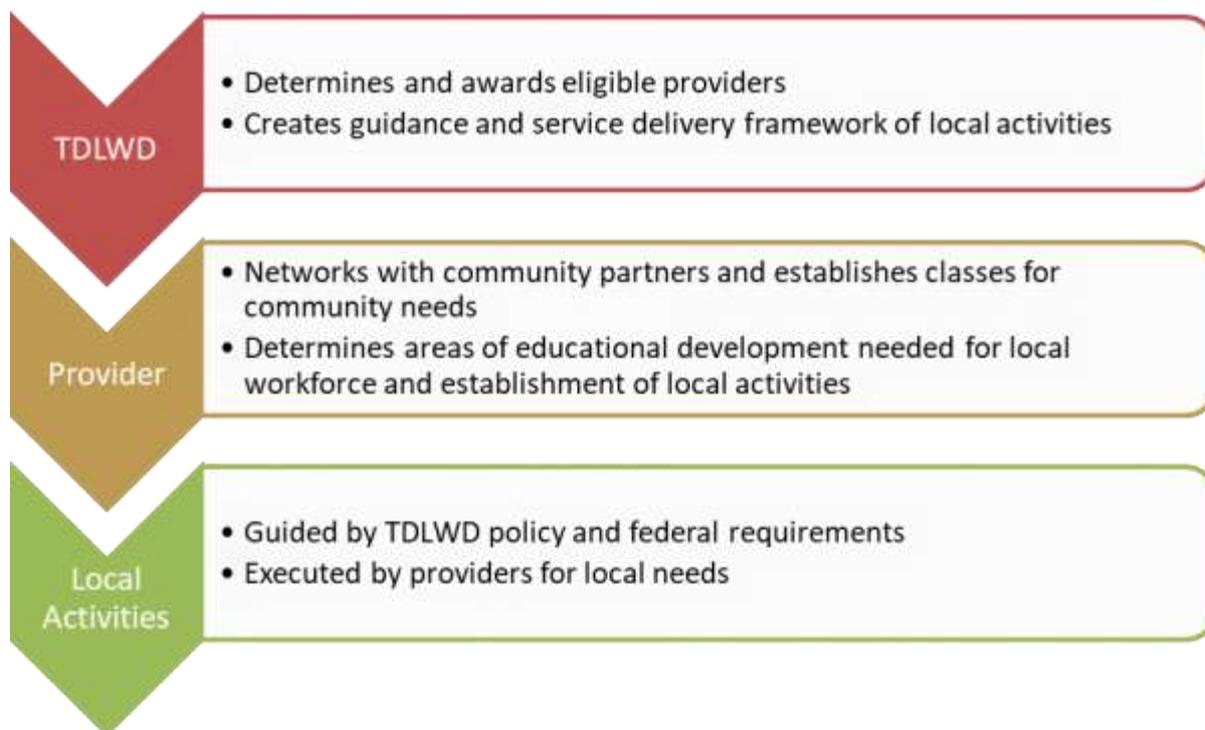


Figure 10 - TN AE Organization of Activities Graphic

### c. Corrections Education and other Education of Institutionalized Individuals

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II subtitle C, any of the following academic programs for:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional

institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

All providers requesting ABE funds must also request corrections education funds (WIOA Sec. 225) to be used for serving incarcerated and other institutionalized individuals in local service areas. During the application grading process TDLWD will identify whether applicants effectively illustrate and narrate whether they plan to and how they serve corrections. Providers will be asked to partner with and serve local jails and institutions in need of adult education services. Providers will collaborate with local sheriffs in order to locate classes within their facilities. Corrections activities and programs may include:

- - Adult education and literacy activities;
  - Special education;
  - Secondary school credit;
  - Integrated education and training;
  - Career pathways;
  - Concurrent enrollment;
  - Peer tutoring; and
  - Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

The specific activities provided will be determined by local adult education leaders and corrections officials. Local providers may consult with TDLWD in designing, implementing, and analyzing specific corrections activities and programs.

Providers that carry services to institutionalized individuals will primarily provide adult education and literacy activities, while opportunities with partners will be available in certain areas. With large populations of incarcerated lacking their high school diploma, providers focus on providing remediation and instruction preparing them for the CCR standards required for successful completion of the HiSET exam. Providers have developed strong relationships with local jails in providing literacy services. Services will entail all available adult basic skills instruction that is available to those not incarcerated. Instruction will be determined through assessment and progress will be gauged with post-testing. Those individuals that reach a functioning level showing preparedness for the equivalency exam will have the opportunity to test.

Training services are not directly provided by adult education providers in institution settings. Providers, in partnership with workforce and postsecondary partners, will assist in providing training services. In areas where technical schools and community colleges are partnered with corrections facilities opportunities such as integrated education and training can be made available. Training opportunities will be limited, as they are reliant on outside partnerships. Providers' role will consist of providing remediation to participants, setting the foundational understanding so that individuals are successful in the more rigorous training provided via the partners.

As Tennessee moves toward registered pre-apprenticeship and apprenticeship programs the services

can be provided to those that are incarcerated. Identifying the proper industry and industry partners for these programs will be key in performing.

Reentry efforts will be more prevalent in conjunction with adult education services. Within the Workforce Services division in TDLWD there is the Reentry program, specifically tasked with providing services to inmates being released. Adult Education and Reentry have been in collaboration to leverage existing provider relationships with local jails to gain access to inmates in order to provide career services to prepare them for release.

## d. Integrated English Literacy and Civics Education Program

Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries, including how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities.

Describe how the State will fund, in accordance with the requirements of title II, subtitle C, an Integrated English Literacy and Civics Education program and how the funds will be used for the program.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

### **Provider Establishment**

TDLWD will utilize the required competition process to identify eligible providers for IELCE. An RFP process will be established and posted for interested parties to apply for IELCE funds. Only programs that have met the standard of demonstrated effectiveness established by the TDLWD will be able to apply for grant funds. Local boards will also provide opinions on how closely applications align to the workforce system and whether local area needs are met. The RFP will be designed so that funds are allocated to areas of the state with large populations of immigrants. This design is to ensure that funding is effectively and efficiently allocated in areas where the greatest benefit can be realized. The RFP process will mirror that of the ABE RFP, but will include the requirements specific to IELCE. Applicants meeting all requirements of the RFP process and receiving the requisite grade will be awarded funds for IELCE services.

### **Expended Program Funds**

Established providers of IELCE services will be required to expend funds for those allowable activities specified in WIOA. Activities that must be carried out are English language acquisition and civics and integrated education and training. Providers will have to demonstrate through the application process that they are adequately prepared to provide ELA and civics services to students so as to prepare

them for employment. Services instructing participants in English and civics should have an integrated education and training model of sufficient intensity for interested participants to take advantage of upon reaching a comfortable functioning level. Once awarded grant funds, TDLWD will monitor IELCE providers for compliance of services provided.

Funds of IELCE will be utilized for providing the requisite staff needed for the intensive IELCE services. Staff will include supporting administrative staff with local providers, but majority of funds will be expended for the purpose of instructors and support staff. Resources such as instructional materials, supplies and professional development of IELCE practitioners will also be purchased with the funds.

### **Workforce Preparation and Integrated Education and Training**

IELCE services are inherently designed and associated for improvement in employment. Services for educating and enhancing immigrants' English skills and civic involvement and improved literacy skills can be directly linked to career readiness. Services will be structured around how to effectively communicate on a job while incorporating workforce preparation activities. Providers of IELCE services will partner with employers to provide developmental services to employees who lack the literacy and basic work skills needed for jobs, in order to equip them with the knowledge necessary for completion of tasks. Employees showing improvement will be better equipped for promotion opportunities, as well as other opportunities within the labor market.

Beyond providing instructional activities related to literacy, English language, and civics, the IELCE program will provide students with opportunities for integrated education and training (IET). The IET component of IELCE programs will be designed with three fundamental parts, each occurring concurrently and contextually and driven by a single set of learning objectives. These three parts include:

1. Adult education and literacy activities (i.e., literacy, numeracy, and English language)
2. Workforce preparation activities (i.e., learning activities that improve a students' general employability skills)
3. Workforce training (i.e., training for a specific occupation or occupational cluster)

The design of an IET program will be for the purpose of a student's education and career advancement, and will be part of a student's career pathway. The IET programs and career pathways will be designed in collaboration with other WIOA partners, and will be based on in-demand occupations within the specific regions of Tennessee.

IELCE programs will incorporate job acquisition and retention skills, and employability skills. Students will also be connected with WIOA One-Stop partners to provide them assistance in identifying in-demand industries in the students' community and connecting them to appropriate training designed to lead to unsubsidized employment and economic self-sufficiency. Further, students will be connected to their local American Job Centers to assist them in job searches and other services designed to lead to unsubsidized employment and economic self-sufficiency. These connections to the local workforce development system and its functions may be made through referrals or memoranda of understanding. Adult Education providers will work to form closer relationships with their local workforce partners and encourage co-enrollment of services, including job searching and job training. Ultimately, this collaborative effort will help place IELCE students in unsubsidized employment.

## **Workforce System Integration**

Providers of IELCE services will collaborate with workforce partners through a referral network and a direct linkage to the American Job Centers. IELCE providers will also work with training providers identified in the workforce development system to design and deliver IET programs. IELCE providers are not expected to offer every possible service of the workforce system, and instead are encouraged to collaborate with the workforce partners in the development of a referral process so as to leverage partner resources.

## **e. State Leadership**

### **1. Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA**

#### **Required Activities**

TDLWD will utilize leadership funds in various methods in order to carryout required activities expected under Sec. 223 of WIOA. These elements will be addressed individually below:

#### **Aligning Adult Education with Core Programs and One-stop Partners**

State leadership funds will be used to fund the development of career pathways and IETs in partnership with TBR and Tennessee Department of Education. A staff member with the TDLWD will work with the workforce partners in aligning and standardizing in need career pathways and IETs for local workforce areas. Upon establishing career pathways the staff member will work with local programs by training them on what career pathways are available, relevant partners, and how to structure services for efficient delivery of the pathways. Standardized models will be created through TDLWD and implemented in local areas. The pathways will be implemented in the local areas dependent on the labor force need and identifying the aspirations of students. The leadership funds will also be utilized to develop training models, such as IETs and pre-apprenticeships to help develop student career pathways and transition them into unsubsidized employment.

#### **Professional Development**

Local providers will be provided with professional development opportunities designed and structured by TDLWD. A specialized staff member at TDLWD will organize and identify quality professional development opportunities for local provider staff that reinforces strong instructional design and support services. Utilizing the network of TBR and educational institutions in Tennessee, this staff member will organize professional training for the delivery of adult education services. The staff member will also collaborate with local providers to develop professional development networks with local providers in order to encourage and drive ongoing professional development amongst peers when formalized training is not scheduled. Professional development will cover instruction (both ABE and ESL), support staff, and leadership. In order to identify training needs of local programs the professional development staff member will collaborate with other TDLWD staff specialized in areas of instructional design, instructional delivery, and student engagement.

Professional development will come in the form of regional trainings, webinars, conferences, and locally lead events. These events will be a combination of techniques mentioned above, whether it is the utilization of higher education, TDLWD staff member, or local work groups.

## **Technical Assistance**

Specialized TDLWD staff members will focus on various areas of services including instructional design, instructional delivery, student engagement, and programmatic performance. Instructional design and delivery will focus on assisting instructors in the delivery of curriculum reading, writing, speaking, mathematics, English language acquisition, and distance education. Staff will also train and implement best practices with support staff that interact with participants concerning outcomes and supplemental services. The intent is to be able to communicate opportunities and help students transition into postsecondary opportunities and employment.

Through the collaboration of TDLWD staff and workforce partners, technical assistance and training will be provided to local providers on the involvement of the American Job Center structure. Assistance will come in the form of training on how to negotiate with partners, communicating limitations, and offerings of the adult education program. Technical assistance will also come in the form of partnering with the provider during the negotiation process, ensuring equity and clear understanding of what is necessary from a service standpoint.

Utilizing TDLWD staff and resources such as Google Suite and various digital literacy vendor products, instructors will have the opportunity to learn how to implement technology through instruction. TDLWD will also implement a learning management system to better track progress and the benefit of instructional modules. Instructors will be trained on the use of the LMS and will be expected to track and utilize its various features.

## **Monitoring and Evaluation**

In accordance with State of Tennessee policy, TDLWD will draft an annual monitoring plan that details the current list of local Adult Education providers, a risk assessment of each provider, and the schedule of formal program monitoring activities. The risk assessment will be based on the following criteria: Continuous years of TDLWD funding and experienced staff; prior monitoring findings indicating levels of deficiency; program performance; number of students enrolled; degree of fiscal-related errors, and degree of adherence to policy and guidance. Based on these criteria, local providers assessed to have the highest risk will be scheduled for formal monitoring in subsequent monitoring cycles.

Local provider monitoring and evaluation will consist of several activities that allow TDLWD to determine both problematic and successful areas of the program, and inform the design and implementation of local and statewide technical assistance. These activities will include:

- Analysis of fiscal data and records
- Analysis of performance data (based on data entered into the statewide MIS, Jobs4TN)
- Analysis of individual student data and records (based on data entered into Jobs4TN and hard copy records)
- Onsite observations of program and staff activities
- Interviews with staff and students
- Surveys of staff and students

Formal monitoring activities will result in TDLWD-issued monitoring reports, and local programs will submit corrective action plans as necessary to ensure problematic areas are addressed. Additionally, TDLWD will conduct informal and remote monitoring activities on a regular basis to review local providers' data and fiscal integrity, and program performance. TDLWD staff will routinely analyze local providers' performance indicators (i.e., student enrollment, MSG, and post-exit outcomes), in particular, in order to identify programs that are most struggling or succeeding, and plan technical assistance accordingly. TDLWD staff will also conduct informal onsite visits to review the operations of the program, provide technical assistance and identify professional development needs.

Monitoring reports will be generated and disseminated to TDLWD staff to inform plans for addressing local, isolated needs, as well as larger, statewide technical assistance and guidance. The best practices gleaned from these activities and reports will also be organized for disseminating to all programs across the state, through both in-person events (e.g., quarterly leadership meetings, annual conferences, regional trainings, etc.) and online communication tools.

## 2. Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable

### **Permissible Activities**

TDLWD will utilize state leadership funding to carry out a combination of the permissible activities under Title II. There will be a strong focus on developing resources for instructional use (as mentioned in the technical assistance section of required activities), transitioning individuals from adult education services to post-secondary, employer and workforce preparation engagement (including English language acquisition and civics), improving teacher quality and retention, and outreach. Support for permissible activities will be conducted through formal training and technical assistance, either with TDLWD staff or contracted entities specialized in the area needed for professional development.

## f. Assessing Quality

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

TDLWD will conduct monitoring and evaluation activities of local adult education providers as outlined in the previous section. Expanding further, an important part of this plan is the regular analyses of performance data that will be conducted in order to assess the quality of the program. TDLWD has recently created and filled a new staff position within the Adult Education Division: a systems & analytics specialist. The specialist will work to create real-time dashboards and various reports that show program performance data, both at the local level and the cumulative statewide level. Specifically, analyses will be conducted on student enrollment, MSG, post-exit outcomes, expenditures, and other areas of interest that indicate program quality. Based on the results of these analyses, TDLWD will conduct technical assistance, design professional development, or issue guidance according to the areas of need in order to improve program quality.

The TDLWD Adult Education Division has a staff member, the director of professional development, who will be charged with the responsibility of reviewing and assessing the adult education professional development system on at least an annual basis. Based on these reviews and assessments, TDLWD will make adjustments in professional development strategies in order to

facilitate continuous improvement in program quality. Furthermore, specific professional development initiatives will include assessments for baseline levels of performance, and benchmark assessments to determine how effective the initiatives are at achieving desired outcomes. These assessments will include both qualitative and quantitative data collection and analyses, and will involve surveys and observations of local program staff, as well as a review of program data entered in the statewide MIS, Jobs4TN.

## Adult Education and Family Literacy Act Program Certifications

States must provide written and signed certifications that:

The State Plan must include	Include
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes
3. The State legally may carry out each provision of the plan;	Yes
4. All provisions of the plan are consistent with State law;	Yes
5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;	Yes
6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;	Yes
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and	Yes
8. The plan is the basis for State operation and administration of the program;	Yes

## Adult Education and Family Literacy Act Program Assurances

The State Plan must include assurances that:

The State Plan must include	Include
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9)	Yes

The State Plan must include	Include
of WIOA;	
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

## Authorizing or Certifying Representative

### CERTIFICATION REGARDING LOBBYING

#### Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of

Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an

officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S.

Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Please download and sign the forms below. Please scan and return the forms to [wioa@ed.gov](mailto:wioa@ed.gov) at the same time you submit your State Plan via the portal.

1. SF424B - Assurances – Non-Construction Programs  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
2. Grants.gov - Certification Regarding Lobbying  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
3. SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable)  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)

<b>APPLICANT'S ORGANIZATION</b>	<b>Enter information in this column</b>
Applicant's Organization	Tennessee Department of Labor and Workforce Development
<b>PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE</b>	<b>Enter information in this column</b>
First Name	Jeff
Last Name	McCord
Title	Commissioner
Email	Jeff.McCord@tn.gov

## Section 427 of the General Education Provisions Act (GEPA)

In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the following instructions posted at <https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc>.

TDLWD plans to conduct various state-level adult education activities with state staff and local programs across the state. TDLWD will ensure that there is equitable access to and participation in all such activities for state staff and local program staff. The steps TDLWD will take include:

1. Training, technical assistance, and professional development activities will be made available to all local program staff, in accordance with their roles in the program.
2. Critical program information will be offered via a variety of media and communication tools.
3. Professional development opportunities will be made available to all state staff members, in accordance with their roles.
4. For hiring practices, equal employment opportunity rules will be followed.

5. For local adult education grant competitions, TDLWD will ensure applicants provide information to meet the requirements of Section 427 of GEPA.

## Adult Education and Literacy Program Performance Indicators

### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	41.0%	40.0%	42.0%	40.0%
Employment (Fourth Quarter After Exit)	42.0%	37.0%	43.0%	37.0%
Median Earnings (Second Quarter After Exit)	\$3,300	\$3,640	\$3,400	\$3,640
Credential Attainment Rate	30.0%	27.1%	31.0%	27.1%
Measurable Skill Gains	35.0%	37.9%	36.0%	37.9%
Effectiveness in Serving	Not Applicable <sup>†</sup>	Not Applicable <sup>†</sup>	Not Applicable <sup>†</sup>	Not Applicable <sup>†</sup>

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employers				

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

## Program-Specific Requirements for Vocational Rehabilitation (Combined or General)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

[13] Sec. 102(b)(2)(D)(iii) of WIOA

### a. Input of State Rehabilitation Council

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

Through data collected during the 2019 Comprehensive Statewide Needs Assessment (CSNA) Survey, the State Rehabilitation Council (SRC) identified seven overarching areas in need of improvement within the Division of Rehabilitation Services (Division). Some of the concerns noted in the VR Portion of the 2016 Combined State Plan are still issues of concern today, while others are new. These seven areas of concern include: talent management, communication and responsiveness, timeliness of services, customer engagement, transportation services, knowledge of community partners and resources, and Pre-ETS. The SRC has addressed these areas in addition to other items in the following input.

1. Talent Management: As direct client services staff turnover is seen as a disruption in provision of services and negatively impacts the relationship and trust that customers have in the VR program, the SRC recommends that the Division place an emphasis on recruiting and

maintaining quality employees at all levels. The SRC recommends that the Division review its salary and benefits packages through benchmarking. While the SRC applauds the Division's efforts to promote from within the organization, new policies and processes should be put in place to speed up the hiring process in order to fill vacancies, reduce client caseloads, and minimize delays in services. The SRC has noted this concern dating back to the SRC Input to the VR Portion of the Combined State Plan in 2016.

2. Communication and Responsiveness: Transparent and timely communication both internally and externally by the Division and its staff are key to ensuring a smooth delivery of services and dissemination of information.
  - a. Improving effectiveness in communicating with customers, by communicating via the most effective method for each customer, is vital to ensuring the success of those customers in achieving their employment goals.
  - b. While the Division is generally included in the DHS Newsletter, the SRC recommends an expansion of this practice and potentially the creation of a separate newsletter that highlights to a greater extent the Division's accomplishments, explores services and current policies, and celebrates customer success stories as a means of marketing the program.
  - c. As the Division embarks on new initiatives, such as reviewing the role of the Community Tennessee Rehabilitation Centers (CTRC's) in the VR process, it is imperative that communication be transparent with both staff and external stakeholders. The SRC appreciates the opportunity provided to the Council for involvement in the review of the CTRC's and encourages the Division to continue to involve the SRC in such initiative.
  
1. Timeliness of services: As customers were overall not satisfied with the timeliness and responsiveness of VR staff, as measured via the CSNA, the SRC recommends that the Division take note of customer concerns by reviewing existing policies and fully utilizing all levels of staff to provide services. This effort should focus on improving the length of time it takes to obtain specific services, such as assistive technology, to improve response time of staff and to improve upon follow-up time.
  
1. Customer engagement: The SRC recommends that the Division create a robust plan to engage customers in being more active and involved in decision-making throughout their case, including, but not limited to, the development of the Individualized Plan for Employment. We recommend the implementation of a customer satisfaction survey to be conducted periodically during an open case and encourage staff involvement in the development of this process. The SRC also recommends creating and utilizing division stakeholders such as the Centers for Independent Living, Client Assistance Program and the Parent Training and Information Center to conduct quarterly trainings on client rights, informed consumer choice, providing peer support, and self-advocacy in order to encourage customer involvement.
  
1. Transportation: Based on CSNA findings, transportation was identified as a major barrier impeding individuals with disabilities from obtaining employment in the community. As such, the SRC recommends that the division reviews policies related to accessing transportation.

Policies should be modernized to address the needs in each community, to include ride-share services such as Lyft and Uber where available, to increase the mileage provided to drivers, to create new partnerships with transportation providers, and to increase access to vehicle modifications.

1. Knowledge of Community Resources and Partnerships: The SRC recommends the development of a method to ensure that division staff receive regular training on existing community stakeholders and resources. This could be accomplished by dedicating time during training or staff conference calls, creating a resources database, and attending community resource fairs. Face-to-face visits during hiring or through alternative worksite locations are another way to learn about other agencies.
1. Pre-Employment Transition Services (Pre-ETS): The SRC recommends that the Division closely monitor and improve the provision of Pre-ETS to ensure the needs of students with disabilities are being met statewide. In addition, the Division must place a renewed emphasis toward expending the required 15% of federal funds for this service to ensure the Division is able to take full advantage of federal funds to meet the needs of customers across the state in all service areas.

## 2. The designated State unit's response to the Council's input and recommendations; and

The recommendations and input offered by the State Rehabilitation Council in the seven (7) priorities listed above, strategically align with the modernization and transformation vision of the Division of Rehabilitation Services. The Division overwhelmingly accepts and agrees with all these priorities and addresses each of them individually below.

Building on these recommendations, the Division of Rehabilitation Services is embarking on a 4-year strategic plan to transform the Vocational Rehabilitation Program and revolutionize the customer experience. Focusing on the customer and the customer experience, the goal of the transformation is to create an environment where individuals and businesses served, along with VR staff and partners feel welcome, informed, and encouraged.

### What Transformation Looks Like...

- VR is responsive, welcoming, informative, and encouraging showing individuals and businesses what is possible.
- Businesses seek out VR services to transform their operations and meet their workforce needs and ultimately improve their bottom line.
- CTRCs are transformed into community-based resource centers offering community-based employment training and connecting VR and non-VR customers to education, training and employment resources.

- Pre-ETS are coordinated, collaborative, connected services that prepare students with disabilities for a seamless transition to life after high school.

To achieve this transformation, the Division has identified 5 strategic priorities outlined in the table below. Each of the strategic priorities listed above can be linked to one or more of the recommendations made by the SRC.

Strategic Priority	Strategic Goal
Communication	Foster trust and credibility with internal and external stakeholders through reliable, accurate, transparent, and timely two-way communication.
Talent Management	Support a professional workforce that is organized and structured to deliver high quality vocational rehabilitation services through effective teams.
Modernization of Systems and Processes	Implement integrated systems and business processes that promote operational efficiency and programmatic effectiveness focused on the customer experience.
Revolutionize Service Delivery	Build innovative and effective service delivery models to better support businesses and individuals with disabilities in driving the achievement of their employment goals.
Data Driven Services and Outcomes	Achieve improved employment outcomes for people with disabilities through data driven rehabilitation services and employment initiatives.

### 1. Talent Management

The Division agrees with and supports the SRC’s recommendations related to talent management and has been taking steps toward addressing this priority. VR senior leadership has reorganized leadership positions and created additional key positions to increase capacity, knowledge, and expertise across all program areas. Various units within the Division have grown to address the needs of those we serve, providers that we work with, and our key stakeholders. Since 2016, the VR Policy and Contracts Units have greatly expanded to help address training needs for field staff and providers across the state. The VR Business Services Unit (BSU), formed in 2016, is in the process of reorganizing and expanding their capacity to optimally serve rural and urban customers. The BSU partners with area Chambers of Commerce, customers, businesses, and state agencies across the state as strategic partners to increase access to needed education and employment resources by connecting individuals to available local and state agency partners that offer employment, education, and apprenticeship resources that support economic stability. Additionally, the BSU works with business and industry partners to aid in meeting their workforce needs with well-trained, job-ready talent.

Over the next four years, the Division of Rehabilitation Services is committed to ensuring that the VR program is staffed appropriately to deliver much needed services to the citizens of Tennessee, as well as ensuring that our staff have the resources and support that they need to perform their job duties effectively and efficiently. Through our actions, we are aiming to:

- Advance a culture of high performance through professional development and accountability;
- Recruit, develop, retain and recognize quality employees and equip them to deliver high quality service through continuous coaching and training; and

- Sustain efforts through staff retention and thoughtful succession planning.

In section (i) (2) of the Vocational Rehabilitation section of the TN 2020 State WIOA Plan, Plan for Recruitment, Preparation and Retention of Qualified Personnel, we address efforts that the Department of Human Services Human Resources and the Office of Talent Management – Learning and Development are taking to actively recruit qualified individuals, as well as retain current staff. These efforts include significant expansion of the agency’s recruiting and advertising sources, development of recruiting process learning modules for managers, and the establishment of a dedicated recruiting team in 2020, which further improves the agency’s ability to attract and retain talent at all levels in the organization.

The Division of Rehabilitation Services is currently assessing and evaluating the Division’s staffing to include a review of position classification and compensation for alignment with the roles and responsibilities of a modernized, community-based vocational rehabilitation program. As part of this review, the Division is looking at the possibility of creating an entry-level non Master’s level staff position to assist our Master’s level Counselors with their workload. We believe this would attract individuals who are interested in the field of vocational rehabilitation and help to create a talent pipeline to the Counselor position or other positions within the Division.

Additionally, Division leadership is in the middle of an internal evaluation of the Division’s approach to professional development including an update and re-design of new counselor training, general staff on-boarding and other professional development opportunities for staff on an ongoing basis.

## **2. Communication and Responsiveness**

The Division agrees with and supports the SRC’s recommendations related to communication and responsiveness and is beginning to take the necessary steps to address this priority. Over the next four years, the Division of Rehabilitation Services is committed to increasing the way that we communicate internally, as well as externally, to ensure that we are actively sharing information and that the information we are sharing is consistent. Currently, Division leadership is working with the DHS Public Information and Legislative Office on finalizing a communications plan for the Division. This plan will allow us to:

- Create and tell a clear story of the Division’s work, priorities, and successes
- Encourage safe and respectful workplace communication with mechanisms for staff to know priorities and express concerns
- Enhance transparency and responsiveness by encouraging open dialogue with stakeholders
- Guarantee staff at all levels embrace stakeholder input and feel responsibility and ownership for partnerships and collaboration

Additionally, a marketing committee is being formed that includes VR staff from all levels and program areas to review current marketing materials and to identify ways to improve upon what currently exists. This committee will be responsible for making recommendations on marketing material and

methods to the DHS Public Information and Legislative Office. One goal for this committee is to ensure that marketing materials are comprehensive and include information on all the various VR programs, including Independent Living, Independent Living Older Blind, Pre-ETS, CTRC, TRC Smyrna, Business Services Unit, etc. VR leadership are exploring ways that would allow and encourage staff to better share success stories and innovative practices across all VR regions. As we transform our Division, the ability to share updated and accurate information among our staff, partners, and the general public is a high priority.

### **3. Timeliness of Services**

The Division agrees with and supports the SRC's recommendations related to timeliness of services. In fact, the Division is re-examining the way that we deliver services. As VR celebrates its 100th anniversary, we are taking a moment to intentionally review and update our processes, reflecting on what's working and identifying opportunities for change.

As part of this internal examination, the Division is currently undertaking the following steps:

- VR staff are currently undergoing an intensive review of VR policies to ensure that they reflect a strengths-based approach and a person-centered philosophy, as well as verify that they are aligned with the Division's mission, vision, and values.
- VR staff are currently nine months into the implementation of a new case management system. The target go-live date is June 2021. The system will empower staff, customers, and providers with access to information that is not always easy to access within our current system, including better and more accurate information related to various timelines within the lifecycle of a VR case, including referral, application and service delivery dates.

As a direct result of the above actions, over the next four years, the Division is going to be focused on what our data tells us about the program that we run and the services that we provide. This data will enhance the capacity of staff to use and analyze data to inform and improve practices and outcomes.

### **4. Customer Engagement**

The Division agrees with and supports the SRC's recommendations related to customer engagement. As part of the communication plan that is being developed, the Division is investigating ways to improve and expand opportunities for customer engagement throughout the vocational rehabilitation process, gathering feedback and input from VR customers at various points throughout their employment journey. The new case management system that the VR program is currently implementing will allow VR staff to survey customers regarding services received, one tool that will help Division leadership better understand the impact of services being delivered. Additionally, Division leadership is looking at ways to further engage stakeholders, such as the Centers for Independent Living, Client Assistance Program, the Parent Training and Information Center, The Arc Tennessee, Disability Rights Tennessee, and the Council on Developmental Disabilities, among others, in efforts related to customer engagement and self-advocacy.

### **5. Transportation**

The Division agrees with and supports the SRC's recommendations related to transportation. Unfortunately, transportation is commonly cited as one of the leading barriers that impedes individuals with disabilities from obtaining employment in the community. The Division is committed to working with partners and external stakeholders on identifying potential solutions, especially those "outside of the box," to address this barrier. Staff representatives from VR participate in a transportation working group, informally convened by the Council on Development Disabilities, where various state agencies, local government representatives, and nonprofit entities collaborate and brainstorm on ways to address the overall transportation barrier impacting Tennesseans, regardless of disability. The efforts of this group are reported out to the Employment First Task Force. Additionally, Division leadership is working with other state agencies on identifying potential pilot programs that could help address the transportation gap in some of Tennessee's more rural communities.

## **6. Knowledge of Community Resources and Partnerships**

The Division agrees with and supports the SRC's recommendations related to increasing VR staff knowledge of community resources and partnerships. A crucial component of the communications plan being developed by Division leadership and staff is encouraging open dialog between VR staff and external stakeholders. By better educating VR staff of resources available via external stakeholders and by better educating external stakeholders and community partners of the resources that VR offers, we will be better equipped to serve the citizens of Tennessee in the communities where they live. VR leadership are also exploring ways that would allow and encourage staff to better share success stories and innovative practices, including unique partnerships, across all VR regions.

The Division is currently assessing how the 17 Community Tennessee Rehabilitation Centers (CTRCs) across the state should be structured to best meet the needs of the individuals that we serve and their communities. As part of this transformation, staff are engaging local government and other local entities in the communities where these CTRCs are located to identify ways to work together and create a more comprehensive service delivery network. We become stronger when working together to achieve similar goals.

## **7. Pre-Employment Transition Services (Pre-ETS)**

The Division agrees with and supports the SRC's recommendations related to improving the provision of Pre-ETS statewide and expending the required 15% of federal funds for these services. As previously stated, the Division is doing an overall internal examination of the way in which we deliver services, including Pre-ETS. The new case management system that VR staff are currently implementing will allow us to better track Pre-ETS services that are being delivered. Additionally, the Division is currently hiring a newly created leadership position, VR Fiscal Director, who will be housed in the Division and will be responsible for understanding and tracking the unique budgetary needs and requirements of the VR program. This will allow the Division to have a better overall view of the VR program's budget, including the need to meet the 15% requirement for Pre-ETS.

Additional information about the Division's strategic priorities can be found in section [I] State Goals and Priorities.

3. The designated State unit's explanations for rejecting any of the Council's input or recommendations.

Not applicable.

## b. Request for Waiver of Statewideness

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

Waiver not requested.

2. The designated State unit will approve each proposed service before it is put into effect; and

Waiver not requested.

3. Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Waiver not requested.

## c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. Federal, State, and local agencies and programs;

The Division has interagency cooperation, collaboration, and coordination with other state and local entities that are not components of the Statewide Workforce Investment System.

The Division works in cooperation with the following federal, state, and local agencies and programs to provide services for individuals with disabilities:

1. The Department of Intellectual and Developmental Disabilities (DIDD) refers individuals with intellectual and developmental disabilities to the Vocational Rehabilitation program.
2. The Department of Mental Health and Substance Abuse Services (TDMHSAS) works with the Division to employ an evidence based Individual Placement and Support (IPS) model of supported employment for individuals with mental illness and substance abuse disorders.
3. The Tennessee Employment Consortium, which is an independent association of community rehabilitation providers and state agencies developed jointly by the Division, the Department of Intellectual and Developmental Disabilities, and the Tennessee Council on Developmental Disabilities, was established to provide a forum for all stakeholders to review and discuss state policies and share best practices.
4. University of Tennessee, Center for Literacy Education and Employment provides marketing to businesses the services provided by the Division, to recruit businesses to hire the Division's clients and to provide staff training and development and consultation services for community supported employment service providers.
5. Tennessee Division of TennCare (TennCare) partners with the Division for the provision of services for individuals enrolled in Employment and Community First CHOICES. ECF CHOICES serves individuals with intellectual and developmental disabilities who are receiving home and community-based programs under Medicaid Long Term Services and Supports.
6. The Tennessee Department of Education (DOE) for the provision of Pre-Employment Transition Services, transition services, and other VR services provided by VR to students with disabilities in order to support an efficient transition from secondary school to post-school employment and related activities leading to competitive integrated employment.
7. The Division is a party to the Interagency agreement between DOE, DIDD, the Tennessee Department of Health, TDMHSAS, the Tennessee Department of Correction, and TennCare to fulfill the requirements of Part B and Part C of the Individuals with Disabilities Education Act (IDEA). The partner agencies strive to ensure that individuals and youth with disabilities are prepared for competitive integrated employment with access to necessary support services.
8. Tennessee Department of Corrections for the provision of community resources to offenders on probation or parole who participate in the TDOC Day Reporting / Community Resource centers.
9. Tennessee Works for employment partnerships and collaborative efforts to increase access to meaningful work and internet-based information for students with disabilities.
10. The Department of Human Services Family Assistance and Child Support Division for individuals participating in services under the Temporary Assistance for Needy Families (TANF) program.
11. Tennessee AgrAbility program for professions in agriculture production. This is a cooperative effort of the University of Tennessee Agricultural Extension Service, Tennessee State University Cooperative Extension Program, and Easter Seals in Tennessee and the division's State Grant for Assistive Technology program, the Tennessee Technology Access Program (TTAP) and their network of technology centers.
12. Tennessee Technology Access Program (TTAP) that increase access to, and acquisition of, assistive technology devices and services. Through its four core programs: Funding Assistance, Device Demonstration, Device Loan and Device Reutilization.

13. Tennessee Council for the Deaf, Deaf-Blind and Hard of Hearing (TCDBBH) that operate in six communities and provide interpreter services and consultation.
14. Statewide Independent Living Council to advance advocacy and independence for Tennesseans with disabilities by collaborating with all interested parties.
15. Tennessee Centers for Independent Living that operate in six local communities are operated primarily by persons with disabilities and provide a variety of independent living services.
16. Community Rehabilitation Providers throughout the state that provide rehabilitation services under a delegated authority.

## 2. State programs carried out under section 4 of the Assistive Technology Act of 1998;

Response provided in section c.1 above.

## 3. Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

Response provided in section c.1 above.

## 4. Non-educational agencies serving out-of-school youth; and

Response provided in section c.1 above.

## 5. State use contracting programs.

Response provided in section c.1 above.

## d. Coordination with Education Officials

Describe:

1. The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students

The Division has chosen to provide Pre-ETS through Transition School to Work agreements with Local Education Agencies (LEAs) for interagency transfer, Pre-ETS contracts through Community Rehab Providers (CRPs), Pre-ETS Summer Camps, and direct staff contact.

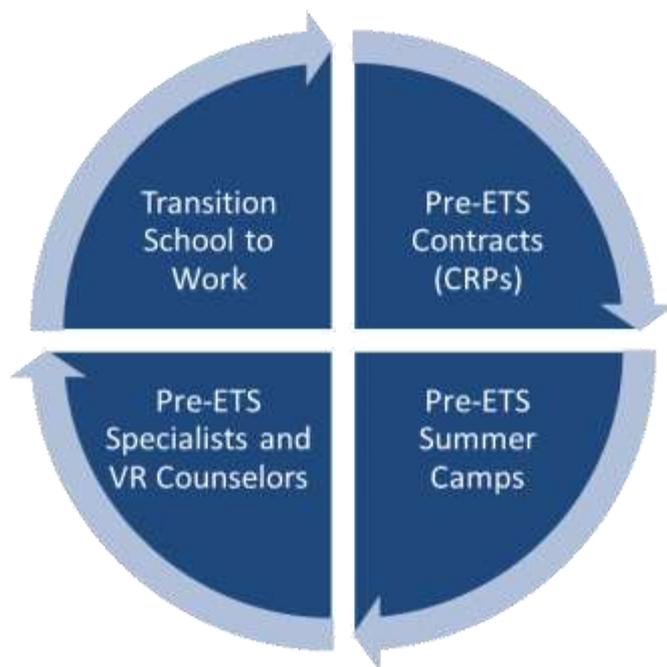


Figure 11: TN VR Pre-ETS Graphic

The Division has hired 23 Pre-Employment Transition Specialists and three Pre-Employment Transition Supervisors to coordinate services provided in their areas, identify Local Education Agencies (LEAs) who have a need for Pre-ETS, and recruit CRPs. They match interested schools and willing CRPs and/or provide services where there are students with disabilities who need the service.

The Pre-Employment Transition Specialists work with the schools to identify students who are of working age who want to become VR clients and make referrals to the VR Counselor assigned to the school.

As of November of 2019, there are 48 Pre-Employment Transition Community Rehabilitation Providers and 47 LEAs contracted to provide services.

## **Transition Tennessee**

An important feature that helped to operationalize the interagency agreement between TN VR and the Department of Education is the creation of TransitionTN.org. This online professional development and resource hub is funded by both the Tennessee Department of Education and Tennessee Vocational Rehabilitation. The site provides portals into an educator blueprint and a provider blueprint where users can participate in asynchronous professional development and get acquainted with a host of resources. For example, there is a Transition Framework, age-appropriate transition assessment database, searchable curriculum database, and so much more. While much of the content was targeted towards a specific target audience, the content in both the educator and provider portals provide cross training opportunities.

## **Policy**

The Division has policies and procedures governing Pre-employment Transition Services (Pre-ETS). These policies and procedures are designed to support field staff in providing quality services and resources to students with disabilities in Tennessee and encourage collaboration between school personnel, contractors, and VR staff. The Pre-ETS policy also explains the process if the student desires to apply for VR services. The goal of the policies and procedures is to offer experiences that can assist transition students to a more positive and encouraging competitive employment outcome.

## **2. Information on the formal interagency agreement with the State educational agency with respect to:**

### **A. Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;**

The Division entered into an exclusive Interagency Agreement with the TDOE in October 2017 for the provision of pre-employment transition services (Pre-ETS). The Agreement lays out the Purpose of the Agreement, VR responsibilities, DOE responsibilities, and mutual responsibilities. DRS was aided by WINTAC, an RSA technical assistance contractor. Training was conducted across the state at the Supervisors of Special Education Study Councils, the Passport to the Future Conference, and the TDOE Partners in Education conference in 2018 and 2019. Additional partnerships with the TDOE to provide ongoing professional development to both local education agencies and vocational rehabilitation staff were provided at the 2019 and 2020 Passport to the Future conference. Plans are being made for a virtual conference in the winter of 2021.

Tennessee VR utilizes 23 Pre-Employment Transition Specialists to provide consultation and technical assistance to education agencies. Each county and local school district has an assigned Pre-ETS Specialist who is required to provide ongoing support, coaching, and technical assistance. Furthermore, the Pre-ETS Specialist complete a monthly VR referral sheet to foster a smooth transition from potentially eligible students receiving Pre-ETS to VR referral, application, and if eligible, VR customer.

Tennessee VR serves alongside the Tennessee DOE in multiple state-level tasks force to promote a shared responsibility and visions for transition planning and services. Some of the groups include, but are not limited to the following:

- TN DOE Transition Leadership Team
- Employment Roundtable

- TennesseeWorks Partnership
- Governor's Employment First Task Force

By serving in these capacities, TN VR has continued to ensure a strong working relationship at the state level with the state education agency. This results in joint planning of state level initiatives, consistent messaging to local school districts, and a deeper understanding of the interplay between the two. One example of how these partnerships produces results is in the design and implementation of DOE permanent course offerings in schools. The TN DOE recognized the important of the Pre-ETS and transition services, while also understanding the limited scheduling opportunities for many students due to graduation requirements. Therefore, upon learning more about Pre-ETS from VR, the TN DOE proposed three credit bearing courses to be made available to students with the course standards having a strong focus on Pre-ETS. The three courses now approved by the Tennessee State Board of Education under the heading of Principals of Transition for Postsecondary Readiness are:

- Introduction to Self-determination
- Focus on Adulthood
- Planning for Postsecondary

## **B. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;**

The IEP team, which should include the Division's staff when invited and when available, parent and student, determines that the student should be referred for VR services. The Division's staff should inform the student and parents, preferable at the IEP meeting, the purpose of the vocational rehabilitation program. VR Staff make every effort to attend IEP meetings, however due to staff resources this is not always possible. Information regarding VR Services is made available during IEP meetings.

Beginning in October 2015, IEP meetings now include information on pre-employment transition services that are available at age 14. Pre-ETS services are available to students with disabilities ages 14-22. Pre-ETS services can be provided without an application for VR services. For those individuals that are interested in applying for services, the information should include the application procedures, the eligibility requirements including the Order of Selection, and the potential scope of services that may be available. As soon as possible after referral, the Division takes an application from the student and determines eligibility as well as whether the student is in an open priority category. If the student is in an open priority category, the Division's staff assists in the formulation of the student's IEP and the student's vocational rehabilitation Individualized Plan for Employment (IPE) as soon as it is determined that the student can benefit from services provided by the Division in preparation for exiting the school system and transitioning into training and/or employment. IPEs are developed within 90 days from the date of eligibility determination, and prior to exit from school.

## **C. Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;**

A no cost interagency agreement between the Tennessee Department of Education (TNDOE) and the Division describes the roles and responsibilities of each to ensure that individuals who are IDEIA

eligible and meet the Division's eligibility requirements and will receive VR Services through a comprehensive and coordinated effort. The agreement negotiated between both agencies is very specific in defining the specific responsibilities for each.

For the Division, VR is responsible for various aspects of making its services available to students with disabilities, including the five (5) required Pre-ETS services through VR staff, contracted CRPs and agreements with individual LEAs. While not a comprehensive list, some of the specific responsibilities of the Division include: providing Pre-ETS on an individual or group basis; providing materials and information regarding the VR process and services; accepting referral of students with disabilities who choose to pursue VR services beyond Pre-ETS; consulting with LEAs on transition planning to prepare a student to move from school to work or postsecondary education; providing information to parents and/or guardians, students/clients; and informing teachers, students, parents and legal guardians of the Rehabilitation Act requirements and implementing regulations.

The Tennessee Department of Education has accepted responsibility for helping the Division encourage participation of Tennessee's over 130 independent LEAs in the provision of Pre-ETS services and helping assure that parents, students and teachers are aware of and have access to Pre-ETS through multiple delivery methodologies including, but not limited to: encouraging LEAs to distribute the Pre-ETS materials to students, family members, guardians, or their representatives; emphasize transition best practices with all LEAs; expand existing technical assistance, training and transition reference materials to include information regarding WIOA to LEAs and other stakeholders, including encouraging the Tennessee Parent Training and Information Center to share information with parents, families, guardians and students relating to the provision of Pre-ETS; develop active communication and outreach efforts to make parents and students aware of coordinated Pre-ETS activities; and provide VR and stakeholders regarding TNDOE's adopted written policies and guidelines regarding compliance with WIOA including the coordinated provision of Pre-ETS.

To ensure that all parties, including the Division, TNDOE and LEAs fully understand and comply with the subminimum wage provisions of WIOA the following term of the agreement was agreed to and included in the agreement: "Neither DOE nor a LEA in Tennessee shall enter into an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a student with a disability is engaged in work at a subminimum wage. Both parties shall adhere to the documentation requirements under Section 511 of the Workforce Innovations Opportunity Act (WIOA) for students with disabilities seeking subminimum wage employment."

Similar to the agreement between the Division and TNDOE, the Division constructs its contracts with CRPs and agreements with LEAs as referenced in section d.1 above with very specific terms for each respectively that includes CRP or LEA terms that outline expected deliverables, timelines, reporting, outcomes and reimbursement procedures. Those scope and general terms are similar regardless of which procurement method is used and include: provision of the Pre-ETS activities for students with disabilities ages 14-22 in accordance with the Public Law 113-128, Workforce Innovation and Opportunity Act of 2014 (WIOA), Section 422, and Code of Federal Regulations, Title 34, Part 361, as amended; assure that only staff meet minimum qualifications detailed in the agreement provide services; accommodate the needs of students with disabilities in compliance with state and federal law, including without limitation the Americans with Disabilities Act; obtain written permission from the student's parent or guardian for demographic information and disability certification; and provide monthly fiscal and program reports of its Pre-ETS activities that document details of services provided.

The LEA is responsible for the educational costs related to the provision of special education and related services for the individual attending school. The agreement states that if another public agency is obligated under federal or state law or assigned responsibility under state policy to provide or pay for any services that are considered special education or related services and are necessary

for ensuring FAPE to students who are IDEIA eligible, the public agency shall fulfill that obligation or responsibility, directly, through contract or by another arrangement. However, failure of that public agency to pay for that service does not relieve the LEA of its obligation to provide that service to an individual with a disability in a timely manner.

The Division is responsible for all costs necessary for eligibility determination and provision of services under an IPE. The Division must consider comparable services and benefits [34 CFR § 361.53 (c) (1)], available under any other program that does not interrupt or delay the progress of the individual toward achieving the employment outcome identified in the IPE.

The Pre-ETS interagency agreement identifies the financial responsibility of the Department of Education (DOE) to ensure that individuals who are IDEIA eligible receive a free appropriate public education (FAPE) in the least restrictive environment. A free appropriate public education means regular and special education and related services which:

1. Are provided at public expense, under public supervision and direction, and without charge to the parent;
2. Meet the standards established by state law, including the requirements of IDEIA Part B and the Rules, Regulations and Minimum Standards for the Governance of Tennessee Public Schools, issued by DOE;
3. Include preschool, elementary school, and secondary school (including appropriate vocational, career or work experience education); and
4. Are provided in conformity with an IEP.

#### **D. Procedures for outreach to and identification of students with disabilities who need transition services.**

When a student who is eligible based on the Individuals with Disabilities Education Improvement Act (IDEIA) standards reaches the age of fourteen, the Individualized Education Program (IEP) team, as defined by 34 CFR § 300.344, formulates a statement of transition service needs as a component of the IEP. The TDOE provides the DSU with data regarding students who are eligible for and receiving special education services under the IDEIA to better identify the statewide needs for pre-employment transition services.

The Division's staff maintains a working relationship with special education supervisors, vocational education supervisors, directors, secondary school guidance counselors, and LEA administrators for the purpose of providing outreach for students with disabilities and technical assistance to school personnel to assist LEAs in preparing students with disabilities for career opportunities. The Division participates in in-service training programs for LEAs, as well as in statewide special education conferences for the purpose of providing information regarding VR services. The Division also participates in and organizes local community job fairs, job clubs, attends civic club/organization meetings to inform students and parents of the purpose of the VR program, the application procedures, the eligibility requirements, and the potential scope of services that may be available.

Other activities to identify students who are potentially eligible for Pre-ETS and are meet the eligibility requirements of Section 504 include completion of student health survey forms coordinated with guidance counselors or general education teachers.

Lastly, the Division, in partnership with ten local education agencies and the Council on Developmental Disabilities, operates 13 High School Transition Project SEARCH® Sites. Those Sites are located as follows:

1. BlueCross BlueShield – Hamilton County Schools
2. Embassy Suites – Rutherford County Schools
3. Embassy Suites – Metro Nashville Public Schools
4. Le Bonheur Children’s Hospital – Shelby County Schools
5. Maryville College – Blount County Schools
6. Methodist North Hospital – Shelby County Schools
7. Parkwest Medical Center – Knox County Schools
8. Sheraton Hotel – Shelby County Schools
9. Tennova – Clarksville-Montgomery County Schools
10. The Peabody – Shelby County Schools
11. Welch College – Sumner County Schools
12. West TN Healthcare – Jackson-Madison County Schools
13. Wilderness in the Smokies – Sevier County Schools

Through the Project SEARCH programs, each site follows the national model for providing transition services to students. The primary objective is to secure competitive employment for people with disabilities. Project SEARCH is driven by collaboration with many community partners: a host business, an education partners, a supported employment provider, VR, and a state or local developmental disability provider. Through this nine-month internships program, people with intellectual and developmental disabilities participate in three 10-week internship rotations where they are able to be fully immersed into that career. In addition, the interns receive daily workplace readiness training. This increases the intern’s ability to be successful in the workplace setting, learn and generalize employability and marketable work skills, and explore a variety of career paths.

The Division contracts with the Cincinnati Children’s Hospital for Community Rehabilitation Provider training and assistance with site development and curriculum implementation. The Division also compensates Community Rehabilitation Providers for workplace readiness training and work-based learning experiences provided to eligible individuals per day. A match requirement is not mandated for this service.

## e. Cooperative Agreements with Private Nonprofit Organizations

Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

The Division continues to maximize the use of community rehabilitation programs to provide rehabilitation services in the most integrated setting possible consistent with the informed choices of the individual.

The Division is utilizing community rehabilitation programs (CRPs) throughout the state as follows:

### 1. Grant Contracts

The Division has established grant contracts based on the needs of individuals with disabilities within Tennessee. These contracts serve to ensure continuation of services for individuals with disabilities, provide adequate service coverage across rural and distressed areas of Tennessee and to establish a reliable supply of needed resources for individuals with disabilities. The Division plans to continue grant contracts with private non-profit VR service providers to ensure quality services statewide, provided funding is available.

The Division has grant contracts with independent living centers across Tennessee. These services are provided in accordance with federal and state guidelines for Independent Living.

The Division also contracts with deaf centers and centers for deaf, deaf-blind, and hard of hearing individuals for the following services:

- Outreach,
- referral, and advocacy;
- interpreting services;
- client assistance;
- Assistive Technology training;
- Peer Counseling Services;
- Workshop and Seminars for sign language interpreters;
- Sign Language training;
- Technology Workshops;
- information and referral to Support Service providers;

- Activities and Events; and
- educational videos for Social Media

## 2. Fee-For-Service Contracts

The Division works with a statewide network of more than 150 Community Rehabilitation Providers (CRPs) to provide vocational rehabilitation services to individuals with disabilities. Each provider registers with the Division as a service provider and competes for the privilege to serve those in the community and deliver quality services to support individuals on their employment path. The Division recently converted its registration process to an online format so that it is more accessible and less administratively burdensome to providers.

### 1. The Division's Service Programs

The Tennessee Rehabilitation Center (Center) at Smyrna is a state operated comprehensive residential rehabilitation facility that serves individuals with significant disabilities. The Center is a member of the National Consortium of State Operated Comprehensive Rehabilitation Centers. An Advisory Council is utilized to provide valuable feedback used to help guide decision making in Center operations and program development.

On July 22, 2019, TRC - Smyrna transitioned from a program-based model to a new Career and Technical Education (CTE) design to enhance the overall service delivery process and better align the Center with the WIOA Primary Indicators of Performance in the areas of Credentialing and Skills Gains. As a result of the Center's transformation, students are no longer required to participate in a specific program with designated beginning and end dates. Students now choose an Area of Study with classes offered based on an individualized schedule. On a quarterly basis, students attend day and/or evening classes and can enroll in prerequisite, required, or elective classes based on their interests, skill development needs, and Area of Study requirements. All curriculums have been enriched to have a greater emphasis on work-based learning and community integration through required volunteer, practicum, and internship opportunities with business and industry. Upon completion of all courses, students receive a certificate of completion and have the option to take an exam to receive a national credential in their Area of Study.

TRC Smyrna offers 9 Areas of Study that provide opportunities to obtain national certifications and licenses that are industry-recognized, portable, and/or stackable. Additionally, students can enroll in an Entrepreneurship Area of Study to learn how to start and operate their own business after obtaining their certification. The Center is completing the final year of a 3-year strategic plan that includes objectives and action steps to improve access to and increase enrollment in apprenticeship programs and is currently working with one of its national partners, CVS, to develop pre-apprentice programs that could lead to registered apprenticeship certificates for TRC students. The following provides a brief overview of the Areas of Study and associated credentials where applicable.

### **Automotive Detailing Technician**

The Automotive Detailing Technician Area of Study prepares students for employment in the automotive services industry. Students are trained from the I-Car curriculum which includes courses in paint correction, buffing, polishing, and refinishing of body panels. Upon completion of all courses, students can obtain a nationally recognized credential in Auto Collision and Repair.

### **Automotive Maintenance & Lubrication Technician**

The Automotive Maintenance Area of Study prepares students for employment in Fast Lube Businesses, Automobile Dealerships, Rental Car Outlets, Large & Small Automobile Garages, Tire Companies, and Vehicle Manufacturers. The Automotive Service Excellence (ASE) curriculum is used to teach skills in oil and filter replacement, four-wheel alignments, wheel balancing services, brake service, repair tire servicing, and light engine and transmission work. Students may take an exam to obtain certification from the National Institute for Automotive Service Excellence (ASE) upon graduation.

### **Business Education Technology**

The Business Education Technology Area of Study introduces students to professional clerical and office opportunities. Students are trained in specific office tasks, office procedures, and skills positions in a broad range of clerical and office related positions, including receptionist, office clerk, secretary, and administrative assistant. Graduating students can obtain a national certification as a Microsoft Office Specialist and receive additional certifications through Office Proficiency Assessment & Certification (OPAC).

### **Certified Logistics Associate/Technician**

The Certified Logistics Associate/Technician Area of Study is designed to prepare students with skills and knowledge for a career in the logistics work environment. Students will be prepared for employment with companies that have implemented a team-oriented design, safety principles, lean principles, supply chain logistics, and sustainable practices within the manufacturing environment. Upon completion of this area, students will be able to explore job opportunities in this industry, including shipping and receiving clerk, conveyor work, and quality standards examination in warehouses and manufacturing plants. Students can obtain national certification as a Logistics Associate and an advanced Logistics Technician certification as a stackable credential through the Manufacturers Skills Standards Council (MSSC).

### **Certified Production Technician**

The Certified Production Technician area of study will offer students an introduction to Safety, Quality, Manufacturing Operations and Maintenance Awareness, as these topics relate to employment in the manufacturing industry. This credential will prepare students for positions in manufacturing including Production Helper, Production Technician, Machine Operator and Assembler. Students who demonstrate mastery of the core competencies of advanced manufacturing production can obtain credentials as a Certified Production Technician through the Manufacturers Skills Standards Council (MSSC).

## **Customer Care**

The Customer Care Area of Study trains students to obtain a position in a variety of customer service settings and jobs. Students will learn skills including product handling, stocking, ordering, inventory, money handling and operating point-of-sale equipment, creating displays, and customer service. This training will prepare students for positions in customer service, including call center representative, information clerk, customer service representative, and/or retail associate and greeter. Students who qualify can take the National Retail Federation Foundation Certification exam.

## **Food Service**

The Food Service Area of Study will offer students an introduction to the professional food service industry. Students will be introduced to workplace safety as well as sanitation & hygiene in a food service establishment. Upon completion in this area, students will be able to display skills applicable to this area such as safety, dining area work tasks, dishwashing operation, food identification, food preparation and bakery operations. Students can obtain the certification administered by the National Restaurant Association as a ServSafe Manager.

## **Power Equipment**

The Power Equipment Area of Study will introduce students to workplace and equipment safety on the Forklift, Stock Picker, and Power Pallet Jack. Upon completion of this Area of Study, students can obtain OSHA Forklift Certification and will be able to explore job opportunities in this industry including warehouses, lumber yards, manufacturing plants, farm supply stores, and food outlets.

## **Pharmacy Technician**

The Pharmacy Technician Area of Study trains students to assist licensed pharmacists in providing medication, medical devices or products, and customer service to patients. Pharmacy Technicians may also perform tasks related to preparing or compounding medications, communicating with physician offices or insurance companies, and other administrative pharmaceutical duties. Jobs can be found in retail, hospitals, mail order, and specialty pharmacies. Key skills gained include insurance verification, payment processing, inventory tracking, ordering, prescription filling, quality control, medical data entry, and coding. Upon completion of this Area of Study students can take the exam to become a Certified Pharmacy Technician (CPhT).

In addition, TRC Smyrna offers the following services to students as needed:

- Student Advisors: assist students in selecting courses in their Area of Study and preparing schedules each quarter.
- Community Training: assist in the development and assignment of internship opportunities with employers during the student's last quarter prior to graduation.

- Employment and Placement: assist students in identifying employment opportunities and applying for jobs in their home communities.
- Disability Services: assist students in obtaining needed accommodations for classroom instruction and employment, provides Orientation and Mobility Services, and prepares students for enrollment in the Tennessee Business Enterprise (TBE) program.
- Health Services: provides urgent medical care as needed through a Wellness Center staffed by nurses and offers physician and psychology services on a limited basis; offers health maintenance courses and behavior education for students and provides work conditioning and work hardening courses for students to prepare them for employment.
- Vocational Evaluation: assist students in identifying their interests, skills, and abilities through a series of educational, hands-on, and work-based tests.

The Division also operates a network of 17 Community Tennessee Rehabilitation Centers (CTRCs) located across the state providing services to eligible individuals with significant disabilities who are seeking competitive integrated employment. The CTCRCs are supported by a combination of appropriated local and Federal funds.

The CTCRCs deliver comprehensive vocational evaluation services that provide an individualized, timely and systematic process for identifying viable vocational options and developing employment goals and objectives. An accredited comprehensive vocational evaluation service is used to examine a wide range of employment options or alternatives using the following techniques:

- Assessment of functional/occupational performance in real or simulated environments
- Psychometric testing
- Preference and interest inventories
- Personality testing
- Extensive personal interviews
- Other appropriate evaluation tests depending on the individual
- Analysis of prior work experience, education, and transferable skills

Additionally, the CTCRCs offer Employee Development Services. Services are based upon individual needs and can include comprehensive employment services or any individual component. These services include:

- Employee development services and/or job readiness instruction
- Work skills development

- Community Employment Services
- Job readiness assessment and instruction includes: interview skills instruction, completing a job application, developing a resume, grooming and hygiene for the work place, self-determination training, developing and using job-finding networks and resources, communication skills, organizational skills, accommodations, and workplace safety.
- Job development and placement into competitive employment through the identification of employment opportunities in the local job market
- Development of realistic employment goals
- Establishment of service plans to achieve employment outcomes
- Identification of resources to achieve and maintain employment

The Division's Grant, Fee-For-Service Contracts, and Facility Programs are used to provide needed services such as but not limited to:

- Vocational evaluation
- Personal and vocational adjustment training
- Vocational training
- Job readiness training
- Job development and job placement
- Supported employment
- Rehabilitation technology
- Orientation and mobility
- Independent Living services
- Activities of daily living
- Trial work experiences
- Pre-Employment Transition Services

The VR Program is continuously seeking new partnerships with businesses and nonprofit organizations within the community to help develop, promote, and employ individuals with disabilities and transform the lives of Tennesseans.

## f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

The Division has interagency arrangements and coordination with the following entities for the provision of supported employment services and extended services:

1. The Department of Intellectual and Developmental Disabilities refers individuals with intellectual and developmental disabilities (DIDD) to the Vocational Rehabilitation program for Supported Employment Services.
2. The Department of Mental Health and Substance Abuse Services (TDMHSAS) works with the Division to employ an evidence based Individual Placement and Support (IPS) model of supported employment for individuals with mental illness and substance related disorders.
3. The Tennessee Employment Consortium, which is an independent association of community rehabilitation providers and state agencies developed jointly by the Division, the Department of Intellectual and Developmental Disabilities, and the Tennessee Council on Developmental Disabilities, was established to provide a forum for all stakeholders to review and discuss state policies and share best practices.
4. University of Tennessee, Center for Literacy Education and Employment provides staff training, professional development, and consultation services for community supported employment service providers.
5. Tennessee Department of Labor and Workforce Development works with the Division to share and report all employer related activities provided under the Workforce Innovation and Opportunity Act, which also requires services be provided to numerous target groups that have barriers to employment, including persons with disabilities and employers who hire these individuals. The Division is exploring ways to further its partnership with the Tennessee Department of Labor and Workforce Development to provide customized employment services through their system of Career Centers on behalf of VR clients, business and industry.
6. Tennessee Division of Health Care Finance and Administration, Division of TennCare (TennCare) partners with the Division for the provision of Supported Employment services for individuals enrolled in Employment and Community First CHOICES. ECF CHOICES serves individuals with intellectual and developmental disabilities who are receiving home and community-based programs under the Medicaid Long Term Support Services.
7. The Tennessee Department of Education (DOE) for the provision of Pre-Employment Transition Services, transition services, and other VR services provided by VR to students with disabilities in order to support an efficient transition from secondary school to post-school employment and related activities leading to competitive integrated employment.
8. The Division is a party to the Interagency agreement between DOE, DIDD, the Tennessee Department of Health, TDMHSAS, the Tennessee Department of Correction, and TennCare to fulfill the requirements of Part B and Part C of the Individuals with Disabilities Education Act (IDEA). The partner agencies strive to ensure that individuals and youth with disabilities are prepared for competitive integrated employment with access to necessary support services.

The Division has encouraged the establishment and development of Community Rehabilitation Providers (CRPs) to improve and expand services through grant and fee-for-service contracts in a joint effort of improving and expanding supported employment and extended services for individuals with disabilities. The Division currently has 87 active registered CRPs for supported employment services. The Division continues its' efforts to increase Supported Employment service providers and anticipates the numbers of providers will increase. VR is actively pursuing several other providers for underserved areas across the state.

## g. Coordination with Employers

Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

### 1. VR Services; and

The Vocational Rehabilitation Business Service Unit (BSU) works with employers to promote competitive integrated work opportunities and career exploration for customers through job search and placement services, combined service provision with WIOA core partners and stakeholders, and facilitation of work-based learning opportunities and employer-based training and employment programming. VR customers can work with a Business Employment Consultant (BEC) from the BSU to explore career opportunities aligning with their occupational goals and desired geographical location of residence. Together, the BEC and VR customer can search for local employment opportunities of interest, apply for opportunities, conduct interview preparation, and execute final placement. The success of BECs is measured by their successful service delivery to enhance competitive integrated employment outcomes for customers.

The BSU is striving to accurately align its service delivery model to meet the present and future needs of its dual-customers, Tennessee employers and individuals with disabilities leveraging VR services to attain their career goals. To do that, the BSU has transformed its BEC position into a customer-centered, solutions-focused consulting position. In this model, customers needing the services of a BEC work with either a Business Solutions Partner or Talent Solutions Partner to develop their customer-centered solutions strategy. Business Solutions Partners provide services directly to the business community, focusing on the needs of Tennessee employers, large and small. As employers across the state seek to recruit and retain individuals with disabilities, the Business Solutions Partner is a resource for consultation and assistance regarding services such as: Work Opportunity Tax Credit, Person-Centered Trainings, Workplace Accessibility, Workplace Accommodations, and more. If a Tennessee employer is facing a challenge regarding the recruitment and retention of individuals with disabilities to their workforce, a Business Solutions Partner will assist in developing customer-centered solutions for that business.

As Business Solutions Partners provide services directly to the business customer, Talent Solutions Partners serve as the primary consultant for individuals with disabilities receiving VR services who are actively seeking integration into the competitive workforce. VR counselors leverage the services of a Talent Solutions Partner to serve as a primary consultant to individuals. Talent Solutions Partners provide customer-centered services such as: Resume Development, Interview Assistance, Job Search, Application, Placement Assistance, and more. Talent Solutions Partners and Business Solutions Partners work as a team in order to ensure the needs of customers, employers seeking talent, and talent seeking employment, are met through a seamless delivery of services.

Vocational Rehabilitation's Business Service Unit works with partners from state agencies such as the Department of Intellectual and Developmental Disabilities, Department of Labor and Workforce Development, Department of Economic and Community Development, and Department of Corrections to align efforts in serving business customers and agency customers. Through participation in the Department of Labor and Workforce Development's local Business Service Teams, the VR Business Service Unit's BECs provide education and outreach services to employers offering competitive integrated work environments, enabling VR customers to have an expanded horizon of opportunity with Tennessee employers. Last, the VR BSU is leveraged for developing work-based learning sites across the state to promote career exploration for individuals with disabilities receiving services through the Division. Employer-based training and employment programs across the state enable customers to engage in meaningful work in a variety of industries through an integrated setting where compensation and benefit eligibility for full-time employees is competitive with the local labor market and equally available for VR customers.

The Tennessee Rehabilitation Center (TRC) – Smyrna continues to develop new partnerships and maintains the relationships with its current partners. This ensures that a work-based training experience is available for students in all Areas of Study. The Center currently has 25 agreements with employers to provide internship opportunities and new agreements are being signed on a regular basis. TRC Smyrna continues to offer customized training in partnership with Schwan Cosmetics and CVS Health and maintains a Business Employment Consultant on campus to assist students in job placement upon graduation. To ensure a greater focus is placed on building employer relationships in the future, a position at TRC Smyrna was designated in July 2019 to develop new internship opportunities to meet the needs of the increasing student enrollment. This position also conducts follow up to ensure that students are applying skills learned and employers are evaluating the students and the overall internship process. In addition, employers interested in offering internships and/or employment to TRC students are always invited to tour the campus, meet the instructors, and observe classroom instruction prior to signing a partnership agreement.

As part of a 3-year strategic planning process, a survey was conducted using face-to-face interviews with all partner employers and several non-participating employers in Rutherford County. The employers provided valuable input regarding the courses that best suit their needs, skills students must be able to demonstrate for success in their company, and industry credentials that would better prepare students for employment. The respondents also indicated that the existing 2-week internship did not provide ample time for students to apply all they've learned or allow the employers to fully evaluate their newly developed skills. It was recommended that both the length of the internships and hours per day on site be extended. To address the employers' recommendations, new courses were created, national credentials were included in all Areas of Study, and all internships were extended to 10 weeks during year 2 of the planning process. TRC Smyrna will continue to conduct these in-person surveys to assist in ongoing planning and program development during the final year of the Center's Strategic Plan.

Seventeen community TRCs (CTRCs) strategically located throughout the state provide opportunities for engagement with business to identify competitive integrated employment and career exploration opportunities unique to the local communities where the centers are located. CTRC services include vocational evaluation, situational assessments, training, and job readiness classes to prepare individuals for employment. CTRC staff engage with local business to educate on the benefits of

hiring people with disabilities, the services available by the center, and to secure training opportunities for VR customers. As the CTRCs move from facility-based training to community-based training, there are additional opportunities to engage with business which include internships, externships, tours to teach customers about local employers and the skills needed for their jobs, job shadowing and mentoring. Additionally, each CTRC has a local Advisory Board which consists of members of the local community (business leaders, representatives from the local education agency, civic leaders, non-profit members etc.) The center managers can leverage these relationships to spread the word about VR, and the training and support services available in the CTRCs that lead to competitive integrated employment for VR customers.

## 2. Transition services, including pre-employment transition services, for students and youth with disabilities.

As noted above, the Division is working with employers to provide transition services, including pre-employment transition services for students and youth with disabilities. In addition to the work done through coordination with community rehabilitation providers, the division works with employers through its partnership with the Business Services Unit, which helps Pre-ETS staff and students coordinate with employers by utilizing business relationships that the Business Solutions Partners have developed in order to achieve specific goals reliant on partnerships with the business community. Business Solutions Partners serve as a liaison for the Pre-ETS teams as they seek to identify opportunities with the business community such as: Career-Exploration Initiatives, Work-Based Learning Opportunities, Community-Based Training Opportunities, business representation on local and state advisory boards, and more. Business Solutions Partners serve as a resource for the VR team to access the opportunities that exist within the business community for serving youth and adults with disabilities at varying stages of their customer journey to long-term competitive integrated employment.

As previously mentioned, the Division works with employers through Transition School to Work grants, and the Project SEARCH® sites. In partnership with ten local education agencies and the Council on Developmental Disabilities, the Division operates 13 High School Transition Project SEARCH® Sites through local employers. Those employers include:

1. BlueCross BlueShield – Hamilton County Schools
2. Embassy Suites – Rutherford County Schools
3. Embassy Suites – Metro Nashville Public Schools
4. Le Bonheur Children’s Hospital – Shelby County Schools
5. Maryville College – Blount County Schools
6. Methodist North Hospital – Shelby County Schools
7. Parkwest Medical Center – Knox County Schools
8. Sheraton Hotel – Shelby County Schools
9. Tennova – Clarksville-Montgomery County Schools
10. The Peabody – Shelby County Schools

11. Welch College – Sumner County Schools
12. West TN Healthcare – Jackson-Madison County Schools
13. Wilderness in the Smokies – Sevier County Schools

Since September 2015, a total of 307 students have enrolled in the Project SEARCH® Program. The Project SEARCH® Program has a success rate of 91%, with 278 out of 307 students completing the program in Tennessee to date. Tennessee currently has 9 Community Rehabilitation Providers participating as Project SEARCH® Providers. The program operates from 17 different business sites across Tennessee and currently has 80 interns participating in the program. Since September 2015, the program has seen a 12% participation increase. Project SEARCH® has proven to be one of TN VR's more successful job training programs.

## **h. Interagency Cooperation**

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

### **1. The State Medicaid plan under title XIX of the Social Security Act;**

As noted in the previous sections, the Division maintains memoranda of understanding (MOU) with each of the state agencies listed above.

The Division's MOU with the State Medicaid Agency, TennCare outlines the coordination of the provision of services for individuals enrolled in Employment and Community First CHOICES. ECF CHOICES serves individuals with intellectual and developmental disabilities who are receiving home and community-based programs under Medicaid Long Term Services and Supports. Beginning in July 2016, Tennessee, through the ECF CHOICES program, became the first state in the country to develop and implement an integrated, home and community-based services program, aligning incentives toward promoting and supporting integrated, competitive employment and independent living as the first and preferred option for individuals with intellectual and developmental disabilities.

The Division's MOU with DIDD governs the referral individuals with intellectual and developmental disabilities (DIDD) to the Vocational Rehabilitation program. The Division is currently reviewing this agreement in anticipation of new employment service options for DIDD participants being served under the 1915(c) waiver authority that are being added in 2020. This will require increased coordination and collaboration between the two agencies to ensure a seamless transition of individuals from one payer source to another and eliminate service gaps or the potential duplication of services.

The Division's MOU with TDMHSAS works with the Division to employ an evidence based Individual Placement and Support (IPS) model of supported employment for individuals with mental illness and substance related disorders. IPS has become a promising SE program for individuals with mental

illness who may also have other diagnoses. As noted in other sections of the plan the Division is expanding its partnership with TDMHSAS to serve even more individuals in the coming years.

In addition to the individual MOUs with each of the state agencies, Tennessee is an Employment First State. The state operates an active Employment First Task force that includes all the agencies listed above and several others. The Employment First Taskforce's mission is to create and expand employment opportunities for all Tennesseans with disabilities and its vision is that people with disabilities have equal access to employment opportunities. The goals of the taskforce are to:

1. Align service delivery systems and strengthen coordination to increase employment opportunities for Tennesseans with disabilities
2. Build shared community commitment to Employment First
3. Increase the number of employers that hire people with disabilities
4. Make Tennessee state government a model employer of people with disabilities
5. Prepare students for employment and post-secondary success

## 2. The State agency responsible for providing services for individuals with developmental disabilities; and

Response provided in section h.1 above.

## 3. The State agency responsible for providing mental health services.

Response provided in section h.1 above.

## i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

### 1. System on Personnel and Personnel Development

#### A. Qualified Personnel Needs

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

In order to serve the nearly 14,000 individuals expected to seek and/or receive VR services in PY19, the Division currently employs 441 staff. Of these 441 staff members, 157 provide direct client services. These positions are broken down by job category and position classification in the table below.

Job Category	Job Classifications	Current # of Staff Employed
Administrative	Program Director, Rehab Superintendent, Accounting Technician	20
Clerical	Administrative Assistant, Secretary, Office Supervisor	68
Rehabilitation Assistants	Rehabilitation Assistant	44
Supervisors	Field Supervisor, Program Manager	50
Support	Building Maintenance, Custodial Worker, Program Coordinator, Program Specialist, Security Guard, Information Resource & Support Specialist, Orientation & Mobility Specialist, Vocational Rehabilitation Safety Coordinator	31
Instructor	Rehabilitation Instructor, Vocational Instructor	36
VR Direct Client Services	Vocational Rehabilitation Counselor Masters, Pre-Employment Transition Specialist, Rehabilitation Training Center Manager, Vocational Rehabilitation Case Manager, Vocational Rehabilitation Evaluator	157
Medical	Licensed Practical Nurse, Nurse's Assistant, Occupational Therapy Assistant, Physical Therapist, Psychological Examiner, Psychologist, Recreation Therapist, Registered Nurse	20
BEP Specialist/Consultant	Business Employment Consultant, Business Employment Specialist, Business Employment Supervisor	15

ii. The number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

The Division currently has 550 allocated positions. Of these 550 positions, 109 are currently vacant (19.81%). Out of the 550 allocated positions, 202 positions provide direct client services. 45 of the direct client services positions are currently vacant. These allocated positions reflect the estimated number of personnel needed by TN VR to provide services. The table below provides a breakdown by job category and indicates the current number of vacancies.

Job Category	# of Positions Allocated & Needed	Current # of Vacancies
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Job Category	# of Positions Allocated & Needed	Current # of Vacancies
Administrative	21	1
Clerical	87	19
Rehabilitation Assistants	60	16
Supervisors	57	7
Support	36	5
Instructor	45	9
VR Direct Client Services	202	45
Medical	27	7
BEP Specialist/Consultant	15	0

The Division currently anticipates needing the same number of positions in each of the above job categories in order to adequately provide services to those individuals needing services across the state. Additionally, the Division is in a period of transformation, identifying areas where we can better utilize staff and resources to make service delivery more efficient and effective for both VR participants and staff.

iii. Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Response provided in section i.1.A.i. above.

## B. Personnel Development

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

In Tennessee, the University of Memphis, located in Memphis, TN is the only school that has the Council on Rehabilitation Education (CORE) certified program offering a master's degree in Rehabilitation Counseling.

The Master's Degree in Rehabilitation Counseling program at the University of Tennessee located in Knoxville, TN ended in 2018.

ii. The number of students enrolled at each of those institutions, broken down by type of program; and

The University of Memphis currently has 26 graduate students in their program. Of these students seventeen (17) are sponsored by RSA. None of these students are employed by the Division. Of the 26 graduate students, fifteen (15) are from underrepresented groups (racial or ethnic minority) and two (2) identified themselves as white with a disability.

Two (2) Masters VR Counselors plan to enroll in graduate courses for 2020. One on-campus at the University of Memphis for Spring 2020 and one on-line at the University of Buffalo for Fall 2020.

iii. The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

Institutions	Students Enrolled as of November 2019	Employees sponsored by agency and/or RSA	Graduates sponsored by agency and /or RSA	Graduates from the previous year
University of Memphis	26 (9 entered 18-19 SY and sponsored by RSA) (8 entered 19-20 SY and sponsored by RSA)	0	3 (18-19 SY)	4

(Note: Data provided in the table is for students enrolled as of the fall semester 2019. Therefore, the employee expected to enroll in the Spring of 2020 is not reported in this table.)

Four (4) individuals graduated from the University of Memphis with a master's degree in Rehabilitation Counseling the previous year (17-18 SY). One graduate from the 17-18 SY is employed by the Division.

The Division evaluates new employees to determine training needs in order to sit for the Commission on Rehabilitation Counselor Certification (CRCC) Certified Rehabilitation Counselor (CRC) exam.

The Division currently has four (4) Masters VR Counselors enrolled in on-line courses at Utah State University in order to meet CRCC's requirements to sit for the CRC exam.

The Division currently has 34 Masters VR Counselors who require additional courses in order to meet CRCC's requirements to sit for the CRC exam. The Division is working with these Counselors to locate and arrange for schools to meet the course requirements.

The Division currently has 37 Masters VR Counselors who have completed all requirements to sit for the CRC exam.

The Division currently has 18 Masters VR Counselors who hold CRC certification.

## 2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

The Department of Human Services created an Office of Talent Management – Learning & Development in January 2016 which has shared responsibility with the DHS division of Human Resources for talent acquisition. Recent progress includes the development of a market appropriate standard job posting template and significant expansion of our recruiting and advertising sources, such as online job boards, social media and industry-specific sites for executive service positions and hard to fill preferred service jobs. This process also provides support to hiring managers to ensure job postings accurately reflect relevant duties and responsibilities and language that will attract both active and passive job seekers. The Talent Management team is currently developing recruiting process learning modules for managers to further enhance the ability to select and retain superior talent.

The Office of Talent Management – Learning & Development is establishing a dedicated recruiting team in 2020, which will further improve the agency's ability to attract and retain talent at all levels of the organization with additional capability to support managers during the recruitment and selection process. The organization also conducts consistent employee engagement surveys to determine levels of satisfaction and opportunities for organizational solutions to address employee retention.

In 2020, the State of Tennessee will implement an applicant tracking system that will improve agency market presence, position the organization as an employer of choice and improve the division's ability to attract high caliber talent. The Division remains diligent in retention strategies for qualified staff. VR Counselors are given opportunities to attend conferences, trainings, and events in recognition of their work, dedication and commitment to assisting individuals with disabilities in achieving their employment goals. To aid in recruitment activities, the Division ensures that institutes of higher learning who provide master's degree programs in the field of rehabilitation counseling as well as professional organizations such as CSAVR and NCSAB are aware of employment opportunities for vocational rehabilitation counselors which includes individuals with disabilities and individuals who are minorities.

As noted in previous sections, Talent Management is a strategic priority for the Division. Over the next four years, the Division of Rehabilitation Services is committed to ensuring that the VR program is staffed appropriately to deliver much needed services to the citizens of Tennessee, as well as ensuring that our staff have the resources and support that they need to perform their job duties effectively and efficiently. Through our actions, we are aiming to:

- Advance a culture of high performance through professional development and accountability;
- Recruit, develop, retain and recognize quality employees and equip them to deliver high quality service through continuous coaching and training; and

- Sustain efforts through staff retention and thoughtful succession planning.

The Division of Rehabilitation Services is currently assessing and evaluating the Division's staffing to include a review of position classification and compensation for alignment with the roles and responsibilities of a modernized, community-based vocational rehabilitation program. As part of this review, the Division is looking at the possibility of creating an entry-level non Master's level staff position to assist our Master's level Counselors with their workload. We believe this would attract individuals who are interested in the field of vocational rehabilitation and help to create a talent pipeline to the Counselor position or other positions within the Division.

Additionally, Division leadership is in the middle of an internal evaluation of the Division's approach to professional development including an update and re-design of new counselor training, general staff on-boarding and other professional development opportunities for staff on an ongoing basis. These efforts will be ongoing in PYs 20 and 21.

In 2018, the State of Tennessee created an internship program – the Tennessee Leaders of Tomorrow Internship Program- to provide practical work experience while growing future leaders in Tennessee. This is an 8-week program that provides interns with the opportunity to gain a better understanding of state government as well as gain important job skills and can serve as a potential talent pool for the division.

The cumulative outcomes of the efforts mentioned will significantly support improved customer interactions and outcomes.

### 3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

**A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and**

All VR Counselor positions are filled at the master's degree level. The CSPD requirement in Tennessee is eligibility to sit for the Certified Rehabilitation Counselor (C.R.C.) exam. When new staff are hired at the master's degree level, if they do not meet the CSPD at the time of hire, they have 36 months to meet the requirements.

**B. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.**

As stated above, VR Counselors are required to have a master's degree and be able to qualify to sit for the CRC exam. If they do not meet the CSPD at the time of hire, they have 36 months to meet the requirement. Onboarding for new staff involves meeting in person or online with leadership, community rehabilitation providers in their area and their local American Job Centers (AJCs), as well as the directors from programs such as Business Services, Transition, Policy, Contracts and Assistive Technology. Initial on-boarding occurs immediately with the new hire and their immediate supervisor.

The Division's New Counselor Institute is a six (6) week blended learning opportunity that combines traditional classroom instruction with independent distance learning, hands-on application, job shadowing, and observation. New Counselor Institute is offered several times a year based on actual hiring needs.

In addition to the formal instruction offered as part on-boarding and hiring, training is offered regularly through unit and regional meetings. The division's Policy Specialists attend regional meetings at least quarterly to provide policy updates and other training opportunities. VR Counselors and Supervisors are encouraged to request ad hoc training as areas of interest or advances are identified. Policy Specialists also conduct webinars and record other on-line training opportunities for VR staff to maintain current knowledge on best practices. The Division contracts with the VR Development Group (VRDG) to provide a variety of online module trainings including disability specific topics, ethics, and other topics relevant to the field of rehabilitation. The Business Services Unit provides information at quarterly regional meetings pertaining to labor force needs and the needs of individuals with disabilities entering employment. The Division also works closely with the AJCs and DOL to ensure accurate, up-to-date information is shared with staff.

An annual training event for staff is the ResourceABILITY Fair held each October in conjunction with disability employment awareness month. This event is hosted in partnership with the state's AT Act Program, the Tennessee Technology Access Program (TTAP), and includes training, product demonstrations by AT vendors, highlights of VR success stories, and networking with employers.

## 4. Staff Development

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. A system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

The Department of Human Services (DHS) Office of Talent Management-Learning & Development (TMLD) provides focused support driven by agency strategy to ensure organizational ability to attract, recruit, select, develop, engage and retain staff throughout the employee life cycle. The agency has made significant investments in the development of its Talent in building and developing organizational capacity to meet current and future business and customer needs.

The Office of Talent Management-Learning & Development provides staff development, leadership development and training for DHS employees. DHS has invested an average of 45 hours of learning

per employee annually. TMLD works in a consultative manner with Rehabilitation Services to determine learning, skill development and relevant competency-based needs of the division. Training needs are identified through a variety of channels including program and policy updates, advances in research and best practice, individual performance evaluations, quality assurance reviews and overall program performance metrics. TMLD has dedicated staff to provide support for Rehabilitation Services and works in conjunction with the Rehabilitation Services division in the development of training necessary to ensure effective, outcome driven results. The team works consistently to provide standard learning opportunities to support effective service delivery.

In working with the Division of Rehabilitation Services leadership, when new learning needs are determined, the TMLD team has in-depth discussions and provides an assessment tool for leaders to provide feedback on the learning need, expected outcomes, and program impact. The team assesses this information, engages in additional exploratory conversations with leadership before creation of an outline for proposed learning. Once an outline has been approved by both field and divisional leadership, the TMLD team creates curriculum learning objectives and a proposed syllabus. With divisional endorsement, full curriculum development begins. The final curriculum is reviewed by the TMLD curriculum review team before divisional review. Once completed final review and revisions are provided by Rehabilitation Services. The TMLD Design team provides learning design ideas that drive innovation and lend themselves to an improved learning experience for DHS employees. Each Rehabilitation Services employee can evaluate each learning opportunity and the survey results are used for ongoing curriculum improvement.

TMLD provides performance management support to all DHS employees in alignment with the goals and priorities established by the Governor and the Commissioner of DHS. During 2019-2020 and beyond, refresher performance management training will be provided to managers and employees to ensure an accurate and consistent performance management process.

#### **TMLD learning strategies:**

TMLD provides one director and two program specialists assigned to the Rehabilitation Services division. However, the program has access to additional TMLD resources when needed. The TMLD/VR training team has a key objective of facilitating learning around policy, culture, job responsibilities and systems knowledge. Each assigned facilitator can support all aspects of VR learning.

All new counselors are expected to participate in New Counselor Training. To support this objective, TMLD is currently revamping the NCI training to meet the needs of the program's transformation and culture development goals. During this period of evaluation and development, the TMLD team is currently in the process of determining proposed creative solutions for development for new counselors and staff until the final curriculum is implemented. The TMLD team is always available for on-demand training, development and support (i.e. coaching, facilitating teams through transformation and change readiness).

The Edison Enterprise Learning Management (ELM) is in place and allows documenting available courses, learner enrollment, and learner overall participation in various classes. Each learner has a “My Learning” page that documents all sessions of training (classroom or online) attended and completed. The system also allows for cumulative or individual reporting on various aspects of learning completed for the division and the agency.

In addition to the training offered by the Division, the VR Program contracted for online course system offered by the VR Development Group (VRDG). All courses are designed for the field of VR. VRDG is the only organization offering accessible, interactive multimedia courses in the VR field. VRDG information is continuously updated and includes changes from WIOA and the CRC Code of Ethics. Course topics include: Effectively Managing VR Caseloads, Autism Spectrum Disorders and Employment, Introduction to VR, Comprehensive Assessment, and Job Development and Employment Acquisition (to name a few). These trainings are available 24/7. Supervisors choose the sessions for their staff. At the end of each session there is a quiz to check for learning and comprehension.

## **B. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.**

TN VR is a member of several national and state professional organizations and associations including the Council of State Administrators of Vocational Rehabilitation (CSAVR) and the National Council of State Administrator for the Blind (NCSAB). In addition to participation as a state, many of our staff maintain individual memberships in professional organizations and associations. These memberships provide access to a network of professionals across the state and nationwide that regularly distribute research and resources on best practices and advances in the field through conferences, training, listservs, and publications.

TN VR leverages the resources and expertise of the training and technical assistance provided to state VR agencies through the training and technical assistance centers funded by the Rehabilitation Services Administration including the National Technical Assistance Center on Transition (NTACT), Workforce Innovation Technical Assistance Center (WINTAC), Rehabilitation Training and Technical Assistance Center for Program Evaluation and Quality Assurance (PEQA), Vocational Rehabilitation Technical Assistance Center for Youth with Disabilities (Y-TAC), and the Job-Driven Vocational Rehabilitation Technical Assistance Center (JDVRTAC). TN VR staff receive email notifications of new research, resources, training and webinars and regularly participate in these opportunities. During federal fiscal year 2018, the Vocational Rehabilitation program’s Business Services Unit (BSU) participated in intensive technical assistance provided by the Job-Driven Vocational Rehabilitation Technical Assistance Center (JDVRTAC).

Staff have opportunities throughout the year to attend conferences and training relating to the field of vocational rehabilitation. Examples include the Tennessee Disability Mega Conference, ResourceABILITY Fair, Tennessee’s Passport to the Future sponsored by Vanderbilt University and Transition Tennessee. At the national and regional level, Tennessee regularly has a presence at CSAVR, NCSAB, PEQA, Project SEARCH, Individual Placement and Supports Learning Community, Get Aware Live, and Southeast Regional Institute on Deafness (SERID). The staff selected to attend these events are required to bring back information and present to their colleagues.

## **5. Personnel to Address Individual Communication Needs**

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

The Tennessee Department of Human Services (TDHS) will take reasonable steps to ensure that persons with Limited English Proficiency have meaningful access and an equal opportunity to inquire, apply for and participate in Agency-offered services, including VR services, activities, programs and other benefits. All interpreters, translators, and other aids needed to comply with this policy shall be provided without cost to the person seeking services.

The Division of Rehabilitation Services has policies and procedures to ensure that it includes among its personnel, or has readily available, the services of (1) Individuals able to communicate in the native languages of applicants and eligible individuals who have limited English proficiency through Avaza Language Services or Linguistica International; and (2) Individuals able to communicate with applicants or eligible individuals in appropriate modes of communication.

During staff orientation, New Counselor Training, annual Title VI training and other training activities, Division staff members are informed of specific procedures to be followed to ensure effective communication with limited English-speaking individuals. Telephonic translation services are available through Avaza Language Services or Linguistica International. The Tennessee Language Center is also available to translate documents as needed. All regions have received training for all staff in the use of these services.

The Division continues to recognize its responsibility for employing or obtaining the services of sign language interpreters, which fall within the definition of appropriate modes of communication in (34 CFR § 361.5(b) (5)), to the extent necessary to meet the communication needs of individuals who are Deaf, Hard of Hearing or Deaf-Blind. The Division's policy addresses the (1) significance of such services, (2) the selection of service providers, (3) the scheduling and payment for services, and (4) an evaluation process for such services.

## 6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

In 2015, the TDOE partnered with Vanderbilt University to create an online and in-person professional development system called Transition Tennessee ([www.transitiontn.org](http://www.transitiontn.org)). Transition Tennessee was originally intended to be a one-stop shop for educators to have immediate access to all things related to transition planning in the school system through an online portal. It began with an initial set of online professional development courses and expanded into establishing regional communities of practice, local technical assistance sites, monthly webcasts, and much more. The courses offered under the educator blueprint are:

- Guiding Principles

- Age-Appropriate Transition Assessments
- Developing a High-Quality Transition Plan
- Pathways to Employment
- Pathways to Community Life
- Pathways to Self-Determination
- Pathways to Postsecondary Education
- Supports and Partnerships

This new online resource was presented across the state to teachers, but also to vocational rehabilitation staff. To continue and expand the State's collective impact, VR also entered into a partnership with Transition Tennessee to create a Pre-ETS Blueprint portal that would also be housed on [www.transitionTN.org](http://www.transitionTN.org). As of Nov. 2019, there are two courses available within the Pre-ETS Blueprint and three more being developed.

- Power of Early Work Experiences (Complete)
- An Overview of WIOA and Pre-ETS (Complete)
- Building Interagency Collaboration
- The Student-Centered Approach to Instruction
- Connecting with Employers and Families

This partnership between the TDOE, VR, and Vanderbilt to create and expand Transition Tennessee has also resulted in hosting a pre-conference in addition to the TDOE's Partners in Education Conference. The pre-conference is called Passport to the Future and has reached capacity of 450 during the first two years and is expected to reach the 500-person capacity for January 2020. Passport to the Future brings together both education and VR staff for the sole purpose of improving the knowledge, skills, and abilities for the partners who help build a seamless pathway to postsecondary. More information about Passport to the Future can be found here: <https://transitiontn.org/vr/conference/>.

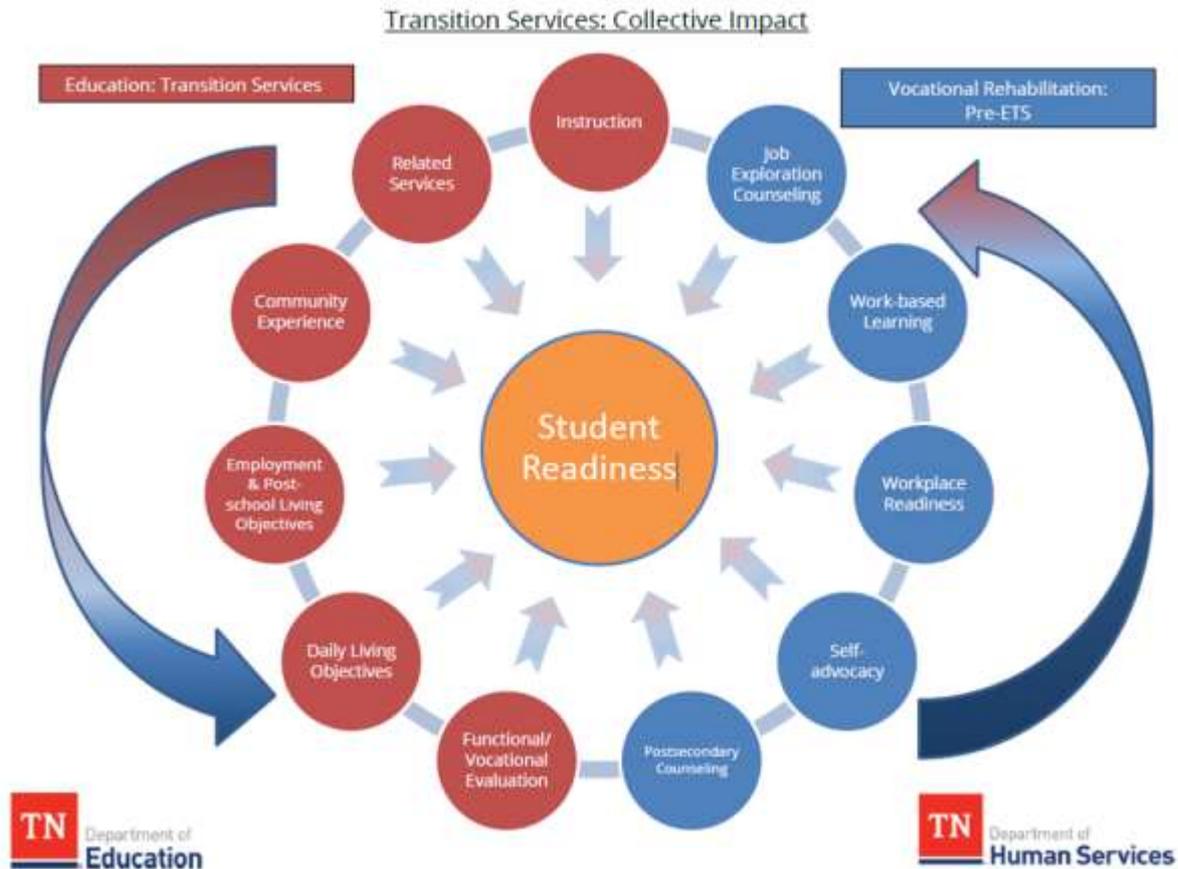


Figure 12: TN - VR Transition Services: Collective Impact

## j. Statewide Assessment

1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

A. With the most significant disabilities, including their need for supported employment services;

The Rehabilitation Act of 1973, as amended (Act) calls for periodic comprehensive statewide needs assessments to be conducted jointly by each state's vocational rehabilitation (VR) agency and State Rehabilitation Council (SRC) to inform the State Plan. The Act is specific regarding areas that a needs assessment should address. In addition to the overall need for rehabilitation services in the state, the Act focuses on several VR subpopulations and services: individuals with most significant disabilities, including those in need of supported employment; unserved and underserved individuals, including minorities; individuals served by other parts of the statewide workforce investment employment system; and establishment, development or improvement of community rehabilitation programs (CRPs).

In 2019, in collaboration with the State Rehabilitation Council and Transition TN, the vocational rehabilitation program conducted several assessments to capture a comprehensive picture of the state's needs. VR customers and their caregivers, Community Rehabilitation Providers (CRPs), VR staff, stakeholders, WIOA partners, Pre-ETS providers, educators and parents of students with disabilities all provided valuable feedback on the strengths and opportunities for vocational rehabilitation in Tennessee.

Trends that Tennessee are experiencing closely follow national trends related to assisting individuals with disabilities find employment opportunities in a competitive and integrated setting.

Overall, information collected in the 2019 needs assessment reveals that individuals who interact with the VR program believe that VR provides beneficial and much-needed services to Tennesseans who need it. However, that same information also illustrates that the program has opportunities to improve and strengthen service delivery, internal and external communication, and efforts to train and retain VR's most important asset – the staff that work day in and day out to help connect Tennesseans with disabilities to competitive and integrated employment opportunities.

The information that follows in this section highlights data collected in the assessment as it relates to the VR service needs of those with the most significant disabilities, including their need for supported employment services; those who are minorities; those who have been unserved or underserved by the VR program; those who have been served through other components of the statewide workforce development system; and those who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

As part of the CSNA, respondents across all surveys, other than the WIOA partners, were asked which VR services they believe most help individuals prepare for employment. Across the board, top choices included job readiness, job placement, and supported employment. Customers and caregivers ranked the option of "Other Services" highly, though as highlighted in the below figure, job placement assistance was the service that most respondents stated that they receive.

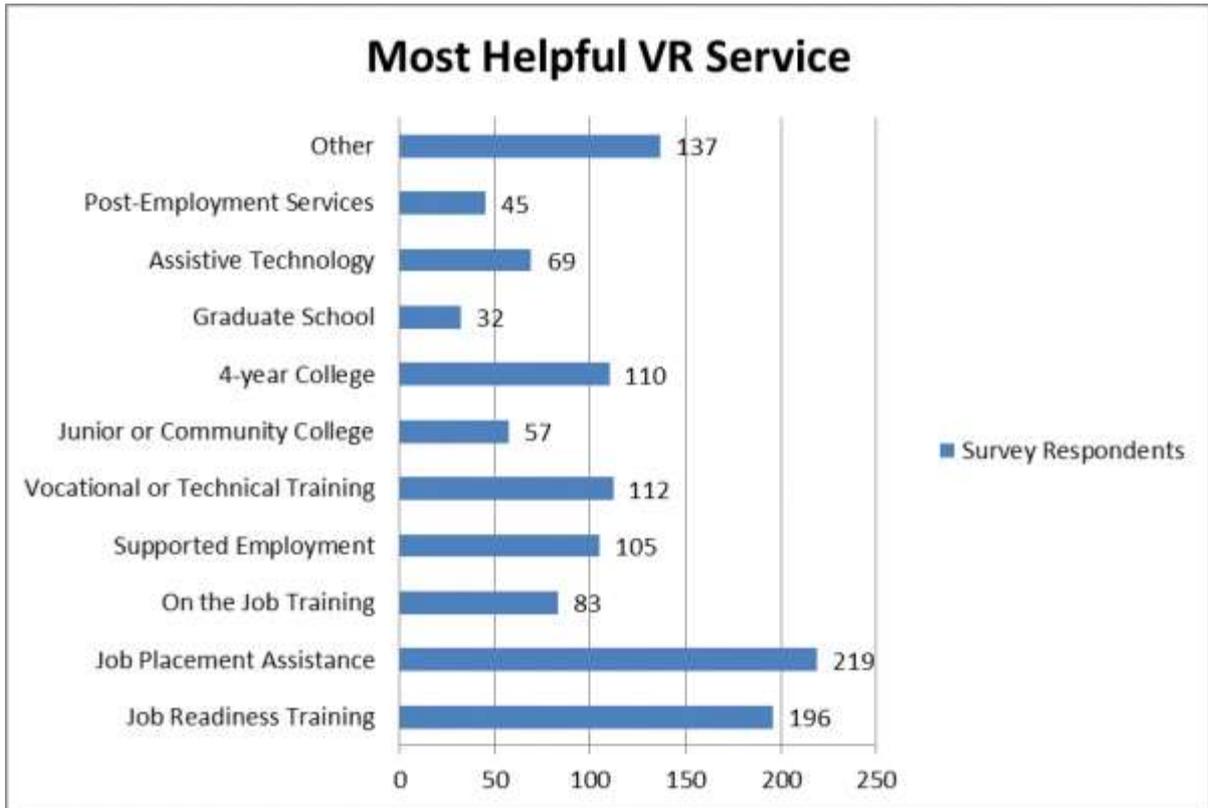


Figure 13: TN - Most Helpful VR Service

As the below figure depicts, regardless of service received, 65% of respondents to the VR Customers and Caregivers survey believed that the services offered by VR met their needs. However, as the bottom figure illustrates, there was a slight difference when respondents were asked if they believed that their participation in the VR program left them feeling more confident in their ability to work in the community. Only 60% of respondents agreed that they were more confident in their ability.

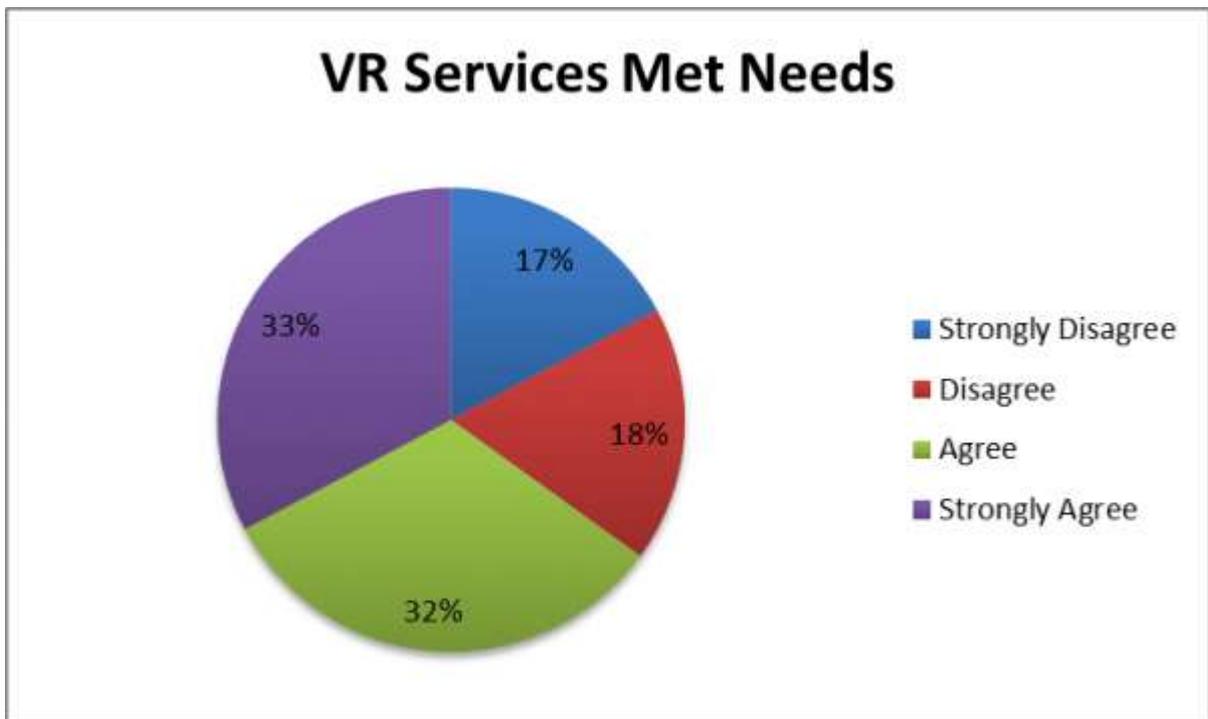


Figure 14: TN VR Services Met Needs

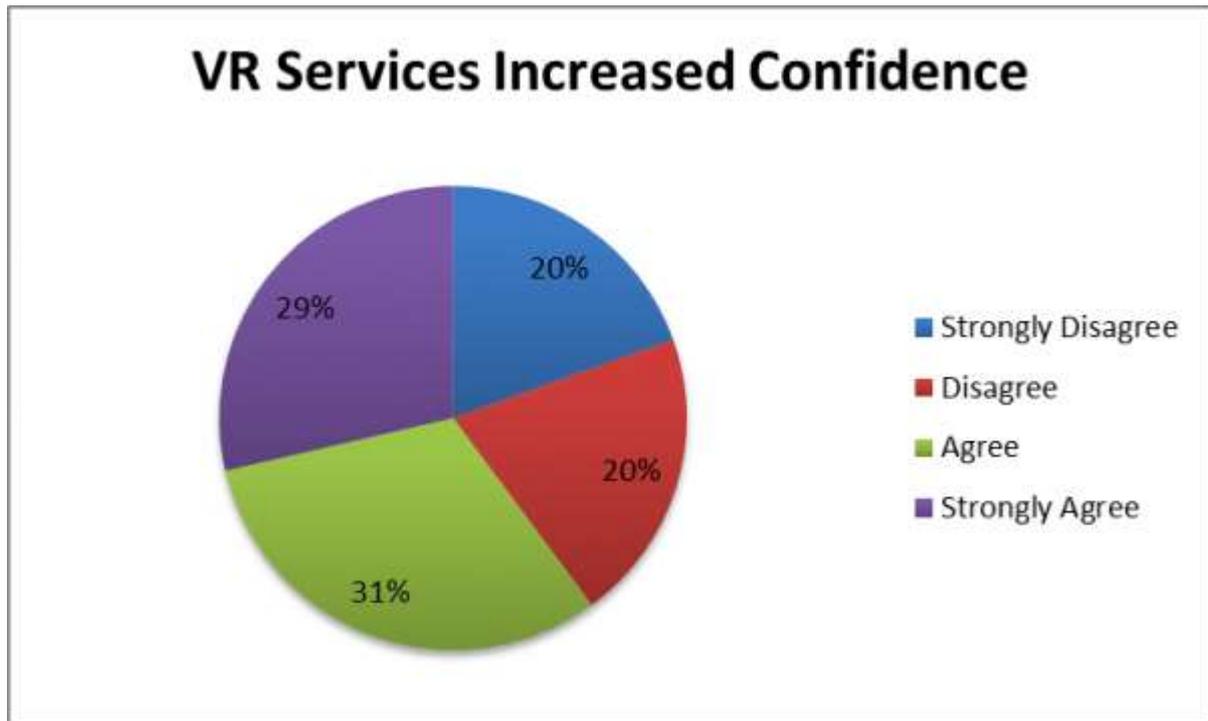


Figure 15: TN VR Services Increased Confidence

The CSNA used data obtained in the ACS five-year survey (2013-2017) to determine accurate information about the racial makeup of citizens in the state of Tennessee. Approximately 78% of Tennesseans identify as White, followed by approximately 17% of Tennesseans who identify as Black/African American. American Indian/Alaskan Native (AI/AN), Asian, Native Hawaiian/Other Pacific Islander (NH/PI), some other race, or a combination of multiple races rounds out the racial profiles of Tennesseans surveyed.

On a national level, data suggests that regardless of race, individuals with a disability are less likely to be employed. In 2017, Whites and Blacks/African Americans had a higher rate of disability than Asians or Hispanics. At the same time, regardless of disability status, Whites and Hispanics were more likely to be employed than Blacks and Asians.

In Tennessee in 2017, the prevalence of disability for working-age people (ages 21 to 64) when broken down by race found the following results: Individuals identifying as Native American reported the highest rate of disability (29.1%), followed by White (13.9%), Black/African American (13.7%), Some other race(s) (11.6%), and Asian (5.7%). This does not mean that these individuals were employed, but rather are of the age to participate in the labor force.

Tennessee state law requires the Division of Rehabilitation Services to submit a Title VI Implementation Plan to the Tennessee Human Rights Commission annually. In order to submit the plan, the division compiles racial and ethnic statistical data regarding the Vocational Rehabilitation

program. The tables in the below figures identify the number of active and closed cases, as well as the percentage of all cases they represent, broken down by race that VR assisted with over the last three years.

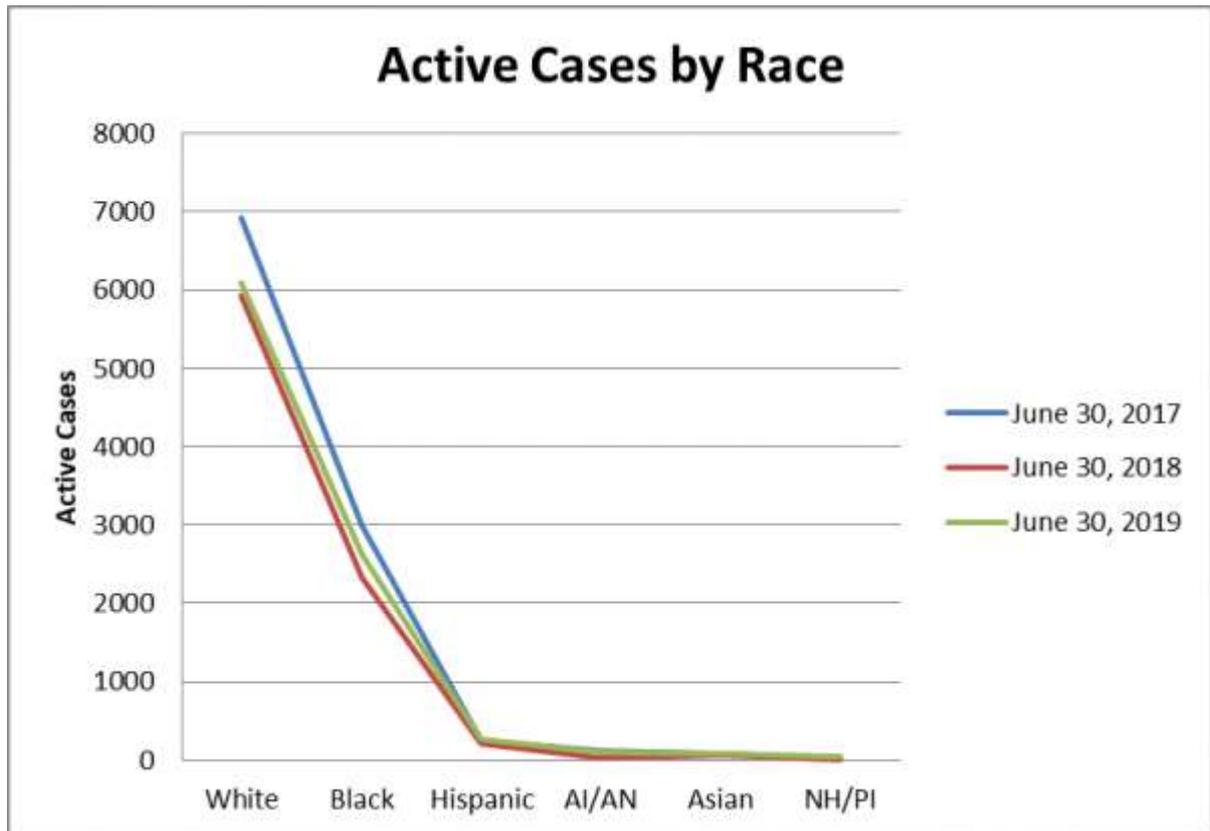


Figure 16: TN VR Cases By Race

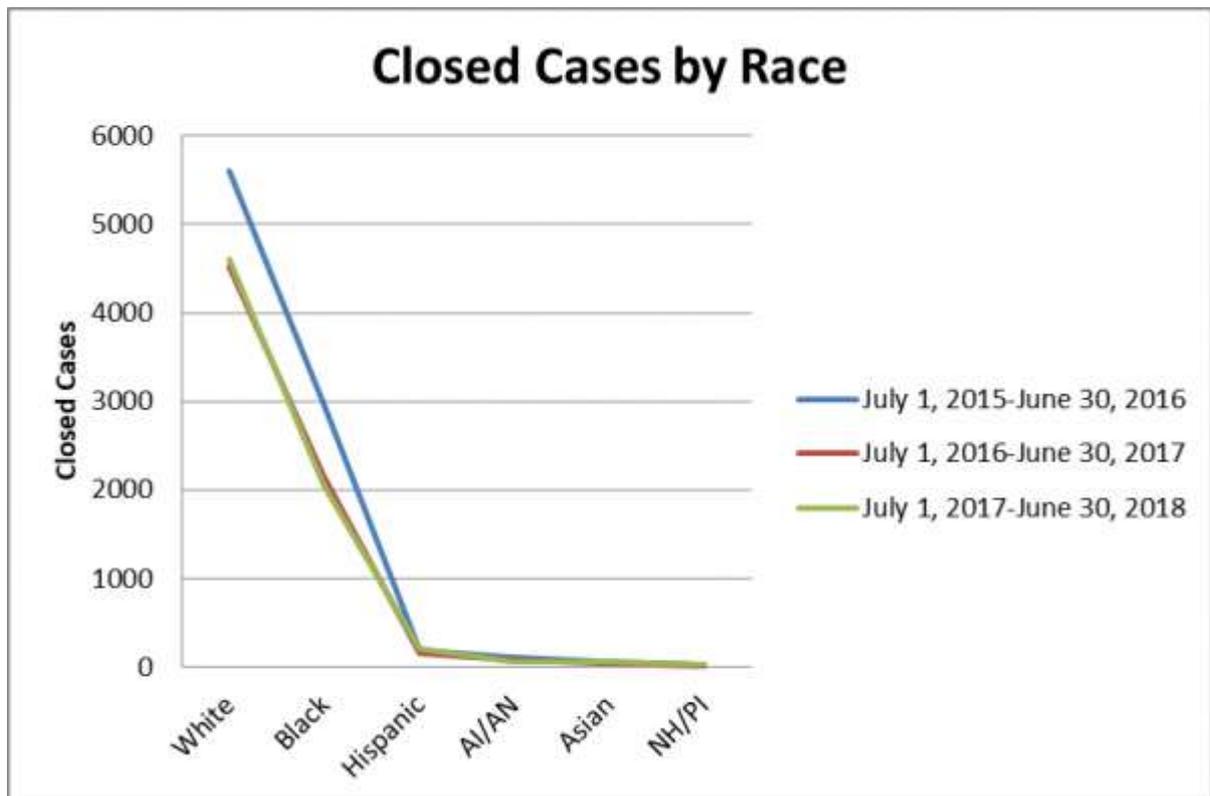


Figure 17: TN VR Closed Cases by Race

Moving beyond the racial and ethnic profiles of VR customers, the VR needs assessment identified certain populations thought to be chronically unserved and underserved by the VR program. The needs assessment provided respondents with examples of “unserved” (defined as individuals eligible for VR services, but have not yet received VR services) or “underserved” (defined as individuals that have not traditionally received equal access to benefits of VR services, such as racial or ethnic minorities) populations as defined by the Rehabilitation Services Administration (RSA), and asked them to identify whether they thought certain populations fit into either category. Additionally, respondents were asked to elaborate on what they believed to be the unmet needs of these groups and to identify ways that VR could reach out to these populations. Below is a summary of VR’s findings.

Overall, survey respondents identified immigrants, American Indian or Native American, Asian or Pacific Islander, and the Offender Reentry populations as those most “unserved” in Tennessee.

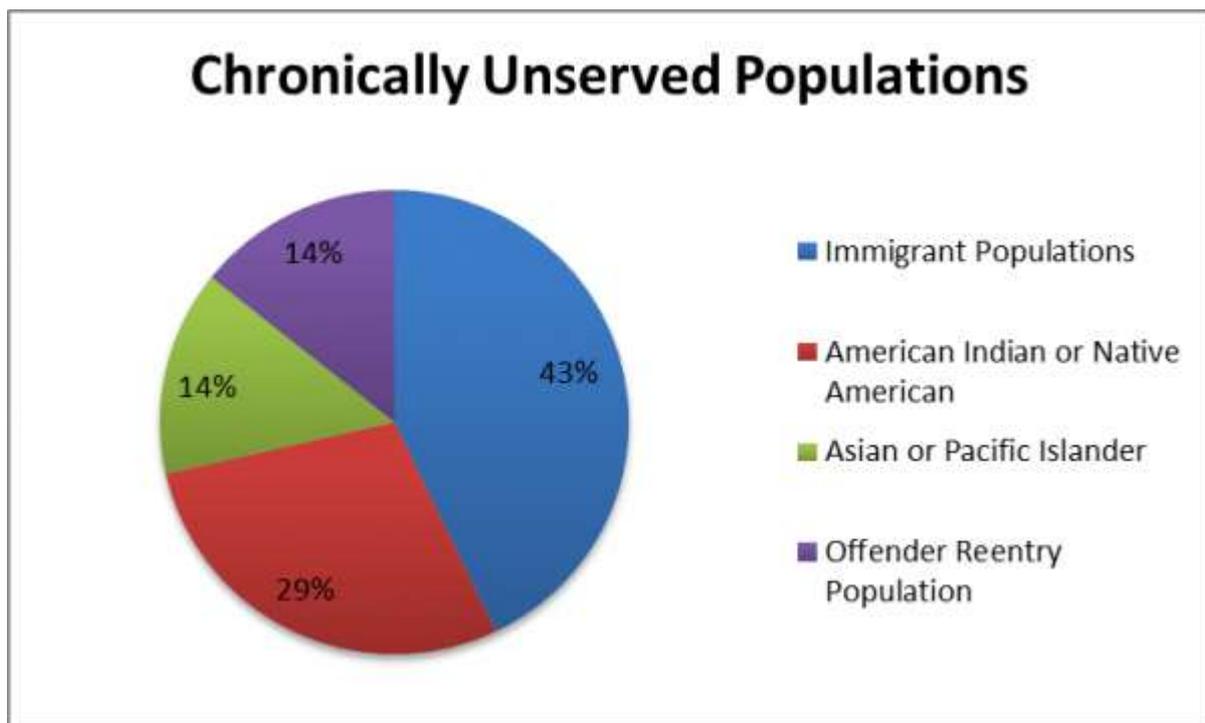


Figure 18: TN VR Chronically Unserved Populations

Additionally, survey respondents identified rural residents, limited English proficiency, Hispanic or Latino, Offender Reentry, and Individuals with substance abuse as those most “underserved” in Tennessee.

## Chronically Underserved Populations

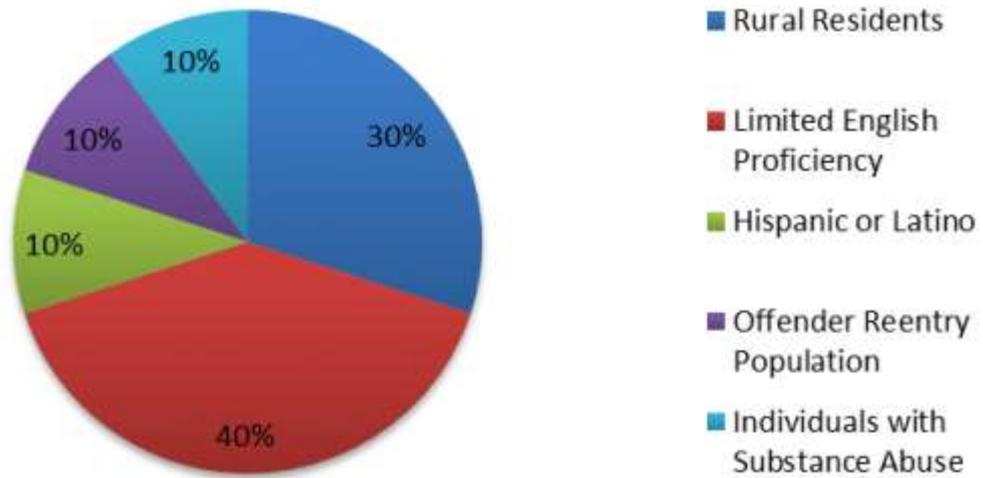


Figure 19: TN VR Chronically Underserved Populations

Populations that were identified through the survey as “potentially served” included: individuals with developmental disabilities, individuals with autism spectrum disorder, individuals who are blind or visually impaired, veterans and inner-city residents.

Additionally, VR staff noted several populations that VR should investigate: LGBT, retention service cases, individuals with worker’s compensation cases, individuals with Traumatic brain injury, individuals with Spinal cord injury, individuals who are victims of crimes or domestic abuse, and individuals who have dual diagnosis.

## Potentially Served Populations

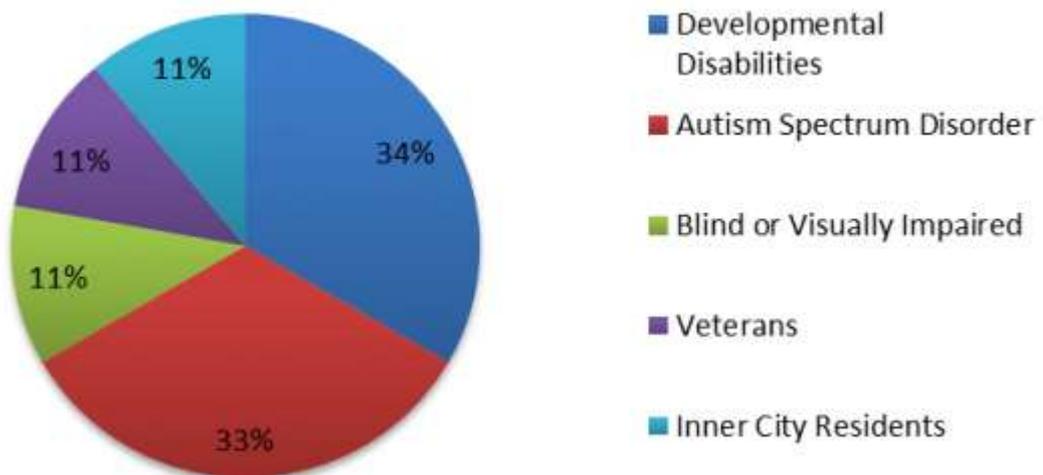


Figure 20: TN VR Potentially Served Populations

When asked what they felt the unmet needs of those populations identified as “unserved” or “underserved” were, survey respondents indicated that knowledge of VR services, transportation, and awareness of opportunities were among the top needs identified.

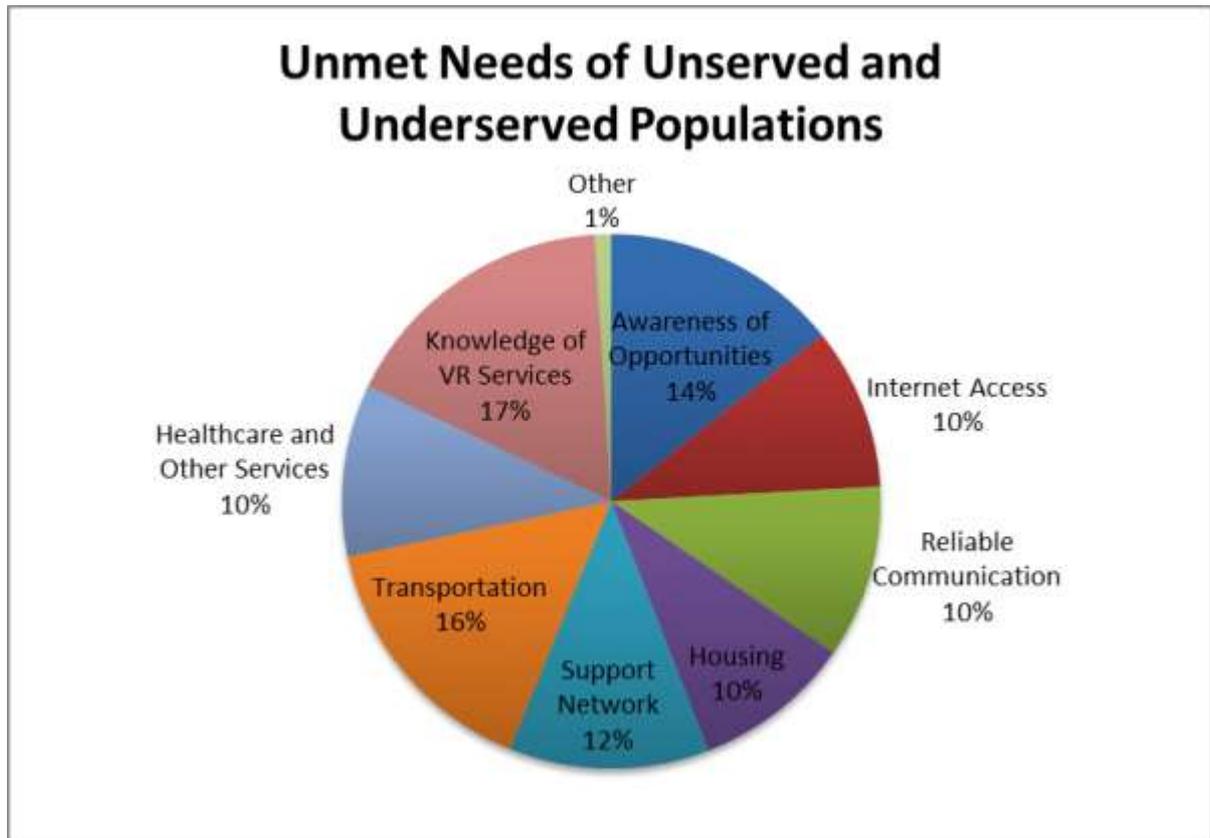


Figure 21: TN VR Unmet Needs of Unserved and Underserved Populations

Finally, when asked for ideas on how to better reach these individuals, survey responses were evenly distributed among the need to work with existing partners and to establish partnerships with local community centers, libraries, faith communities, or any place where the identified populations might regularly gather to meet these populations where they are.

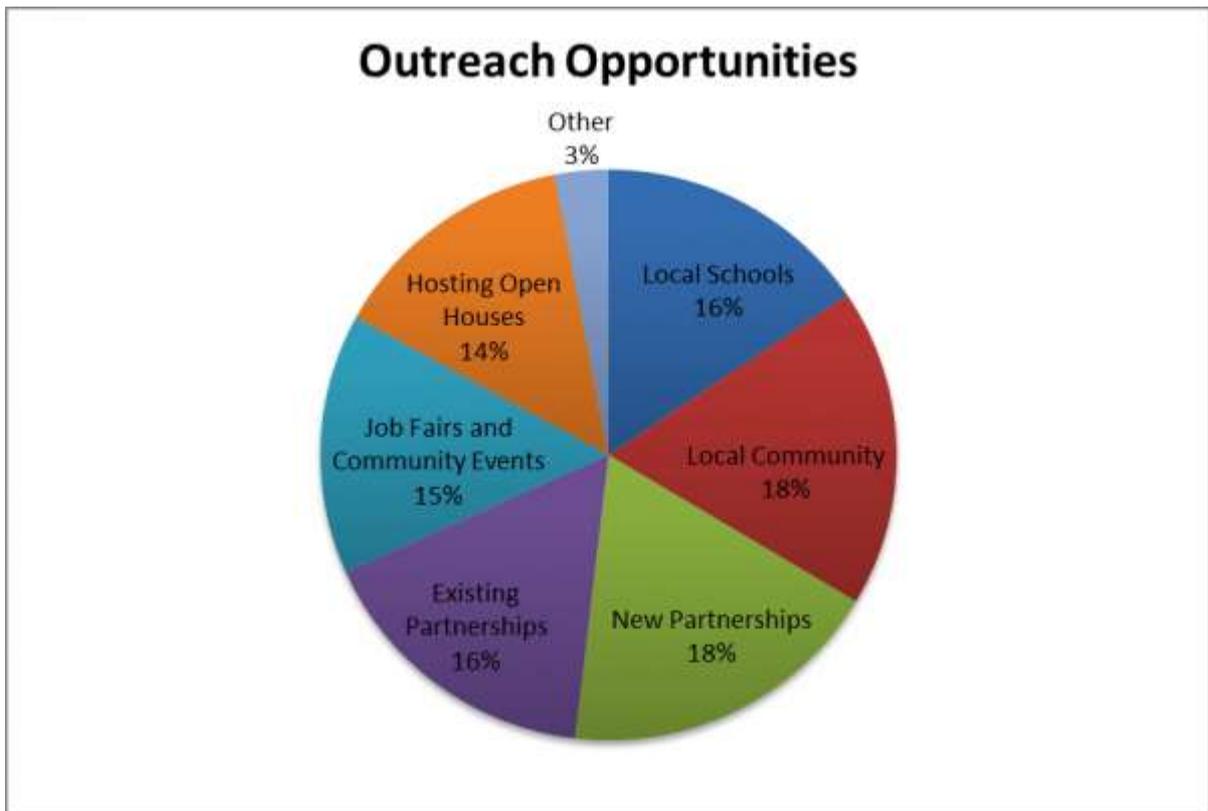


Figure 22: TN VR Outreach Opportunities

The last component of the 2019 needs assessment focused on youth and/or students with disabilities and their needs for potential Pre-Employment Transition Services (Pre-ETS). Tennessee's goals for Pre-ETS are to:

- Ensure students have quality employment outcomes which are not “just a job,” but a career path
- Broaden the scope and range of services to meet the needs of individual students within Local Education Agencies (LEAs)
- Work collaboratively with schools to determine the needs of students

Pre-ETS services address five areas, including job exploration counseling, work-based learning, counseling on post-secondary enrollment opportunities, workplace readiness training on social and independent living skills, and instruction in self-advocacy.

Since 2016, the Division has focused on expanding its provision of Pre-ETS services statewide. Currently, the division has 23 Pre-ETS Specialists and 3 Field Supervisors and is continuing to grow as needs are identified. In August 2019, the division was excited to announce the hiring of a new transition director, Blake Shearer, who will be responsible for leading the division's transition programs for students and youth with disabilities. Blake comes from the Tennessee Department of Education, where he dedicated himself to establishing partnerships between schools, state agencies, and other stakeholders to increase employment outcomes for students with different abilities. His expertise in the field and his collaborative nature will only help to continue increasing the presence of Pre-ETS in Tennessee.

The growth in the utilization of Pre-ETS services has increased exponentially over the past three years. During the 2016-17 fiscal year, 1,964 pre-ETS services were provided to students across the state. That increased to more than 10,000 in the 2017-2018 school year. During the 2018-2019 school year, 42,616 pre-ETS were delivered, representing a 300 percent year-over-year increase.

Additionally, the state has partnered with Vanderbilt University and the Vanderbilt Kennedy Center to develop a portal on the Transition Tennessee site that focuses specifically on Pre-Employment Transition Services. Launched in spring 2019, this site expands the state’s capacity to provide high-quality, evidence-based pre-employment transition services that lead to successful post-secondary and employment outcomes for students with disabilities. The Transition Tennessee Pre-ETS Blueprint serves as an online hub for professional development and resources on Pre-ETS and offers guidance on the components of Pre-ETS to assist providers in delivery of these services. This new portal includes two courses on the foundations of Pre-ETS:

- The Power of Early Work Experiences
- Overview of WIOA and Pre-ETS

Each course features free video modules, downloadable resources, webcasts, and information about upcoming conferences and trainings. Additional courses will be added that focus on Interagency Collaboration, Connecting with Employers and Families, the Student-Centered Approach to Transition Instruction, and each of the five pre-employment transition services.

Between September 2018 and April 2019, Transition TN conducted a needs assessment of Pre-ETS services. Across all three assessments that the agency conducted, it was strongly agreed that youth with disabilities “Need substantial help preparing for the world of work.”

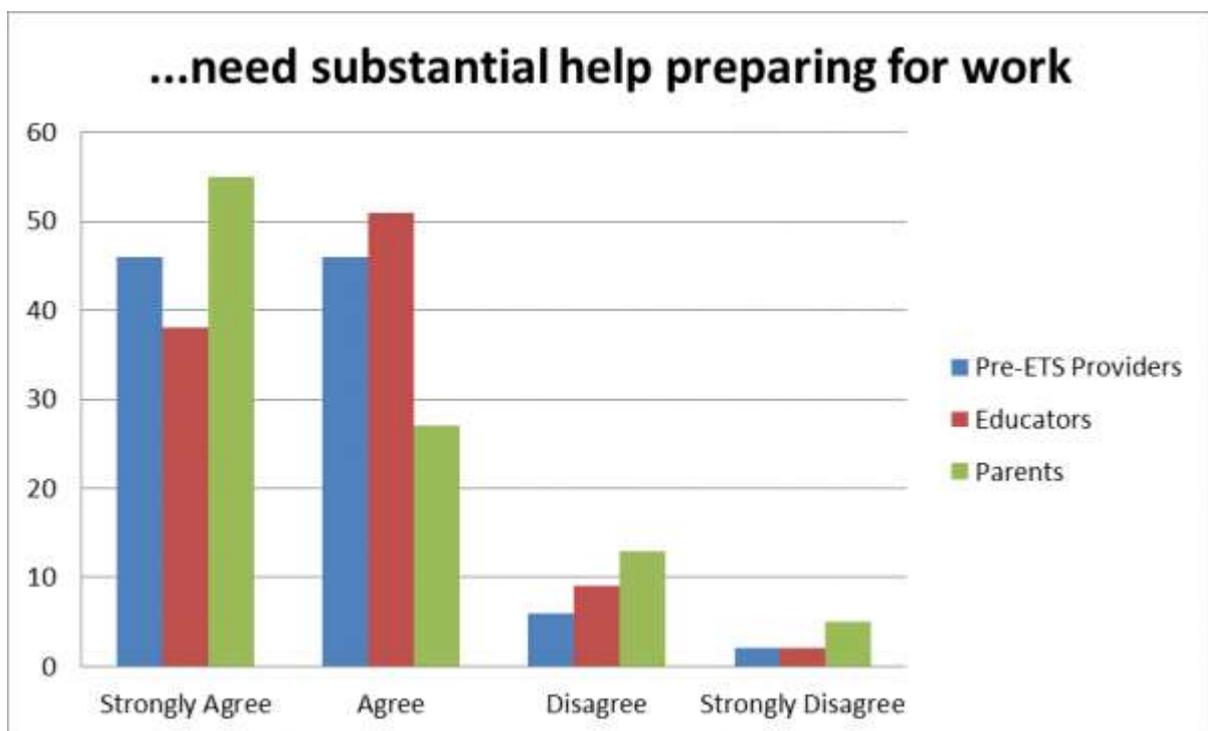


Figure 23: TN VR ...need substantial help preparing for work

Across the board, both Pre-ETS providers and educators agreed that the five areas that Pre-ETS services address could greatly benefit youth with disabilities. Over half of parents also agreed that their children could benefit from these services; however according to information reported, there was an evident gap in knowledge about the Pre-ETS program.

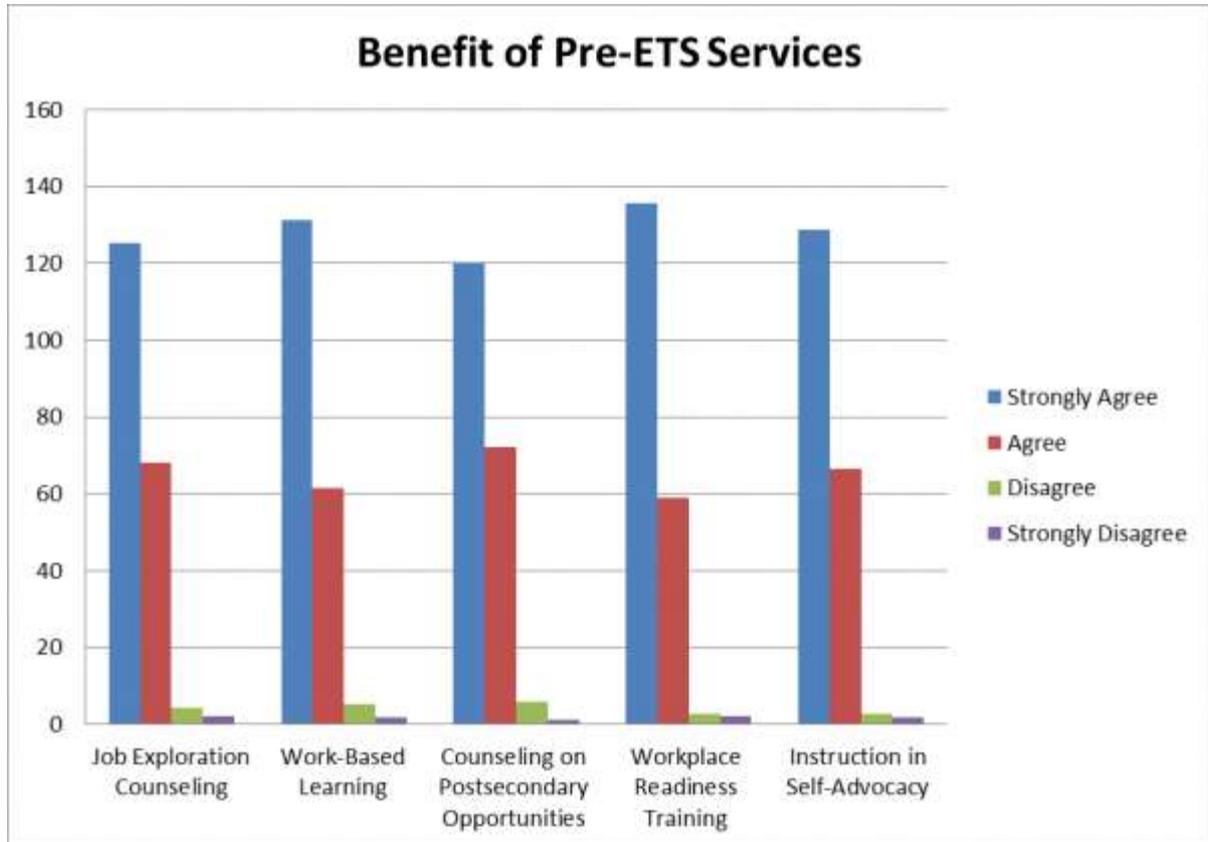


Figure 24: TN VR Benefit of Pre-ETS Services

**B. Who are minorities;**

Response provided in section j.1.A. above.

**C. Who have been unserved or underserved by the VR program;**

Response provided in section j.1.A. above.

**D. Who have been served through other components of the statewide workforce development system; and**

Response provided in section j.1.A. above.

**E. Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.**

Response provided in section j.1.A. above.

## **2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and**

When services are not provided by VR staff, such as those offered in the CTCs or at TRC Smyrna, VR engages with various for- and not-for-profit partners, commonly referred to as Community Rehabilitation Providers or CRPs, to deliver individualized and specialized services to customers. These services can include supported employment, job readiness and placement, and other services that provide training in preparation for competitive, integrated employment. Community Rehabilitation Provider partnerships are typically carried out through contractual relationships or by Delegated Authority and allow the VR program the flexibility to provide a comprehensive array of highly individualized services while clearly communicating service level expectations and provider accountability. In fiscal year 2019, VR contracted with over 150 CRPs and other entities across the state to deliver specialized services to individuals participating in the VR program.

According to the 2019 VR Needs Assessment, CRPs were the most satisfied group when it came to questions related to VR service delivery. However, those surveyed identified some potential areas for improvement, including streamlining the reporting process, ensuring an equitable referral process, improving the payment process, reducing VR staff turnover, providing additional training to VR staff, and improving communication.

This last identified need –improving communication – was also identified in the 2016 needs assessment. Since that time, the division has made strides to improve upon its relationship with CRPs. In 2014, the division’s Contracts Unit began hosting provider forums where information is shared and a greater level of communication between VR and its CRPs is reached. The forums serve as the primary platform for information exchange for the VR Contracts Unit staff, VR field staff and CRPs. Forum participants share best practices/trends, ask and answer questions, raise concerns and keep each other informed of upcoming changes and other aspects of service provision. Providers have expressed their appreciation for timely sharing of information and guidance provided at the Forums regarding VR requirements. The Forums always consist of a question and answer period where providers can share with each other helpful information and clarify with the VR Program Specialists any requirements of the terms and conditions of the agreement. This collaborative relationship between VR staff and CRPs is vital to the provision of quality services for VR clients and will continue to be a priority that the division continues to cultivate moving forward.

## **3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act**

Response provided in section j.1.A. above.

## **k. Annual Estimates**

Describe:

## 1. The number of individuals in the State who are eligible for services

Category	Title I or Title VI	Estimated Funds	Est to be Served Under IPE	Average and total Cost of Services
1 and 2	N/A	\$25,250,000	13,928	\$1,813/per case
Category	Title I or Title VI	Estimated Funds	Est to be Served Under IPE	Average and total Cost of Services
1	Title VI included	0	9,750	\$17,675,000
2	N/A	0	4,178	\$7,575,000
Totals	N/A	0	13,928	\$25,250,000

As of Sept 30, 2019, 8,767 individuals in the state are eligible for services under an IPE. Of this number and in compliance with our Order of Selection, 7,871 are receiving services provided with Title I, Part B funds and 896 are receiving services provided with Title VI, Part B funds and with Title I, Part B funds.

For Fiscal Year 2020, it is projected that there will be 6,057 new applicants and that 13,928 individuals in the state will be eligible for services under an IPE. Of this number, 13,002 will receive services under an IPE provided with Title I, Part B funds and 926 will receive services under an IPE provided with Title VI, Part B funds and with Title I, Part B funds. It is estimated that the number of individuals to be served under Title I, Part B and Title VI, Part B under an IPE during Fiscal Year 2020 under each priority category within our Order of Selection will be:

- Priority Category 1 – 9,750 (Includes Title VI, Part B)
- Priority Category 2 - 4,178

Total 13,928

Note: Estimates for eligible individuals and those who will be provided services under our Order of Selection in Fiscal Year 2020 is based on current trends and adjustments to utilization of Title VI, Part B funds.

It is estimated that the cost of Title I, Part B and Title VI, Part B services for the projected 13,928 individuals who will be eligible for services under an IPE will be approximately \$25,250,000 and that the service cost for each priority category within the Order of Selection for the individuals served will be:

- Priority Category 1 - \$17,675,000 (Includes Title VI, Part B)
- Priority Category 2 - \$7,575,000

Total \$25,250,000

Note: Estimated cost for services is based on the total available funding approved by the State's Department of Finance and Administration for our Delegated Purchase Authority.

**Table 29 b: TN VR - Estimated Cost for Services FY21**

Category	Title I or Title VI	Estimated Funds	Est to be Served Under IPE	Average and total Cost of Services
1 and 2	N/A	\$25,986,344	12,160	\$2,137/per case
Category	Title I or Title VI	Estimated Funds	Est to be Served Under IPE	Average and total Cost of Services
1	Title VI included	0	8,106	\$18,190,441
2	N/A	0	4,054	\$7,795,903
Totals	N/A	0	12,160	\$25,986,344

For Fiscal Year 2021, it is projected that there will be 6,103 new applicants and that 12,160 individuals in the state will be eligible for services under an IPE. Of this number, 11,329 will receive services under an IPE provided with Title I, Part B funds and 831 will receive services under an IPE provided with Title VI, Part B funds and with Title I, Part B funds. It is estimated that the number of individuals to be served under Title I, Part B and Title VI, Part B under an IPE during Fiscal Year 2021 under each priority category within our Order of Selection will be:

- Priority Category 1 – 8,106 (Includes Title VI, Part B)
- Priority Category 2 - 4,054

Total 12,160

Note: Estimates for eligible individuals and those who will be provided services under our Order of Selection in Fiscal Year 2021 is based on current trends and adjustments to utilization of Title VI, Part B funds.

It is estimated that the cost of Title I, Part B and Title VI, Part B services for the projected 12,160 individuals who will be eligible for services under an IPE will be approximately \$25,986,000 and that the service cost for each priority category within the Order of Selection for the individuals served will be:

- Priority Category 1 - \$18,190,441 (Includes Title VI, Part B)
- Priority Category 2 - \$7,795,903

Total \$25,986,344

Note: Estimated cost for services is based on the total available funding approved by the State's Department of Finance and Administration for our Delegated Purchase Authority.

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Revised Response for k.1 inserted below. Previous response was not removed because other sections were not opened to allow for this response to be moved to the appropriate sections.

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Cornell University produces annual disability status reports for each state that look at the social and economic status of non-institutionalized people with disabilities in the state. According to their 2017 Disability Status Report, which uses data from the 2017 American Community Survey (ACS), the following disability and employment statistics were identified and reported on in the Comprehensive Statewide Needs Assessment that TN VR conducted in 2019:

Prevalence of Disability in Working-Age (21-64) People (2017): Tennessee - 13.7%, Nation - 10.6%, Difference - +3.1%

Employment Rate of Working-Age (21-64) People with Disabilities (2017): Tennessee - 34.5%, Nation - 37.3%, Difference - -2.8%

Employment Rate of Working-Age (21-64) People without Disabilities (2017): Tennessee - 79.4%, Nation - 79.4%, Difference - 0

Employment Rate of Working-Age (21-64) People with and without Disabilities in TN (2017): Tennesseans with Disabilities - 34.5%, Tennesseans without Disabilities 79.4%, Difference - -44.9%

According to the most recent data obtained by the Tennessee Department of Education report card, the below table illustrates the number of students with disabilities (defined as those who have an IEP) from the 1,758 schools offering Pre-K – 12th grade across the state of TN: Total # of Students - 973,659, # of Students with Disabilities (IEP) - 131,003, % of Students with Disabilities (IEP) - 13.5%.

## 2. The number of eligible individuals who will receive services under:

### A. The VR Program;

Response provided in section k.1 above.

### B. The Supported Employment Program; and

Response provided in section k.1 above.

### C. Each priority category, if under an order of selection.

As described in section 2A, it is estimated that the number of individuals to be served under Title I, Part B and Title VI, Part B under an IPE during Fiscal Year 2020 under each priority category within our Order of Selection will be:

- Priority Category 1 – 9,750 (Includes Title VI, Part B)
- Priority Category 2 - 4,178

Total 13,928

It is estimated that the number of individuals to be served under Title I, Part B and Title VI, Part B under an IPE during Fiscal Year 2021 under each priority category within our Order of Selection will be:

- Priority Category 1 – 8,106 (Includes Title VI, Part B)
- Priority Category 2 - 4,054

Total 12,160

The Division will monitor expenditures for case services and administrative costs to determine if enough resources are available to schedule releases of Priority Category 3 and 4 cases for services or to open Priority Category 3 cases for a full range of services. Therefore, continuation of the Order of Selection mandated by the Rehabilitation Act of 1973, as amended, to determine which eligible individuals will be served under an IPE is still warranted due to limited resources. At this time, we do not anticipate having the resources to provide services to eligible individuals in priority categories 3 and 4.

**3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and**

	FFY 2018	FFY2019	FFY2020 Projected	FFY2021 Projected
Priority Category 3	107	26	20	20
Priority Category 4	94	31	20	20

The number of individuals in priority categories 3 and 4 decreased significantly from FFY 2018 to FFY 2019. This decrease was the result of routine contacts made to individuals in priority categories 3 and 4 to follow up and evaluate current needs and circumstances. Through this process we have identified individuals who were eligible to move into categories 1 and 2 as well as individuals who could be referred to other programs and were no longer in need of VR services. While the number of individuals who are eligible but are not receiving services due to Order of Selection is declining, we are also seeing a decline in the number of new individuals added to these priority categories. The Division has been operating under Order of Selection since August 1, 2001 which is known throughout the advocacy community and our potential customer base. We understand that the number of individuals currently on our waitlist does not accurately reflect the number of individuals across the State who may be eligible for priority categories 3 and 4 were they to be opened. Based on this information, the projected number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection for FFY 2020 and FFY 2021 are estimated in the table above.

**4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.**

As described in section 2A, it is estimated that the FFY 2020 cost of Title I, Part B and Title VI, Part B services for the projected 13,928 individuals who will be eligible for services under an IPE will be approximately \$25,250,000 and that the service cost for each priority category within the Order of Selection for the individuals served will be:

- Priority Category 1 - \$17,675,000 (Includes Title VI, Part B)
- Priority Category 2 - \$7,575,000

Total \$25,250,000

Note: Estimated cost for services is based on the total available funding approved by the State's Department of Finance and Administration for our Delegated Purchase Authority.

For FFY 2021, it is estimated that the cost of Title I, Part B and Title VI, Part B services for the projected 12,160 individuals who will be eligible for services under an IPE will be approximately \$25,986,000 and that the service cost for each priority category within the Order of Selection for the individuals served will be:

- Priority Category 1 - \$18,190,441 (Includes Title VI, Part B)
- Priority Category 2 - \$7,795,903

Total \$25,986,344

Note: Estimated cost for services is based on the total available funding approved by the State's Department of Finance and Administration for our Delegated Purchase Authority.

As mentioned in section 2C, the Division will monitor expenditures for case services and administrative costs to determine if enough resources are available to schedule releases of Priority Category 3 and 4 cases for services or to open Priority Category 3 cases for a full range of services. Therefore, continuation of the Order of Selection mandated by the Rehabilitation Act of 1973, as amended, to determine which eligible individuals will be served under an IPE is still warranted due to limited resources. At this time, we do not anticipate having the resources to provide services to eligible individuals in priority categories 3 and 4.

## I. State Goals and Priorities

The designated State unit must:

**1. Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions**

Members of the SRC extensively reviewed all recommendations received through the VR Needs Assessment to determine what VR leadership and staff should prioritize for program improvement over the next three to four years. Below, there is discussion on the seven priorities identified.

### **#1 – Talent Management – hiring, training, retention, and fair compensation**

Across almost all the respondents to the VR Needs Assessment, staff turnover was identified as a major issue affecting VR service delivery. Not only is turnover seen as a disruption in provision of service, but it affects the relationship and trust that customers have in the VR program. It was recommended that VR try its best to maintain seasoned staff to help ensure continuity of services.

## **#2 – Communication and Responsiveness**

Across the board, improvements in communication and responsiveness were cited as areas that VR needed to improve upon. Survey responses noted, communication, both internal and external, are critical to fostering trust and credibility with internal and external stakeholders. Recommendations for reliable, accurate, transparent, and timely two-way communication were consistent throughout the surveys.

## **#3 – Timeliness of Services**

According to the VR survey, while CRPs were overall satisfied with timeliness and responsiveness of the VR staff that they coordinated service delivery with, Customers and Caregivers were not. This is a significant difference that must be explored fully. Customers and caregivers specifically recommended that VR ought to look at improving the length of time it takes to obtain assistive technology, improve response time, and improve upon follow-up time.

## **#4 – Customer Engagement**

Active participation of customers throughout their VR case enabling them to practice informed choice through the process, including development of the Individualized Plan for Employment was a common theme identified in all surveys. Rooted in the Vocational Rehabilitation program's emphasis on INDIVIDUALIZED services – the VR customer must be an active and engaged participant. VR customers must be included in the decisions that are affecting their lives. This includes the selection of services and service providers that best meet the needs of each customer.

## **#5 – Transportation**

Transportation was identified as a major barrier impeding individuals with disabilities from obtaining employment in the community. Specifically, it was noted as a major impediment to those individuals who were identified as chronically unserved or underserved and as a major impediment in rural areas. This is a barrier that VR is not facing alone. Transportation is continually cited as one of the largest barriers affecting individuals with disabilities, seniors, low-income individuals, and those in rural areas. It will be critical for VR staff to continue to work with their partners on identifying creative solutions and looking for opportunities to collaborate with new and existing partners across the state to address this barrier.

## **#6 – Community Partners and Resources**

Each of the surveys identified opportunities for VR to create community resources that make it easier for the public to understand what services are available to them. Additionally, while WIOA Partners who took the survey reported that they understand what role their organization plays in meeting the

requirements of WIOA and that the WIOA State Combined Plan serves as a guiding document for their organization; they don't necessarily understand the role that all other TN WIOA partners play. In addition to community resources, creating cross-agency resources that allow sharing of relevant data, reporting measures, and the ability to jointly monitor progress toward outcome-based results were all cited as recommendations.

## **#7 – Pre-Employment Transition Services**

- As was referenced earlier, Pre-ETS providers, educators, and parents all feel that youth with disabilities do and could greatly benefit from Pre-ETS services. The disconnect revealed in the Pre-ETS Needs Assessment is ensuring that those who need the services know about the services. Communicating and informing the public, schools, youth, parents, and stakeholders about Pre-ETS services is something that the division has been and will continue to address.

Building on these recommendations, the Division of Rehabilitation Services is embarking on a 4-year strategic plan (2020-2024) to transform the Vocational Rehabilitation Program and revolutionize the customer experience. Focusing on the customer and the customer experience, the goal of the transformation is to create an environment where individuals and business served, along with VR staff and partners feel welcome, informed, and encouraged.

By the end of this transformation, the goal of the Division is to ensure that:

- VR is responsive, welcoming, informative, and encouraging showing individuals and businesses what is possible.
- Businesses seek out VR services to transform their operations and meet their workforce needs and ultimately improve their bottom line.
- CTRCs are transformed into community-based resource centers offering community-based employment training and connecting VR and non-VR customers to education, training and employment resources.
- Pre-ETS are coordinated, collaborative, connected services that prepare students with disabilities for a seamless transition to life after high school.

To achieve this transformation, the division has identified 5 strategic priorities as outlined below.

### Strategic Priorities:

1. Communication - Foster trust and credibility with internal and external stakeholders through reliable, accurate, transparent, and timely two-way communication.
  - a. Create and tell a clear story of the Division's work, priorities, and successes
  - b. Encourage safe and respectful workplace communication with mechanisms for staff to know priorities and express concerns

- c. Enhance transparency and responsiveness by encouraging open dialogue with stakeholders
  - d. Guarantee staff at all levels embrace stakeholder input and feel responsibility and ownership for partnerships and collaboration
- 2. Leadership and Talent Management - Support a professional workforce that is organized and structured to deliver high quality vocational rehabilitation services through effective teams.
  - a. Advance a culture of high performance through professional development and accountability
  - b. Recruit, develop, retain and recognize quality employees and equip them to deliver high quality service through continuous coaching and training
  - c. Sustain efforts through staff retention and thoughtful succession planning
- 3. Modernization of Systems and Processes - Implement integrated systems and business processes that promote operational efficiency and programmatic effectiveness focused on the customer experience.
  - a. Draft division business model that supports the department's mission, vision, and core values
  - b. Implement a case management system that empowers staff, customers, and providers with access to information
  - c. Confirm division policies reflect a strengths-based and person-centered philosophy
- 4. Revolutionize Service Delivery - Build innovative and effective service delivery models to better support businesses and individuals with disabilities in driving the achievement of their employment goals.
  - a. Identify and implement evidenced-based models that lead to increased employment outcomes for individuals with disabilities
  - b. Support Tennessee businesses in meeting their workforce needs with job ready workers
  - c. Prepare students with disabilities for successful transition from high school to adulthood
  - d. Foster understanding with our partners about common goals, shared responsibilities and desired outcomes
- 5. Data Driven Services and Outcomes - Achieve improved employment outcomes for people with disabilities through data driven rehabilitation services and employment initiatives.
  - a. Enhance capacity of staff to use and analyze data to inform and improve practice and outcomes
  - b. Advance the integration of data systems with other resources as appropriate to facilitate innovative service delivery and collaboration
  - c. Share program data and outcomes with stakeholders to create an environment that promotes continuous quality improvement

Each of the strategic priorities listed above can be linked to one or more of the recommendations made by the SRC. Strategic plans to improve communication will incorporate recommendations 2 and 6. The division's focus on talent management will target key action steps to address recommendation 1. And the strategic plans to modernize systems and processes, revolutionize service delivery, and provide data driven services and outcomes will be built around recommendations 3, 4, 5, and 7. The Division of Rehabilitation Services and the Vocational Rehabilitation Program look forward to continuing to work with the SRC to design the 4-year strategic plan.

Specific Actions that VR will be taking over the next four years:

- Continued implementation of the new case management system, Aware (target implementation date June/July 2021).
- Review of revision of VR policies and procedures to ensure alignment with the division's mission, vision, and values – included a renewed emphasis on person-centered practices.
- Statewide implementation of person-centered training for all staff.
- Design and development of the plan to transform the 17 Community Tennessee Rehabilitation Centers based on the findings and recommendations of Synergy Consulting partners.
- Assess and evaluate the division's approach to professional development including an update and re-design of new counselor training, general staff on-boarding and other professional development opportunities for staff on an ongoing basis.
- Assess and evaluate the division's staffing to include a review of position classification and compensation for alignment with the roles and responsibilities of a modernized, community-based vocational rehabilitation program.
- Improve and expand the opportunities for customer engagement throughout the vocational rehabilitation process, gathering feedback and input from VR customers at various points throughout their employment journey.

## 2. Identify the goals and priorities in carrying out the VR and Supported Employment programs

In order to successfully deliver the VR program, including Supported Employment services, the Division of Rehabilitation Services have identified the following goals and timelines for achieving these goals, that will help to meet the five strategic priorities identified in the division's strategic plan. These goals include, but are not limited to the following:

1. Implementation of the VR new case management system, Aware
  - a. Target implementation date: June 2021
2. Review and revision of VR policies and procedures to ensure alignment with the division's mission, vision, and values, including a renewed emphasis on person-centered practices

- a. Phased approach beginning in early 2020 and continuing throughout 2020
- 3. Statewide implementation of person-centered training for all staff
  - a. Phased approach beginning in summer 2020 and continuing throughout 2020 – 2021
- 4. Design and development of the plan to transform the 17 Community Tennessee Rehabilitation Centers based on the findings and recommendations of Synergy Consulting partners.
  - a. Phased approach beginning in early 2020 and continuing throughout 2020
- 5. Assess and evaluate the division’s approach to professional development including an update and re-design of new counselor training, general staff on-boarding and other professional development opportunities for staff on an ongoing basis.
  - a. Phased approach beginning in 2020 and continuing on an ongoing basis as new training needs and opportunities present themselves.
- 6. Assess and evaluate the division’s staffing to include a review of position classification and compensation for alignment with the roles and responsibilities of a modernized, community-based vocational rehabilitation program.
  - a. Target implementation date: January 2021
- 7. Improve and expand the opportunities for customer engagement throughout the vocational rehabilitation process, gathering feedback and input from VR customers at various points throughout their employment journey
  - a. Phased approach beginning in fall 2020 and continuing throughout early 2021

### 3. Ensure that the goals and priorities are based on an analysis of the following areas:

#### A. The most recent comprehensive statewide assessment, including any updates;

Response provided in section I.1 above.

#### B. The State’s performance under the performance accountability measures of section 116 of WIOA; and

Two of the strategic priorities for the Division of Rehabilitation Services involve modernization of systems utilized by the division and the increased use of data to drive outcomes and ensure performance accountability. The division will be implementing a new VR case management system in June 2021. This new case management system will empower staff, customers, and providers with increased access to information and data, allowing staff to more accurately track performance goals and metrics, and to better identify trends. Additionally, staff have recently received access and training on Tableau, a data analytics software that will enhance the division’s capacity to use and analyze real-time data to inform and improve practice and program outcomes.

#### C. Other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation

Council and findings and recommendations from monitoring activities conducted under section 107.

Response provided in section I.1 above.

## m. Order of Selection

Describe:

1. Whether the designated State unit will implement and order of selection. If so, describe:

A. The order to be followed in selecting eligible individuals to be provided VR services

The Division has established four (4) categories in determining individuals to be provided VR services. The Order of Selection categories in the order to be followed are:

PRIORITY CATEGORY I -- Eligible individuals who have the most significant disabilities

PRIORITY CATEGORY II -- Eligible individuals who have significant disabilities

PRIORITY CATEGORY III -- Eligible individuals who do not have significant disabilities and whose vocational rehabilitation is expected to require multiple vocational rehabilitation services

PRIORITY CATEGORY IV -- Eligible individuals who do not have a significant disability that cannot be classified into a higher priority category

Definitions:

The Order of Selection is based on a refinement of the three criteria in the definition of "Individual with a Significant Disability" in 34 CFR § 361.5(c)(30).

"Significant Disability" means an individual meets the following three criteria:

1. Has a severe physical, sensory or mental impairment which seriously limits at least one functional capacity (such as cognitive, visual/mobility, communication, self-care, self-direction,

interpersonal skills, motor skills, work tolerance, or work skills) in terms of an employment outcome;

1. Has one or more physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, deaf /blind, head injury, heart disease, hemiplegic, hemophilia, respiratory or pulmonary dysfunction, mental retardation, mental illness, multiple sclerosis, muscular dystrophy, musculoskeletal disorders, neurological disorders (including stroke and epilepsy), paraplegia, quadriplegia and other spinal cord conditions, sickle cell anemia, specific learning disability, and end-stage renal disease; or another disability or combination of disabilities determined on the basis of an assessment for determining eligibility, and vocational rehabilitation needs to cause comparable substantial functional limitation; and
  
1. The individual's vocational rehabilitation program can be expected to require multiple vocational rehabilitation services over an extended period of time.

"Most Significant Disability" means an individual meets the definition for "Significant Disability" with the exception the individual has a severe physical, sensory or mental impairment which seriously limits two or more functional capacities in terms of an employment outcome.

"Non-Significant Disability" means an individual does not meet the criteria for "Significant Disability".

"Multiple Vocational Rehabilitation Services" means two or more major vocational rehabilitation services, such as, physical or mental restoration, training, and placement. Excluded are support services such as transportation, maintenance and the routine counseling and guidance that takes place in every case.

"Extended Period of Time" means 6 months from the date services begin until the employment objective is achieved.

## **B. The justification for the order**

On August 1, 2001, the Division implemented an Order of Selection in accordance with federal regulation 34 CFR § 361.36 due to limited resources preventing the Division from providing the full range of services to all eligible individuals. Following implementation of the Order of Selection, the Division provided a full range of services for individuals in Priority Category 1 (eligible individuals who have the most significant disabilities) until October 2012 when the Division opened Priority Category 2 and began providing a full range of services for individuals in Priority Categories 1 and 2. Since 2009 the Division has had numerous releases of Priority Category 2 (until October 2012) and 3 cases as resources have become available.

The Division anticipates available resources to remain insufficient to provide a full range of services for all eligible individuals based on previous state funding and other non-federal share available to draw an average of \$58,000,000 in federal funds since 2016. As required by federal regulations, fifteen percent (15%) of the finally awarded federal funds must be set aside and spent providing Pre-Employment Transition Services (Pre-ETS) directly to students with disabilities aged 14 to 22 and in general may not be used for administrative costs required to provide those Pre-ETS services. The Division expects to continue to obligate approximately \$25,250,000 in direct service funds and an additional \$13,317,004.50 in contracted services for both non-Pre-ETS and Pre-ETS recipients. These funds are allocated for services to an estimated 6,057 new cases and for IPE services for approximately 13,928 existing and new Priority Category 1 and 2 recipients and for the provision of individualized and discrete services to potentially eligible students with disabilities eligible through Pre-ETS.

The Division will continue to provide a full range of assessment services for all applicants that apply throughout the year to determine eligibility and priority for services and will continue to monitor resources and adjust as resources are made available.

The Division will monitor expenditures for case services and administrative costs to determine if enough resources are available to provide a full range of services for individuals in Priority Categories 1 and 2 and to schedule releases of Priority Category 3 and 4 cases for services or to open Priority Category 3 cases for a full range of services. Therefore, continuation of the Order of Selection mandated by the Rehabilitation Act of 1973, as amended, to determine which eligible individuals will be served under an IPE is still warranted due to limited resources.

## C. The service and outcome goals

The Order of Selection priority categories outcome and service goals and time frames are as follows:

### **FFY 2020**

PRIORITY CATEGORY I - Eligible individuals who have the most significant disabilities

1. Outcome and Service Goal: Expect to determine eligibility for 4,240 new individuals in this priority category; serve 9,750; and close 1,120 successfully employed.
2. Goal will be achieved by September 30, 2020.

PRIORITY CATEGORY II - Eligible individuals who have significant disabilities

1. Outcome and Service Goal: Expect to determine eligibility for 1,817 new individuals in this priority category; serve 4,178; and close 480 successfully employed.
2. Goal will be achieved by September 30, 2020.

### **FFY 2021**

PRIORITY CATEGORY I - Eligible individuals who have the most significant disabilities

1. Outcome and Service Goal: Expect to determine eligibility for 4,272 new individuals in this priority category; serve 8,512; and close 979 successfully employed.
2. Goal will be achieved by September 30, 2021.

#### PRIORITY CATEGORY II - Eligible individuals who have significant disabilities

1. Outcome and Service Goal: Expect to determine eligibility for 1,831 new individuals in this priority category; serve 3,648; and close 419 successfully employed.
2. Goal will be achieved by September 30, 2021.

The Division will monitor expenditures for case services and administrative costs to determine if enough resources are available to schedule releases of Priority Category 3 and 4 cases for services or to open Priority Category 3 cases for a full range of services. Therefore, continuation of the Order of Selection mandated by the Rehabilitation Act of 1973, as amended, to determine which eligible individuals will be served under an IPE is still warranted due to limited resources. At this time, we do not anticipate having the resources to provide services to eligible individuals in priority categories 3 and 4.

#### D. Time within which these goals may be achieved for individuals in each priority category within the order; and

Response provided in section m.1.C above.

#### E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities

The Division is currently providing a full range of services for individuals determined to be Priority Category 1 (eligible individuals who have the most significant disabilities) and Priority Category 2. If the Division cannot continue to provide a full range of services for all individuals determined to be Priority Category 1 and 2, then individuals in Priority Category 1 will continue to be served and individuals in Priority Category 2 will be provided services based on the date of application for services. If the Division cannot continue to provide a full range of services for all Priority Category 1, then services will be provided based on the date of application for services.

To increase service delivery and open the closed Priority Categories, the Division is requesting additional state funding in state fiscal year 2021 to fully leverage the federal award. If the funding request is approved, the state will reevaluate the order of selection.

#### 2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment

The Division elects not to serve eligible individuals, regardless of any established order of selection who require specific services or equipment to maintain employment.

## n. Goals and Plans for Distribution of title VI Funds

### 1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services

It is the continued goal of the Division to provide quality supported employment services which are delivered in an effective, efficient and timely manner. Supported employment services are provided by preferred Community Rehabilitation Providers (CRPs) approved by the Division and in collaboration with programs developed by the Departments of Intellectual and Developmental Disabilities (DIDD) and Mental Health and Substance Abuse Services (DMHSAS) and by the Division of TennCare (TN's Medicaid program).

The Division has implemented an approval process that selects CRPs based on staff experience and training. CRP Employment Specialists training may be provided through the Association of Certified Rehabilitation Education (ACRE) or Employment Specialists certification by obtaining a Certified Employment Support Professional (CESP) certification or Certified Rehabilitation Counselor certification. Tennessee CRPs have been proactive in securing the CESP certification and there have been over 225 reported staff that have obtained the certificate since CESP certification was introduced to the state.

Following assessment by VR Counselors to determine if extended and on-going support services are needed to support an individual with the most significant disability in competitive integrated employment, individuals are referred to approved CRPs for the development and provision of supported employment services and extended and on-going supports (including natural supports).

The Division will continue to seek and approve preferred CRPs to provide supported employment services for individuals with the most significant disabilities for under-served disability groups and for individuals in rural and distressed counties.

The Division maintains an excellent supported employment program along with ongoing training and support activities to ensure the continued provision of quality supported employment services.

Examples of the Division's quality SE program include:

- Through continuing contract with the University of Tennessee, Center for Literacy, Education and Employment (CLEE), the Division funds three supported employment consultants who provide CRP staff training and technical assistance, as needed, for the provision of supported employment services. The consultants also work with the Division staff on an as needed basis to provide technical assistance for supported employment.
- The Division has Program Specialists in the three grand regions of the state who assist in the monitoring of the community rehabilitation providers to ensure appropriate services are being

provided to VR customers and who provide technical assistance, as needed, to CRPs and VR staff.

- The Division has a Central Office liaison who works with TennCare, mental health, intellectual and developmental disabilities, community rehabilitation providers, field staff and other appropriate entities in developing partnerships and collaboration for supported employment services and providing training and technical assistance.

The Division expects to continue increasing competitive integrated employment opportunities for individuals with severe mental illness, including those with co-occurring disorders of alcohol and drug abuse by expanding more effective partnerships with mental health entities through the evidenced based Individual Placement and Support (IPS) Supported Employment Services.

The Division has a Memorandum of Understanding with the Division of TennCare, Long Term Services and Supports that provides for the provision of supported employment services for individuals enrolled in the Employment and Community First (ECF) CHOICES program who have intellectual or developmental disabilities. Beginning in July 2016, Tennessee, through the ECF CHOICES program, became the first state in the country to develop and implement an integrated, home and community-based services program, aligning incentives toward promoting and supporting integrated, competitive employment and independent living as the first and preferred option for individuals with intellectual and developmental disabilities.

The Division has implemented a pilot program utilizing IPS SE services for individuals with mental illness who are receiving Temporary Assistance for Needy Families (TANF). The Division and TANF share in funding the services.

IPS has become a promising SE program for individuals with mental illness who may also have other diagnoses. The Division is exploring, in collaboration with the DMHSAS and DIDD, providing IPS SE for individuals with dual diagnoses such as, intellectual or developmental disabilities and mental illness. The Division is identifying preferred CRPs who work with DIDD/ECF CHOICES providers. A pilot program with one mental health provider has been implemented to learn more about the applicability of IPS SE for individuals with dual diagnoses.

The Division will assure that funds made available for SE will only be used to provide SE services to individuals who are eligible to receive such services.

For FFY 2020 the Division expects to serve in excess of 1,840 individuals through the supported employment program. The Division has consistently closed about 22% of the supported employment cases in successful employment annually. This calculates to approximately 406 successful outcomes for FY2020.

## 2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

### A. The provision of extended services for a period not to exceed 4 years; and

As mandated, the Division has set aside applicable VR funds for extended services for youth with the most significant disabilities who require supported employment but whose extended services are not funded by other entities or sources.

The Division has established appropriate services, trained service providers, and defined the criteria for extended and on-going support services that will be provided for youth with disabilities.

Extended services may be provided for a youth with a disability for up to four (4) years or until the client turns twenty-five (25) years of age, whichever comes first. Extended services for youth may be funded by another state agency or other client resources, such as a Social Security PASS or IRWE; provided by natural supports; or funded by VR provided there are no other means of funding for providing the extended services and the youth has not declined VR providing extended services. If VR funds extended services for a youth with a disability, the case cannot be closed until the time period for providing extended services ends.

For the provision of extended services to youth with disabilities, the Division will continue to collaborate and find partnership opportunities with DIDD, DMHSAS, Department of Education, and other entities to continue outreach to transition students that may need supported employment.

### B. How the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

Under Tennessee's Employment First Taskforce established by Executive Order in 2013 a Youth Memorandum of Understanding (MOU) was signed and executed with the following Agencies that will allow the Division to leverage other public funds to increase resources for extended and on-going support services:

- Department of Education
- Division of Rehabilitation Services, Vocational Rehabilitation Services Program
- Department of Labor and Workforce Development
- Department of Intellectual and Developmental Disabilities
- Department of Mental Health and Substance Abuse Services
- Council on Developmental Disabilities (which oversees the implementation of the MOU).

## o. State's Strategies

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR

and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

## 1. The methods to be used to expand and improve services to individuals with disabilities

Overall, the entire DHS agency is in a period of transformation, moving toward a more integrated service delivery model referred to as “One DHS” that is focused on modernization efforts agency-wide that will dramatically impact that way that human services are delivered and received by Tennesseans. Agency-wide, DHS is striving to improve customer interaction, making it less bureaucratic and more customer friendly, efficient, and effective. While these modernization efforts come with enhanced technology to help create a more efficient service delivery model overall, the driving force behind the initiatives taking place is to ensure that the customer we are serving is at the center of any and all improvements being made.

Taking a similar approach, the Division of Rehabilitation Services is also striving to enhance and better integrate the programs and services that we provide. Over the last three years, the VR program has made significant changes to the way it operates and delivers services.

VR senior leadership has reorganized leadership positions and created additional key positions to increase capacity, knowledge, and expertise across all program areas. Various units within the Division have grown to address the needs of those we serve, providers that we work with, and our key stakeholders. Since 2016, the VR Policy and Contracts Units have greatly expanded to help address training needs for field staff and providers across the state. The VR Business Services Unit (BSU), formed in 2016, is in the process of reorganizing and expanding their capacity to optimally serve rural and urban customers. The BSU partners with area Chambers of Commerce, customers, businesses, and state agencies across the state as strategic partners to increase access to needed education and employment resources by connecting individuals to available local and state agency partners that offer employment, education, and apprenticeship resources that support economic stability. Additionally, the BSU works with business and industry partners to aid in meeting their workforce needs with well-trained, job-ready talent.

The Tennessee Rehabilitation Centers have also been embarking on their own transformation journeys. On July 22, 2019, the Tennessee Rehabilitation Center - Smyrna transitioned from a program-based model to a new Career and Technical Education (CTE) design to enhance the overall service delivery process and better align the Center with the WIOA Primary Indicators of Performance in the areas of Credentialing and Skills Gains. As a result of the Center’s transformation, students are no longer required to participate in a specific program with designated beginning and end dates. Students now choose an Area of Study with classes offered based on an individualized schedule. On a quarterly basis, students attend day and/or evening classes and can enroll in prerequisite, required, or elective classes based on their interests, skill development needs, and Area of Study requirements. All curriculums have also been enriched to have a greater emphasis on work-based learning and community integration through required volunteer, practicum, and internship opportunities with business and industry. Upon completion of all courses, students receive a certificate of completion and have the option to take an exam to receive a national credential in their Area of Study.

DRS is currently assessing how the 17 Community Tennessee Rehabilitation Centers (CTRCs) across the state should be structured to best meet the needs of the individuals that we serve and their communities. CTRCs offer person-centered comprehensive services in a supportive learning environment to individuals with disabilities to increase independence and employment in the competitive labor market. Services offered at CTRCs are individualized based upon employment outcomes that are consistent with the customer's individual strengths, resources, abilities, capabilities and informed choice.

To achieve this transformation, the Division of Rehabilitation Services is embarking on a 4-year strategic plan (2020-2024) to transform the Vocational Rehabilitation Program and revolutionize the customer experience. Focusing on the customer and the customer experience, the goal of the transformation is to create an environment where individuals and business served, along with VR staff and partners feel welcome, informed, and encouraged.

By the end of this transformation, the goal of the Division is to ensure that:

- VR is responsive, welcoming, informative, and encouraging showing individuals and businesses what is possible.
- Businesses seek out VR services to transform their operations and meet their workforce needs and ultimately improve their bottom line.
- CTRCs are transformed into community-based resource centers offering community-based employment training and connecting VR and non-VR customers to education, training and employment resources.
- Pre-ETS are coordinated, collaborative, connected services that prepare students with disabilities for a seamless transition to life after high school.

The Division has identified 5 strategic priorities as outlined below.

Strategic Priorities:

1. Communication - Foster trust and credibility with internal and external stakeholders through reliable, accurate, transparent, and timely two-way communication.
  - a. Create and tell a clear story of the Division's work, priorities, and successes
  - b. Encourage safe and respectful workplace communication with mechanisms for staff to know priorities and express concerns
  - c. Enhance transparency and responsiveness by encouraging open dialogue with stakeholders
  - d. Guarantee staff at all levels embrace stakeholder input and feel responsibility and ownership for partnerships and collaboration

1. Leadership and Talent Management - Support a professional workforce that is organized and structured to deliver high quality vocational rehabilitation services through effective teams.
  - a. Advance a culture of high performance through professional development and accountability
  - b. Recruit, develop, retain and recognize quality employees and equip them to deliver high quality service through continuous coaching and training
  - c. Sustain efforts through staff retention and thoughtful succession planning
  
1. Modernization of Systems and Processes - Implement integrated systems and business processes that promote operational efficiency and programmatic effectiveness focused on the customer experience.
  - a. Draft Division business model that supports the department's mission, vision, and core values
  - b. Implement a case management system that empowers staff, customers, and providers with access to information
  - c. Confirm Division policies reflect a strengths-based and person-centered philosophy
  
1. Revolutionize Service Delivery - Build innovative and effective service delivery models to better support businesses and individuals with disabilities in driving the achievement of their employment goals.
  - a. Identify and implement evidenced-based models that lead to increased employment outcomes for individuals with disabilities
  - b. Support Tennessee businesses in meeting their workforce needs with job ready workers
  - c. Prepare students with disabilities for successful transition from high school to adulthood
  - d. Foster understanding with our partners about common goals, shared responsibilities and desired outcomes
  
1. Data Driven Services and Outcomes - Achieve improved employment outcomes for people with disabilities through data driven rehabilitation services and employment initiatives.
  - a. Enhance capacity of staff to use and analyze data to inform and improve practice and outcomes
  - b. Advance the integration of data systems with other resources as appropriate to facilitate innovative service delivery and collaboration

- c. Share program data and outcomes with stakeholders to create an environment that promotes continuous quality improvement

Specific Actions that VR will be taking over the next four years:

- Continued implementation of the new case management system, Aware (target implementation date June/July 2021).
- Review of revision of VR policies and procedures to ensure alignment with the Division's mission, vision, and values – included a renewed emphasis on person-centered practices.
- Statewide implementation of person-centered training for all staff.
- Design and development of the plan to transform the 17 Community Tennessee Rehabilitation Centers based on the findings and recommendations of Synergy Consulting partners.
- Assess and evaluate the Division's approach to professional development including an update and re-design of new counselor training, general staff on-boarding and other professional development opportunities for staff on an ongoing basis.
- Assess and evaluate the Division's staffing to include a review of position classification and compensation for alignment with the roles and responsibilities of a modernized, community-based vocational rehabilitation program.
- Improve and expand the opportunities for customer engagement throughout the vocational rehabilitation process, gathering feedback and input from VR customers at various points throughout their employment journey.

## 2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis

Providing assistive technology resources to customers throughout their time working with VR is an important part of their journey to successful employment. The division takes that responsibility very seriously and uses multiple methods to assure that customers have the knowledge, skills and access to the tools that they need. Many of those services including assessments, training, device fabrication, job-site evaluations along with those support services required for successful use of assistive technology is provided through comprehensive contracts with uniquely qualified providers who have the staff required to provide those services. These providers provide both on-site and facility based services that are individualized and comprehensive including the generation of a detailed report and set of recommendations that are directed by the customer and provide the customer and counselor a road map for what technology might be needed at each stage of their journey.

While customer needs may be evolving, examples of key times that customers and counselors are encouraged to consider incorporating the topic of AT into the discussion include: at the beginning of the case, prior to any transitions, when determining general access needs (such as computer access) before specific jobs are determined, when preparing for educational opportunities, prior to obtaining employment, when considering job site assessments, and in supported employment settings. Training will emphasize the diverse needs of customers and the potential need to reevaluate AT at different times during the journey to employment.

To increase the knowledge and familiarity of ever-changing technology the division includes contracted AT providers in regional meetings to share information on requested topics related to AT and implementation strategies. Ongoing training enhances AT awareness for both experienced and new staff. VR regional directors also meet quarterly with AT provider leadership to ensure open dialogue about referrals, customer concerns, AT questions and staff needs.

The state AT Act Program, the Tennessee Technology Access Program (TTAP), is not just a close partner, but share the same lead agency in the state. As a result, the two programs work in collaboration to serve the whole AT needs of clients beyond those just related to employment. One example of this close partnership is the utilization of TTAP's device loan program. In partnership with TTAP and the AT providers shared by each program, VR customers may borrow devices to decide if a device is appropriate, for training, while waiting on equipment approval or for personal use.

### **3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program**

According to the comprehensive needs assessment that the division conducted in 2019, immigrants, American Indian or Native American, Asian or Pacific Islander, and the Offender reentry populations were identified by survey respondents as those most "unserved" in Tennessee. Additionally, survey respondents identified rural residents, limited English proficiency, Hispanic or Latino, Offender Reentry, and Individuals with substance abuse as those most "underserved" in Tennessee. When asked for ideas on reaching these unserved and underserved populations, respondents to the needs assessment identified the need to continue working with existing partners, but also to establish partnerships with local community centers, libraries, faith communities, or any place where these unserved and underserved populations might regularly gather in an effort to meet these populations where they are. Division staff are working diligently to establish these types of community partnerships to identify and reach these unserved and underserved populations on a continual basis.

In addition to reaching out to unserved or underserved populations, the division consistently works on improving its overall outreach and communication to all Tennesseans who would benefit from the VR program. Since 2016, the DHS Director of Communication and Press Secretary both have become active members of the Employment First Communicators Work Group. The work group brings together those who serve in communications roles of Employment First Task Force member organizations to brainstorm, collaborate and strengthen communication strategies for disability employment initiatives. The group routinely promotes success stories, collaborative services, social media campaigns (#hiremystrengths), and efforts to gather stakeholder insights and education. Through this work, VR has had a greater presence on social media and is improving its outreach across the state.

Lastly, to engage those individuals with the most significant disabilities, the division has expanded its partnership with Disability Pathfinder, an organization housed at Vanderbilt University's Kennedy Center, providing free information, resources, support, and referrals to Tennesseans with disabilities and their families.

### **4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students**

from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services)

Response provided in section o.1 above.

## **5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State**

Response provided in section o.1 above.

## **6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA**

The division has identified several strategies to increase program performance accountability measures over the next several years. In addition to implementing a new case management system, scheduled to go-live by June 2021, the division is working closely with one of our WIOA core partners, Department of Labor and Workforce Development (DLWD), to create new ways of sharing data between the two divisions. As part of the new case management system, a direct interface will be established between VR and DLWD to share post-exit quarterly wage data. This will simplify the data exchange and provide the most updated customer information to ensure performance accountability. Additional interfaces to share relevant program data are also being explored with the Department of Labor as the two workforce partners collaborate to identify streamlined methods of data sharing and ways to increase inter-agency cooperation.

Additionally, the division has recently signed on to the State Wage Interchange System data sharing agreement, allowing the division to collect interstate quarterly wage information, thus providing the division with additional information to assess performance accountability.

Lastly, the division conducts quarterly assessments of the measurable skill gain rate. To improve performance on this measure, the division has implemented staff training on documentation and validation of MSGs in the current case management system. To date, these efforts have resulted in improved accuracy of reporting and a 5% increase in the MSG rate from quarter 1 to quarter 2 of PY 2019. The division has completed the MSG rate negotiation process with RSA for PY 2020 and 2021 and will continue working to improve performance on this measure.

## **7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities**

Response provided in section o.1 above.

## **8. How the agency's strategies will be used to:**

**A. Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;**

Members of the Tennessee State Rehabilitation Council extensively reviewed all recommendations received through the VR Comprehensive Needs Assessment to determine what VR leadership and staff should prioritize for program improvement over the next three to four years. Through that process, they identified seven top priorities, including:

#### #1 – Talent Management – hiring, training, retention, and fair compensation

Across almost all the respondents to the VR Needs Assessment, staff turnover was identified as a major issue affecting VR service delivery. Not only is turnover seen as a disruption in provision of service, but it affects the relationship and trust that customers have in the VR program. It was recommended that VR try its best to maintain seasoned staff to help ensure continuity of services.

#### #2 – Communication and Responsiveness

Across the board, improvements in communication and responsiveness were cited as areas that VR needed to improve upon. Survey responses noted, communication, both internal and external, are critical to fostering trust and credibility with internal and external stakeholders. Recommendations for reliable, accurate, transparent, and timely two-way communication were consistent throughout the surveys.

#### #3 – Timeliness of Services

According to the VR survey, while CRPs were overall satisfied with timeliness and responsiveness of the VR staff that they coordinated service delivery with, Customers and Caregivers were not. This is a significant difference that must be explored fully. Customers and caregivers specifically recommended that VR ought to look at improving the length of time it takes to obtain assistive technology, improve response time, and improve upon follow-up time.

#### #4 – Customer Engagement

Active participation of customers throughout their VR case enabling them to practice informed choice through the process, including development of the Individualized Plan for Employment was a common theme identified in all surveys. Rooted in the Vocational Rehabilitation program's emphasis on INDIVIDUALIZED services – the VR customer must be an active and engaged participant. VR customers must be included in the decisions that are affecting their lives. This includes the selection of services and service providers that best meet the needs of each customer.

#### #5 – Transportation

Transportation was identified as a major barrier impeding individuals with disabilities from obtaining employment in the community. Specifically, it was noted as a major impediment to those individuals who were identified as chronically unserved or underserved and as a major impediment in rural areas. This is a barrier that VR is not facing alone. Transportation is continually cited as one of the largest barriers affecting individuals with disabilities, seniors, low-income individuals, and those in rural areas. It will be critical for VR staff to continue to work with their partners on identifying creative solutions and looking for opportunities to collaborate with new and existing partners across the state to address this barrier.

#### #6 – Community Partners and Resources

Each of the surveys identified opportunities for VR to create community resources that make it easier for the public to understand what services are available to them. Additionally, while WIOA Partners who took the survey reported that they understand what role their organization plays in meeting the requirements of WIOA and that the WIOA State Combined Plan serves as a guiding document for their organization; they don't necessarily understand the role that all other TN WIOA partners play. In

addition to community resources, creating cross-agency resources that allow sharing of relevant data, reporting measures, and the ability to jointly monitor progress toward outcome-based results were all cited as recommendations.

#### #7 – Pre-Employment Transition Services

As was referenced earlier, Pre-ETS providers, educators, and parents all feel that youth with disabilities do and could greatly benefit from Pre-ETS services. The disconnect revealed in the Pre-ETS Needs Assessment is ensuring that those who need the services know about the services. Communicating and informing the public, schools, youth, parents, and stakeholders about Pre-ETS services is something that the division has been and will continue to address.

Building on these recommendations, the Division of Rehabilitation Services is embarking on a 4-year strategic plan (2020-2024) to transform the Vocational Rehabilitation Program and revolutionize the customer experience. Focusing on the customer and the customer experience, the goal of the transformation is to create an environment where individuals and business served, along with VR staff and partners feel welcome, informed, and encouraged.

To achieve this transformation, the division has identified the following five strategic priorities:

##### Strategic Priorities:

- Communication - Foster trust and credibility with internal and external stakeholders through reliable, accurate, transparent, and timely two-way communication.
- Leadership and Talent Management - Support a professional workforce that is organized and structured to deliver high quality vocational rehabilitation services through effective teams.
- Modernization of Systems and Processes - Implement integrated systems and business processes that promote operational efficiency and programmatic effectiveness focused on the customer experience.
- Revolutionize Service Delivery - Build innovative and effective service delivery models to better support businesses and individuals with disabilities in driving the achievement of their employment goals.
- Data Driven Services and Outcomes - Achieve improved employment outcomes for people with disabilities through data driven rehabilitation services and employment initiatives.

Each of the strategic priorities listed above can be linked to one or more of the seven recommendations identified in the comprehensive needs assessment. Strategic plans to improve communication will incorporate recommendations 2 and 6. The division's focus on talent management will target key action steps to address recommendation 1. And the strategic plans to modernize systems and processes, revolutionize service delivery, and provide data driven services and outcomes will be built around recommendations 3, 4, 5, and 7.

#### **B. Support innovation and expansion activities; and**

Response provided in section o.1 above.

#### **C. Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.**

Response provided in section o.1 above.

## p. Evaluation and Reports of Progress: VR and Supported Employment Goals

Describe:

1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals

The goals and priorities for the VR program described in the approved VR services portion of the Combined State Plan for the most recently completed program year were:

Goal 1. Continue Increasing Successful Employment Outcomes

Objective 1.1:

A. Increase Successful Employment Outcomes by 2% or more annually over the next 4 years. The opportunity exists to reinvigorate historical referral sources. This effort will include development of marketing initiatives for use in local areas for community outreach as well as joint efforts for partners listed below but not limited to:

- All agencies as required in the Combined State Plan
- Tennessee's Department of Labor and Workforce Development
- Department of Economic and Community Development
- Department of Intellectual and Developmental Disabilities
- Department of Children's Services and Department of Mental Health and Substance Abuse Services
- Chambers of Commerce
- Tennessee Works Partnership
- TennCare

The Division will develop strategies for increasing referrals of Pre-Employment Transition Services (PRE-ETS) through local education agencies. Special focus will include the identification of any underserved population at the regional level.

Progress: The Vocational Rehabilitation program continues to strive to increase successful employment outcomes. Despite continuing efforts to market and outreach through the identified partners, PY 2017 and PY 2018 saw a decrease in the number of successful closures. As reported in other sections of the report, the Division has continued and expanded its work with state partners, including new memorandums of understanding and interagency agreements with TennCare and the Department of Education. Additionally, VR has increased both pre-employment transition services and transition school to work opportunities through grant contracts with local education agencies.

B. Action Steps to establish a stronger focus on employment related activities include:

Fully staff the Agency: Increase visibility and engagement of the Agency's Business Services Unit for regional and statewide activities;

1. Building a comprehensive network of employment resources across the state;
2. Implementing services to employers promoting the value of the Division and the hiring of people with disabilities;
3. Maintain the current Community Rehabilitation Provider monitoring process to ensure effectiveness and efficiency;
4. Develop/disseminate surveys to determine adequate training needs of service providers (new and seasoned staff)
5. Maintain the monitoring and expansion of contracts related to Business Initiatives (ex. CLEE)
6. Continue to work collaboratively with and provide greater technical assistance to the Workforce Investment System. The program will continue to have counselors co-located in each of the State's Local Workforce Investment Areas' comprehensive career centers and to provide itinerant counselors to serve all satellite career centers.

Progress: In 2017, Vocational Rehabilitation centralized the leadership and reporting structure of the Business Service Unit to align with the Workforce Innovation and Opportunity Act. The unit models the dual customer approach, recognizing that VR must serve clients and engage businesses. There is an increased and intentional focus that extends beyond finding job vacancies and sharing them with clients to learning and understanding employer needs and ensuring VR training and clients can meet those needs. The unit's goal is for business to see VR as a source for diversifying their workforce and providing qualified candidates for their vacant positions. This work was increased and expanded in 2018 and 2019 with the addition of area managers to each grand division of the state. Examples of this work can be found in Section G.

To continue to work collaboratively with and provide greater technical assistance to the Workforce Investment System, the VR program conducted site reviews of the American Job Centers (AJCs) across the state to assist with building and program accessibility. Additionally, Vocational

Rehabilitation Counselors are assigned to AJCs 2 to 3 days a week and other counselors rotate and use the space provided by the AJCs regularly. Finally, in 2018 and 2019 VR participated in the Employment First State Leadership Mentoring Program (EFSLMP) through the Office of Disability Employment Policy with our state colleagues from the Department of Intellectual and Developmental Disabilities and the Department of Mental Health and Substance Abuse with a targeted focus to ensure American Job Center (AJC) staff members are equipped with the expertise and resources to effectively serve individuals with significant disabilities in obtaining competitive integrated employment.

#### Objective 1.2:

The Program will continue to monitor expenditures and available resources to determine sufficiency of releasing and/or opening Categories 3 and 4.

Progress: The Division continues to monitor expenditures and available funding to determine if there is sufficient funding to release Category 3 and 4.

#### Goal 2. Improve Efficiency and Effectiveness in Client Services Delivery System

- Throughout the SFY, Vocational Rehabilitation will achieve a monthly timeliness rating of 92% for the determination of eligibility with the inclusion of extension agreements per policy. Determination of eligibility within 60 days.
- Throughout the SFY, Vocational Rehabilitation will develop the Individualized Plan for Employment within 90 days unless there is an agreed upon extension between the client and counselor. A timeliness rating of 90%.
- Meet with core partners to develop goals around the new federal standards and indicators regarding wages.

Progress: The Division continues to monitor timeliness of eligibility determinations and development of the Individualized Plan for Employment (IPE). Monthly rates have consistently exceeded the established performance metrics of 92% and 90% respectively. The Division continues to increase timeliness goals to ensure individuals are receiving needed services timely.

#### Objective 2.2:

- Research prevailing wages for various industries

Progress: In 2018, the department established the baseline hourly wage for VR customers at an average of \$10.29 per hour at the time of closure. Based on this baseline, a performance goal for all staff was established to have 50% of their cases earning more than \$10 per hour.

#### Objective 2.3:

- Research, develop, and implement strategies to increase the awareness and accessibility of client satisfaction surveys
- Achieving an 80% or higher satisfaction rating for the vocational rehabilitation program as reported by the consumer satisfaction survey program for successful outcome closures
- Continue to increase staff knowledge in rehabilitation practices through on-going training.

Progress: Based on the statewide comprehensive needs assessment, the Division has room for continued improvement in the area of customer satisfaction. Sixty-five percent (65%) of respondents to the Customers and Caregivers survey believed that the services offered by VR met their needs. However, there was a slight difference when respondents were asked if they believed that their participation in the VR program left them feeling more confident in their ability to work in the community. Only 60% of respondents agreed that they were more confident in their ability. This is a continued area of focus for the Division and customer engagement and satisfaction will play a central role in the Division's transformation.

#### Objective 2.4:

Ensure access to VR documents, materials and training for clients, citizens, and staff:

1. The Program will ensure that all documents and materials are available in alternate formats.
2. The Program will ensure that timely requests are made when qualified interpreters are needed or requested
3. The Program will create VR marketing materials to accommodate individuals with sensory disabilities
4. The Program will research, develop, and implement a marketing plan to educate the community about VR services.
5. Meet with Disability Pathfinder to identify needs and engage diverse populations

Progress: The Division ensures that all documents and materials are available in alternate formats as needed and requested, makes timely requests for interpreters as needed or requested, creates marketing materials to accommodate individuals with sensory disabilities, and is working with state and community partners to educate the community about VR services. Through our partnership with TTAP, the VR program works to ensure that all state and vendor materials are accessible. Additionally, the VR program has established a separate delegated authority for providing accommodations to those applicants who have not yet been determined eligible to make providing interpreters much more efficient.

### **B. Describe the factors that impeded the achievement of the goals and priorities**

Overall, the Division has experienced considerable success in achieving the VR and Supported Employment goals outlined above. However, despite this success, some goals and priorities were not fully achieved. The primary factors contributing to these challenges included staffing and legacy data systems.

- Staffing - As noted in section (i), the number of higher education programs in the State that are preparing VR professionals has decreased to one (1). This program currently has 26 students enrolled. At this enrollment rate, the program is not producing a sufficient supply of qualified graduates to fill the Division's vacancies. Additionally, the statewide needs assessment noted, across almost all the respondents, staff turnover was a major issue affecting VR service delivery. Not only is turnover seen as a disruption in provision of service, but it affects the relationship and trust that customers have in the VR program. As a result, the Division has placed talent management, including the recruitment and retention of qualified staff, as one of its top 5 priorities in its 4-year strategic plan. Over the next four years, the Division will be working to support a professional workforce that is organized and structured to deliver high quality vocational rehabilitation services through effective teams by advancing a culture of high performance through professional development and accountability; recruiting, developing, retaining and recognizing quality employees and equipping them to deliver high quality service through continuous coaching and training; and sustaining efforts through staff retention and succession planning.
- Legacy data systems – As noted throughout the state plan, the Tennessee Department of Human Services (TDHS) – Vocational Rehabilitation (VR) is under contract with Alliance Enterprises, Inc. to replace VR's current legacy case management system, TRIMS, with a new system, Aware, that is federally compliant and supports the changes required by WIOA. The new system will provide staff with a more efficient, user-friendly system that supports WIOA reporting requirements and a variety of vocational rehabilitation program case types, including traditional VR cases, Independent Living (IL) cases, Independent Living Older Blind (ILOB) cases, Potentially Eligible (PE) cases, and allows for staff of Community Tennessee Rehabilitation Centers (CTRCs) and TRC Smyrna to access and store essential case information in one comprehensive case management system. The system is scheduled to go-live in June 2021. The new system will simplify data collection and report generation for staff, allowing for greater transparency and access to program-related data. The system was chosen in part because it is scalable and agile enough to implement changes to data collection and reporting in a timely manner and is designed to identify and easily collect all data field required by the VR Service Programs federal partners, the Rehabilitation Services Administration (RSA). The system also permits budgeting, facilitates fiscal transactions through external systems, and provides statistical and management report generation in accordance with the applicable state and federal regulations, particularly WIOA. It also has the capability of accepting and storing program documentation and generation of all federal reports, as well as division-specific reports, allowing the VR Program the opportunity to collect and accurately report on crucial program data. VR staff are currently nine months into the implementation of a new case management system. The target go-live date is June 2021. The system will empower staff, customers, and providers with access to information that is not always easy to access within our current system, including better and more accurate information related to various timelines within the lifecycle of a VR case, including referral, application and service delivery dates. The new case management system that the VR program is currently implementing will allow VR staff to survey customers regarding services received, one tool that will help Division leadership better understand the impact of services being delivered. Additionally, Division leadership is looking at ways to further engage stakeholders, such as the Centers for Independent Living, Client Assistance Program, the Parent Training and Information Center, The Arc Tennessee, Disability Rights Tennessee,

and the Council on Developmental Disabilities, among others, in efforts related to customer engagement and self-advocacy.

## 2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:

### A. Identify the strategies that contributed to the achievement of the goals

Response provided in section p.1.A above.

### B. Describe the factors that impeded the achievement of the goals and priorities

Response provided in section p.1.B above.

## 3. The VR program's performance on the performance accountability indicators under section 116 of WIOA

Response provided in section p.1.A above.

## 4. How the funds reserved for innovation and expansion (I&E) activities were utilized

Innovation and expansion activities remain central to the Division's achievement of its goals and priorities for both VR and Supported Employment. Two key endeavors include the Division's partnership with the University of Tennessee, Center for Literacy Education and Employment (UT CLEE) and Vanderbilt University's Kennedy Center.

The innovation and expansion work of UT CLEE focuses on two primary areas. First, three regional UT CLEE Training Coordinators provide professional development services through training and technical assistance support for community rehabilitation service providers. Each month training sessions are offered across the state for newly hired employment service providers. The Training Coordinators conduct training in classroom settings to review and define employment services including: 1) Overview of the Workforce Innovation and Opportunity Act and Competitive Integrated Employment; 2) Vocational Assessments; 3) Job Readiness/Job Placement; 4) Job Coaching; 5) Supported Employment; and 6) Customized Employment. Field work is assigned to the newly hired employment services staff to provide them with practical experience in areas of vocational assessment, job coaching and job developing. The newly hired staff return to the classroom for a second session to share field experiences and discuss best practices. In addition, UT CLEE offers monthly continuing education workshops across the state, highlighting best practices to enhance the skills of employment service providers. Second, four regional UT CLEE Business Coordinators support the work of the Division with businesses through the coordination of targeted marketing, delivery of human resource services, and the development of new initiatives to increase employment opportunities for qualified job candidates with disabilities. Business Coordinators conduct training for businesses on topics such as Disability Awareness/Etiquette, Business Incentives, Job Accommodations, etc. Working under the guidelines of the Workforce Innovation and Opportunity Act, partners collaborate within the community to better serve the business customer. Business

Coordinators work to engage Division staff in these activities, along with providing staff professional development through training and technical assistance.

Additionally, the state has partnered with Vanderbilt University and the Vanderbilt Kennedy Center to develop an on-line portal on the Transition Tennessee website that focuses specifically on Pre-Employment Transition Services. Launched in spring 2019, this website expands the state's capacity to provide high-quality, evidence-based pre-employment transition services that lead to successful post-secondary and employment outcomes for students with disabilities. The Transition Tennessee Pre-ETS Blueprint serves as an online hub for professional development and resources on Pre-ETS and offers guidance on the components of Pre-ETS to assist providers in delivery of these services. This new portal includes two courses on the foundations of Pre-ETS: 1) The Power of Early Work Experiences and 2) Overview of WIOA and Pre-ETS. Each course features free video modules, downloadable resources, webcasts, and information about upcoming conferences and trainings. Additional courses will be added that focus on Interagency Collaboration, Connecting with Employers and Families, the Student-Centered Approach to Transition Instruction, and each of the five pre-employment transition services.

Innovations and expansions such as these will continue to serve the Division's customers well into the future and provide a solid foundation for additional growth and development.

## **q. Quality, Scope, and Extent of Supported Employment Services**

Include the following:

### **1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities**

The Division continues to provide supported employment services to eligible individuals with the most significant disabilities who have been determined by the Division to require supported employment services and extended and on-going support services in order to obtain and maintain competitive integrated employment in accordance with 34 CFR § 361.5(c)(9), 34 CFR § 361.5(c)(19), 34 CFR § 361.5(c)(37), 34 CFR § 361.5(c)(53), and 34 CFR § 363.

It is the continued goal of the Division to provide quality supported employment services which are delivered in an effective, efficient and timely manner. Supported employment services are provided by preferred Community Rehabilitation Providers approved by the Division and in collaboration with programs developed by the Departments of Intellectual and Developmental Disabilities (DIDD) and Mental Health and Substance Abuse Services (DMHSAS), and by the Division of TennCare (TN's Medicaid program).

Beginning October 1, 2019, the Division discontinued the use of Letters of Agreement with Community Rehabilitation Providers (CRPs) for the provision of supported employment services. The Division has implemented an approval process that selects CRPs based on staff experience and training. CRP Employment Specialists training may be provided through the Association of Certified Rehabilitation Education (ACRE) or Employment Specialists certification by obtaining a Certified

Employment Support Professional (CESP) certification or Certified Rehabilitation Counselor certification. Tennessee CRPs have been proactive in securing the CESP certification with over 225 reported staff that have obtained CESP certification.

The number of individuals who are provided supported employment services continues to increase. From PY2016 to PY 2018 supported employment services has increased nearly 20%. This upward trend is expected to continue due to improvements with community rehabilitation providers and to better partnering and collaboration with other state, profit and non-profit agencies.

Eligible individuals are assessed by VR Counselors to determine if extended and on-going support services are needed to support an individual with the most significant disability in competitive integrated employment. Individuals are then referred to approved CRPs for the development and provision of supported employment services and extended and on-going supports (including natural supports).

Interagency agreements have been signed and implemented that provide for the following partnerships and collaboration:

- The agreement with the DMHSAS provides collaboration in the use of evidence based Individual Placement & Support (IPS) supported employment in assisting individuals with mental illness and co-occurring disorders of alcohol and drug abuse to obtain and maintain competitive integrated employment. The Division has 11 preferred CRPs that can provide IPS SE services and more are expected to be added in the coming year.
- The agreement with the Division of TennCare, Long Term Services and Supports, provides for the provision of supported employment services for persons enrolled in the Employment and Community First (ECF) CHOICES program who have intellectual or developmental disabilities. Beginning in July 2016, Tennessee, through the ECF CHOICES program, became the first state in the country to develop and implement an integrated, home and community-based services program, aligning incentives toward promoting and supporting integrated, competitive employment and independent living as the first and preferred option for individuals with intellectual and developmental disabilities. The agreement intends to ensure that services are coordinated, seamless, and efficient. The Division and TennCare coordinated training efforts to implement the agreement requirements and continue coordinated efforts for the provision of services and technical assistance.

The Division has implemented a pilot program utilizing IPS SE services for individuals with mental illness who are receiving Temporary Assistance for Needy Families (TANF). The Division and TANF share in funding the services.

IPS has become a promising SE program for individuals with mental illness who may also have other diagnoses. The Division is exploring, in collaboration with the DMHSAS and DIDD, providing IPS SE

for individuals with dual diagnoses such as, intellectual or developmental disabilities and mental illness. The Division is identifying preferred CRPs who work with DIDD/ECF CHOICES providers. A pilot program with one mental health provider has been implemented to learn more about the applicability of IPS SE for individuals with dual diagnoses.

The Division, along with DMHSAS, DIDD, Department of Labor and Workforce Development, Department of Education and the Division of TennCare, has committed to participating in the expansion of the Individual Placement and Support (IPS) services through application for the U.S. Department of Labor (DOL), Office of Disability Employment Policy's (ODEP's) Visionary Opportunities to Increase Competitive Employment (VOICE) grant. The Application requests 200 hours of technical assistance to expand IPS Services statewide, to provide collaboration on opportunities, resources and training to mental health and DIDD providers statewide to effectively support individuals with dual diagnoses (I/DD and mental illness) who want to pursue competitive integrated employment and to provide resources and guidance to develop cross-training for American Job Center staff to effectively support people with disabilities, including veterans and people with behavioral health diagnoses.

The Division has contracted with the University of Tennessee, Center for Literacy, Education and Employment to develop training for CRPs to ensure competency and compliance with the Divisions' requirements for SE services and on how to develop natural supports (employer, supervisor, co-worker, family member) to address extended and on-going support services where funding is not available from another Agency.

The number of supported employment CRPs has increased over the past year from 75 to 87. The Division continues its efforts to increase SE CRPs and expects the number of CRPs will increase. The Division is actively pursuing CRPs for underserved areas across the state and for rural and distressed counties. The Division will continue with and seek new partnerships and collaboration with appropriate state agencies and with private and/or non-profit agencies which have the capabilities of providing quality SE service delivery and extended and on-going support services across the state, including those agencies where supported employment services can be provided to persons being transitioned from institutional settings to the community and competitive integrated employment settings.

For PY 2019 the Division expects to serve in excess of 1,840 individuals through the supported employment program. The Division has consistently closed about 22% of the supported employment cases in successful employment annually. This calculates to approximately 406 successful outcomes for PY 2019.

As mandated, the Division has set aside applicable VR funds for extended services for youth with the most significant disabilities who require supported employment but whose extended services are not funded by other entities or sources.

The Division has established appropriate services, trained service providers, and defined the criteria for extended and on-going support services that will be provided for youth with disabilities.

Extended services may be provided for a youth with a disability for up to four (4) years or until the client turns twenty-five (25) years of age, whichever comes first. Extended services for youth may be funded by another state agency or other client resources, such as a Social Security PASS or IRWE; provided by natural supports; or funded by VR provided there are no other means of funding for providing the extended services and the youth has not declined VR providing extended services. If VR funds extended services for a youth with a disability, the case cannot be closed until the time period for providing extended services ends.

For the provision of extended services to youth with disabilities who received supported employment services, the Division will continue to collaborate and find partnership opportunities with DIDD, DMHSA, Department of Education, and other entities to continue outreach to transition students that may need supported employment.

The Division will work with the Department of Education through the Pre-Employment Transition Services program to provide work experiences that can assist and provide transition students with a more positive and encouraging employment experience.

The Division expects to continue increasing competitive integrated employment opportunities for individuals with severe mental illness, including those with co-occurring disorders of alcohol and drug abuse by expanding more effective partnerships with mental health entities through the evidenced based Individual Placement and Support (IPS) Supported Employment Services.

The Division is currently in discussion with TennCare and other partners who are supported by TennCare, to identify ways to further align policies and funding that would allow supported employment services to be provided to a broader population.

The Division will continue to work with CRPs, managed care organizations (Amerigroup, BlueCare, and United Health Care) and other entities to review policies, training, identify improvements and best practices for the ECF CHOICES program.

The Division will continue to work with disability specific stakeholders and advocacy groups such as the Autism Society and chapters of The Arc in Tennessee in conducting collaborative meetings to help identify sources of support.

The Division will continue to work with the mental health community for expansion and sustainability of the Individual Placement and Support SE services.

The Division will continue to encourage CRPs to become Employment Networks as possible funding sources for extended and on-going support services. The Division will continue to train CRPs and VR staff to increase usage of SSA PASS plan and other work incentive programs.

The Division will assure that funds made available will only be used to provide Supported Employment services to individuals who are eligible to receive such services.

The Division's case management system can identify SE cases and service expenditures as required by the RSA.

## 2. The timing of transition to extended services

The Division coordinates with other state agencies and the community rehabilitation providers to transition individuals receiving supported employment services to extended and on-going support services. An individual is moved to extended and on-going support services when the client has reached a point where he/she has achieved maximum performance on the job; has achieved minimum necessary supports on the job; the job is not in jeopardy of ending; and the individual is maintaining work performance which is acceptable to the employer and the individual.

## Vocational Rehabilitation (Combined or General) Certifications

States must provide written and signed certifications that:

1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA[14], and its supplement under title VI of the Rehabilitation Act[15];

Enter the name of designated State agency or designated State unit, as appropriate

Designated State Agency - Department of Human Services

Designated State Unit - Division of Rehabilitation Services

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency)[16] agrees to operate and administer the State VR Services Program in

accordance with the VR services portion of the Unified or Combined State Plan[17] , the Rehabilitation Act, and all applicable regulations[18] , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

Enter the name of designated State agency

Department of Human Services

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[19] , the Rehabilitation Act, and all applicable regulations[20] , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

7. The (enter the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

Enter the name of authorized representative below

Danielle W. Barnes

8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

Enter the title of authorized representative below

Commissioner, Department of Human Services

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

## Footnotes

[14] Public Law 113-128.

[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.

[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[20] Applicable regulations, in part, include the citations in footnote 6.

## Certification Signature

Signatory information	Enter Signatory information in this column
Name of Signatory	Danielle W. Barnes
Title of Signatory	Commissioner, Department of Human Services
Date Signed	March 2, 2020

## Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:**

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
3.b.(A) "is an independent State commission" (Yes/No)	No

The State Plan must include	Include
3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	Yes
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	No
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is	

The State Plan must include	Include
present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	No
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act	
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	

The State Plan must include	Include
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act	
7. Provision of Supported Employment Services:	Yes
7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

## Vocational Rehabilitation Program Performance Indicators

### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those

under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	20.0%	23.0%	25.0%	26.0%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

## VII. Program-Specific Requirements for Combined State Plan Partner Programs

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program—and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. 24 If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

[24] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

### Temporary Assistance for Needy Families (TANF)

States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

(OMB Control Number: 0970-0145)

a. Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act)

In conformance with Section 402 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193), the Tennessee Department of Human Services (TDHS) shall administer and supervise the Temporary Assistance for Needy Families (TANF) Program, known as the Families First (FF) Program in Tennessee.

Cash assistance payments are made on a monthly basis for all Families First/TANF eligible assistance groups using a standardized budgeting and payment method per assistance group size.

TDHS has a gross income test, a consolidated standard of need, and a maximum standard payment amount per assistance group size. The gross income standard is based on one hundred eight-five (185%) percent of the Consolidated Need Standard (CNS), which is calculated and submitted to the Department yearly by a contract agency. Some assistance groups receive a higher differential maximum payment amount, based on caretaker work exemptions. Disregards include a two hundred fifty dollars (\$250.00) earned income disregard, a mandatory household member and income disregard for a three(3)-month period beginning with the month following the month of marriage for new spouses (marriage during receipt policy), and child care disregards of two hundred dollars (\$200.00) per month for children under two (2) years of age and one hundred seventy-five dollars (\$175.00) per month for children two (2) years of age or older, for parents who choose a deduction rather than having their child care paid directly to the provider by TDHS.

Non-assistance benefits, services or activities aimed to achieve the goals of TANF may be provided to TANF eligible families or other low-income families at risk of receiving TANF.

TDHS will continue to use fill-the-gap budgeting. Current month child support will be paid to the caretaker using the fill-the-gap budgeting method as permitted in Section 302 (e) of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996.

Families First/TANF payments shall be made through Tennessee's Electronic Benefit Transfer (EBT) system to the caretaker, alternate payee, or protective payee. The payment will be made available on the first (1st) of each month for continuously eligible cases. Payments are made from the date the signed Families First/ TANF application is received in the local office for all eligible applicants. Auxiliary payments will be issued to all assistance groups that have been underpaid.

### **Eligibility**

- Eligibility for Families First/TANF cash assistance benefits are determined based on the following criteria:
- The Assistance Unit (AU) lives in Tennessee.
  - The AU includes either:
  - A child under age eighteen (18);
  - A child under age nineteen (19) who is expected to complete high school or an equivalent vocational/technical training on or before his/her nineteenth (19th) birthday;
  - A pregnant woman in her last trimester; or
- The otherwise eligible parents or caretakers of a child receiving SSI.
- The children live in the home of a parent or a relative, within the specified degree of relationship, who maintains care and control of the child.
- All members of the AU are citizens or qualified aliens and have provided a Social Security Number.
- Households meet income eligibility, including an income test and a resource test.

All AUs will be subject to a sixty (60)-month lifetime limit of Families First/TANF cash assistance. Months of Families First/TANF -funded assistance received in other States will count toward the lifetime limit. Those AUs that reach their sixty (60)-month limit and are exempt from the Families

First/TANF work requirement and otherwise eligible may be considered for an extension. No more than twenty percent (20%) of the caseload can be on an extension at any given time.

**b. Require a parent or caretaker receiving assistance to engage in work (defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act)**

Families First/TANF AUs with eligible adults who are not exempt must engage in thirty (30) hours a week of countable work or training activities.

TCA AUs with eligible adults, who are not exempt, must engage in thirty (30) hours a week of countable work or training activities (or a combined 55 hours for two parent households receiving federally funded child care). Although this exceeds the minimum federal requirements, this ensures that the minimum hours are being met and that we have the opportunity to work with each individual and assist them in achieving self-sufficiency.

An Exception to the thirty (30) hours work requirement will be granted to those individuals who require a reduction in activity hours due to an Americans with Disabilities Act (ADA) modification. The federally countable work activities being utilized in Tennessee are:

- Unsubsidized employment;
- Subsidized employment in the public or private sector when funding is available;
- Job Search and job readiness assistance;
- Community Service;
- Work Experience;
- Vocational Education Training;
- Job skills training directly related to employment; and
- Adult Education (education directly related to employment).
- Vocational Rehabilitation

Families First/TANF uses the federal definitions for the countable work activities. AUs with a work requirement will receive cash assistance as long as they comply with program requirements or meet the sixty (60)-month time limit.

All provisions of the Fair Labor Standards Act (FLSA) will apply to Work Experience and Community Service activities, including a maximum number of hours and displacement safeguards. Work Experience is limited to six (6) months and Community Services to three (3) in a calendar year, with some exceptions.

Tennessee is divided into (8) Districts that cover all ninety-five (95) counties across the State for the provision of work activities and supportive services. Effective July 1, 2019, the State will align our workforce services and support areas with the TDLWD and TDECD into 9 regional areas that cover all 95 counties across the State. An Employment and Case Management Services (ECMS) Provider is assigned to each district. After eligibility is determined and a referral is received from the TDHS' district's county office, the ECMS Provider completes an assessment and works with the client to develop an Individualized Career Plan (ICP) and/or Family Empowerment Plan (FEP). The ICP/FEP will outline their specific work requirements according to federally countable work activities and provide supportive services if needed. Families First/TANF clients determined to be ready to engage in part or full-time employment will be immediately placed in work or work-related activities for up to thirty (30) hours per week. After a Families First/TANF client receives twenty-four (24) months of cash assistance, the client is required to engage in work activities, if they are not already participating. This excludes a single custodial parent caring for a child under the age of six (6) who refuses to engage in work requirements and is able to demonstrate an inability to obtain needed child care.

Certain AUs will be exempt from the work requirement based on the following criteria:

- The caretaker is sixty-five (65) years old or older;
- The caretaker is disabled;
- The caretaker is temporarily incapacitated;
- The caretaker is caring for an in-home disabled relative;
- The single parent caretaker is caring for an infant less than one (1) year of age;
- The two (2)-parent household is caring for an infant less than sixteen (16) weeks of age.

**c. Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act). Consistent with the required strategic elements discussed in section II (a)(2) herein, provide a specific analysis of how the State's workforce development activities are addressing employment and training services for parents or caretakers receiving assistance**

The Families First/TANF employs the following strategies to ensure clients are working towards self-sufficiency:

- Adoption of the Two-Generation (2Gen) framework that intentionally focuses on creating services for the parent and child together, to harness the family's full potential and to put them on a permanent path to economic security. The whole-family approach is used to guide services and opportunities for our clients in all aspects of our service delivery through the four (4) key components: education, economic supports, health and well-being, and social capital. The State has established approximately 30 partnerships across Tennessee with governmental and non-governmental agencies to deliver services in a manner that improves

economic security and well-being for low income families and promotes one or more of the four statutory purposes of the TANF program, two of those being: 1) Provide assistance to needy families so that children can be cared for in their own homes; and 2) Reduce the dependency of needy parents on government benefits by promoting job preparation, work, and marriage.

Families First/TANF clients will have goal-oriented time-limited, Individualized Career Plans (ICP) and or Family Empowerment Plan (FEP) that carry them through logical and productive steps to self-sufficiency;

- Sanctions will be imposed when a family fails to comply with the Individualized Career Plan (ICP) and/or Family Empowerment Plan (FEP) without good cause;
- Cash benefits will be limited to sixty (60) months of eligibility in a lifetime, with some exceptions; and
- Families First/TANF clients who become employed and lose cash benefits may qualify to receive transitional child care assistance, transitional cash assistance, and/or transitional Supplemental Nutrition Assistance Program (SNAP) benefits.

Once the goals are established and the client is assigned to work or work-related activities that support those goals, the ECMS Provider and TDHS staff work together to ensure that clients receive the appropriate services while the client is in the program. Although the Families First/TANF program does not establish a target goal set for transitioning clients off of assistance; the client, TDHS staff, and the ECMS Provider work together to establish timeframes for the achievement of goals during the sixty (60)-month time limit.

The Secretary of State was sent a notification from the Governor of Tennessee opting out of the provision to require a Families First/TANF parent or caretaker receiving assistance for two (2) months who are not exempt and who is not employed to participate in community service activity. The State plan requires all non-exempt Families First/TANF clients to have an Individualized Career Plan (ICP) and/or Family Empowerment Plan (FEP).

### ***Transitional Cash Assistance***

Effective December 1, 2018, Transitional Cash Assistance (TCA) is available to an AU with an increase in earned income that exceeds the maximum threshold for their household size. The AU may be eligible for up to six (6) months of the maximum grant allotment for all eligible AU members at the time of TCA approval if the household remains in compliance with TCA eligibility requirements during the six (6) month TCA period.

TCA Eligibility:

- Become financially ineligible for Families First due to an increase in the AU's earned income;
- Meet all other Families First eligibility criteria, as defined in section A;
- Be working at least thirty (30) hours per week. (OR a combined fifty-five (55) hours for two-parent households receiving federally funded child care).

Note: TCA is used as an incentive to the Families First/TANF households. TCA differs from Families First/TANF when 100% of the earned income is excluded for 6 months which allows the household to continue receiving cash assistance.

TCA Work Requirements/Sanctions:

- The AU will be monitored by the Employment and Case Management Services (ECMS) provider during the TCA period. If the AU fails to provide proof of ongoing employment that meets the required work hours, the AU will be referred back to TDHS for case closure.
- If the AU falls below the required hours during the TCA period and fails to engage in additional activities, the cash assistance will be closed.

The customer will be eligible to receive supportive services during the TCA period. The supportive services include child care, transportation, as well as other supportive services facilitated by the ECMS provider.

Once the TCA period ends, the customer may be eligible to receive eighteen (18) months of transitional child care.

All TCA cases will be counted in the work participation rate and will be reported as an open Families First case.

### **Diversion Program**

Tennessee will operate a Diversion program to serve families who are not receiving the Families First/TANF cash assistance but could achieve self-sufficiency and economic security through a lump-sum payment.

An Assistance Unit (AU) must meet all of the following criteria to receive a Diversion payment:

- Families First/TANF program eligibility criteria;
- The Assistance Unit has demonstrated residency in Tennessee for six (6) months;
- The primary caretaker has a recent job history;
- The Assistance Unit does not face any major barriers to employment, such as drug/alcohol abuse;
- The primary caretaker has at least a high school diploma or equivalent; and
- The household is facing a one-time financial need, and the Diversion payment would prevent the ongoing need for Families First/TANF cash assistance. The funds can be used for housing, transportation, child care, or job needs.

The Diversion payment will reduce the temporary cash assistance lifetime limit of sixty (60) months eligibility by the number of months the applicant receives a Diversion payment.

Those who accept the Diversion payment will be ineligible to receive another Diversion payment or Families First/TANF cash assistance during the diversion months of assistance. Employed Diversion recipients may be eligible for twelve (12) months of subsidized child care.

### **Sanctions**

Sanctions shall be applied to all Families First/TANF cases that are not in compliance with their Personal Responsibility Plans. A sanction may result in a percentage reduction in the Families First/TANF cash assistance for failure to provide immunizations, health checks, attend school, or ensure satisfactory attendance and/or progress of school-aged children. Total assistance group ineligibility will be applied if the family fails to cooperate with child support or comply with their Individualized Career Plan (ICP) and/or Family Empowerment Plan (FEP) activities without good cause, which is determined by the TDHS.

## **Other Program Policies**

Families First/TANF AUs have access to child care. AUs with an eligible adult can access Families First/TANF Child Care if they are engaged in countable work and/or training activities and require child care in order to comply with the program's work requirements. In addition, clients who are exempt from a work requirement, but wish to volunteer for work/training activities may have access to child care. There is no co-pay fee.

Certain child-only Families First/TANF cases are eligible for At-Risk Child Only (ARCO) childcare if funding is available.

Former Families First/TANF or Transitional Cash Assistance (TCA) clients who are employed or participating in an approved work and/or educational activity at least thirty (30) hours a week can receive up to eighteen (18) months of Transitional Child Care (TCC) after their Families First/TANF case is closed. The eligibility period for TCC begins the first (1st) day of the month after the Families First/TANF cash assistance ends. There is a co-pay fee for ARCO and TCC.

Families First/TANF AUs will be reviewed annually for continued eligibility.

If a single parent marries during the receipt of Families First/TANF cash assistance, he/she may choose to exclude the new spouse from the AU for three (3) full months, regardless of income. Following the three (3) months, the AU must meet Families First/TANF program eligibility requirements to continue to receive cash assistance.

A Family Cap will be applied when a child is conceived and born during a period of eligibility. It may also be applied to a child born after or during a period of ineligibility, but within ten (10) months of a reapplication month. Exceptions are granted when the birth is the result of rape or incest or when the birth is the first (1st) child born to a minor in an assistance unit.

**d. Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act)**

## **Privacy Provisions**

The rules of the cash assistance programs regarding the use and disclosure of information about clients and families receiving assistance are consistent with the rules that guided the program under Title IV-A of the Social Security Act prior to the enactment of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, thus protecting the rights of individuals and permitting the release of information to programs operating in connection with these programs; i.e., federally funded or federally assisted programs providing cash assistance on the basis of need, appropriate audit, and appropriate local, State, and federal law enforcement officials.

All TDHS staff will have mandatory requirements to participate in the Data Security Awareness Training every year. This training discusses the safeguarding of confidential case file information. Each staff member will be required to view an interactive training presentation, complete a short quiz regarding the training material, and sign an agreement to abide by the rules and protocols as

described in the training material. Failure to participate in the training will result in the user being revoked access. If the TDHS staff does not abide by the confidentiality agreement, they will face disciplinary action.

## e. Establish goals and take action to prevent and reduce out-of-wedlock pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(v) of the Social Security Act)

### Efforts to Reduce Out-of-Wedlock Pregnancies

“What’s the Rush?” is a Statewide initiative of the Tennessee District Attorneys (DA) General Conference aimed at raising awareness of the legal, financial, and social consequences of teen pregnancies Statewide. “What’s the Rush: Don’t be a Teen Parent” Campaign, provides informational videos and pamphlets via the DA’s Website. “What’s the Rush?” printed materials and videos were created for the DAs, Assistant District Attorneys (ADAs) or staff members to use when visiting schools and civic organizations to educate Tennessee’s youth about the consequences of becoming teen parents. These materials may also be provided to health departments, the Department of Human Services, courts, and other State-wide partners.

The Tennessee District Attorneys Conference created the campaign in 2008 in response to the number of court cases involving teen parents throughout the State. The following clause is included in the State of Tennessee’s contract with the DAs:

“A.39 The grantee shall conduct a teen pregnancy prevention campaign with a goal of decreasing the number of child support cases. This program shall target and provide resource materials to every high school and health department in the State. Further, the program shall be promoted, and readily assessable to teens through various means including, but not limited to, a website, billboards, and other outreach efforts.”

## f. Conduct a program designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded to include men (section 402(a)(1)(A)(vi) of the Social Security Act)

### Efforts to Reduce Statutory Rape

The Tennessee Department of Human Services (TDHS) recognizes the correlation between teenage pregnancy and the possible occurrence of statutory rape by men.

- In Tennessee, statutory rape is defined as the unlawful sexual penetration of a victim by the defendant or of the defendant by the victim when:

- The victim is at least thirteen (13) but less than fifteen (15) years of age and the defendant is at least four (4) years but less than ten (10) years older than the victim; or
  - The victim is at least fifteen (15) but less than eighteen (18) years of age and the defendant is more than five (5) but less than ten (10) years older than the victim.
- **Statutory Rape** is a class E felony. Punishment for a Class E felony is a prison sentence ranging from 1-6 years.
- **Mitigated Statutory Rape** is the unlawful sexual penetration of a victim by the defendant, or of the defendant by the victim when the victim is at least fifteen (15) but less than eighteen (18) years of age and the defendant is at least four (4) but not more than five (5) years older than the victim. **Mitigated Statutory Rape** is a class E felony.
- **Aggravated Statutory Rape** is the unlawful sexual penetration of a victim by the defendant or of the defendant by the victim when the victim is at least thirteen (13) but less than eighteen (18) years of age and the defendant is at least ten (10) years older than the victim. **Aggravated Statutory Rape** is a class D felony. Punishment for a class D felony is a prison sentence ranging from 2-12 years.

Local TDHS offices will provide printed material regarding statutory rape to be displayed in TDHS offices; contracted agencies, local schools, and other prominent public places where clients, law enforcement officials, relevant counseling services, and related individuals, including the men who have allegedly committed the crime, can view the material. All Family Assistance staff is required to report knowledge of possible statutory rape and is required to report any kind of child abuse or neglect. TDHS staff will contact the local Department of Children Services (DCS) office and notify a Child Protective Services intake worker of a possible occurrence of statutory rape when an applicant for Families First/TANF program or other programs designed to provide related services is:

- Thirteen (13) years of age but less than eighteen (18) years of age; or
- A parent, legal guardian, or custodian on behalf of such person.

TDHS, in conjunction with the proper authorities, will provide a cooperative effort to develop and implement the plan of action.

g. Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act)

**TANF Electronic Benefits Transfer (EBT) Restrictions Requirements**

Any client or caretaker receiving TANF assistance that participates or allows another to use the client's EBT card in an EBT transaction at an ATM machine or Point of Sale (POS) device in any prohibited business location shall be subject to the following penalties:

- Reimburse the department for the amount withdrawn and used subject to any prohibition in federal law.
- Upon a third or subsequent violation, if permitted by federal law, the person shall be permanently disqualified from receiving public assistance benefits by means of direct cash payment or an electronic benefits transfer access card.

A person or entity subject to a penalty or sanction under this section shall have the right to a hearing pursuant to the Uniform Administrative Procedures Act, compiled in title 4, chapter 5.

TDHS shall designate a protective payee to administer the temporary public assistance grant for the benefit of the assistance unit in the event a client or caretaker is disqualified from receipt of public assistance benefits by means of direct cash payment or an EBT card under this Chapter.

Any person or business entity who allows another to use the client's EBT card in an EBT transaction at an ATM machine or POS device in any prohibited business location shall be subject to the following penalties:

1. One thousand dollars (\$1,000) for the first violation;
2. Two thousand five hundred dollars (\$2,500) for the second violation within five (5) years;
3. Five thousand dollars (\$5,000) for a third or a subsequent violation within five (5) years.

The district attorney general may bring an action to suspend the business licenses and permits of the person or business entity for one (1) year for any violation of this subsection (c). The department is authorized to bring an action to enforce any civil penalty under this subsection (c) in a complaint filed in the chancery court of the county where the merchant is located.

TDHS' Program Integrity Unit (PIU) contacted the Tennessee Alcohol Beverage Commission and obtained a list of the names, physical, and mailing address of licensed liquor stores across the state on a quarterly basis. To obtain the addresses for adult entertainment businesses that meet the definition of Public Law 112-96, PIU initially contacted each County Sheriff Department across the state to identify the name and location of any adult cabaret business known in that county. PIU maintains this list by performing web searches on a quarterly basis to identify new "adult cabaret" business and/or changes to the established list. Under Tennessee Code Annotated 39-17-501, casinos, gambling casinos, or gaming businesses as defined by Public Law 112-96 are prohibited. Tennessee borders multiple states that have legalized gambling and gaming businesses (i.e. Kentucky, Mississippi, etc.). TDHS' PIU is using recipient EBT transaction data and queries on known businesses and keyword(s) (i.e. casino, gaming, etc.) to identify recipients who have used their EBT card in an out of state restricted business. Under Tennessee Code Annotated 71-3-126, Public Law 312, a recipient cannot use their benefits at a retail store that derives its largest category of sales from loose tobacco, cigars, cigarettes, pipes and other smoking accessories. This is monitored via EBT transaction data and queries.

Additionally, TDHS uses a series of monthly reports based on queries on keywords in the EBT store name and the list of established businesses to obtain the name and address of new businesses discovered through the monitoring process. Owner(s) of any new restricted establishments that are discovered as a result of the above efforts will be notified in writing of the State law and penalties for obtaining or using cash assistance from an EBT card in a restricted business.

TDHS' PIU worked with the Business Intelligence Unit to develop a series of reports to monitor EBT transactions at restricted locations at liquor stores, adult cabaret, gaming establishments and tobacco stores. These reports are reviewed on a quarterly basis by the TDHS PIU. TDHS' PIU conducts an investigation on locations and recipients that are identified on the quarterly reports. Once investigated, the TDHS' PIU will determine and establish claims in the amount of cash assistance accessed in a restricted location for clients that have received benefits in a restricted location per State law. TDHS' PIU also assesses penalties on the businesses that violate the federal and state law.

We will work to ensure that our TANF recipients have adequate access to their cash assistance. Business owners will provide the DHS PIU Division with ATM location details. Based on that information, the PIU will assess the restricted locations to determine if there are other nearby unrestricted businesses where benefits can be accessed. If there appears to be an access problem, the DHS PIU will then notify the TANF Program Director concerning locations where a client may not have adequate access to their cash assistance. If determined needed, the DHS TANF, team along with PIU, will work with businesses in order to purchase POS systems that will be able to be used by clients without being charged a surcharge fee.

The Tennessee EBT Cash Access Location Report is available on [https://www.tn.gov/content/dam/tn/human-services/documents/TN\\_locations.pdf](https://www.tn.gov/content/dam/tn/human-services/documents/TN_locations.pdf).

This report provides POS locations throughout the State of Tennessee with and without surcharge fees.

The client will have the opportunity to appeal any potential claim for using their cash assistance in a restricted location.

Brochures are provided by TDHS' contracted EBT vendor to every recipient who uses an EBT card to access his/her benefits. These brochures thoroughly explain use, fees, and possible surcharges that apply to electronic fund transactions and penalties for illegal use including those for use at restricted businesses.

**h. Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act)**

#### **TANF Electronic Benefits Transfer (EBT) Restrictions Requirements**

Any client or caretaker receiving TANF assistance that participates or allows another to use the client's EBT card in an EBT transaction at an ATM machine or Point of Sale (POS) device in any prohibited business location shall be subject to the following penalties:

- Reimburse the department for the amount withdrawn and used subject to any prohibition in federal law.
- Upon a third or subsequent violation, if permitted by federal law, the person shall be permanently disqualified from receiving public assistance benefits by means of direct cash payment or an electronic benefits transfer access card.

A person or entity subject to a penalty or sanction under this section shall have the right to a hearing pursuant to the Uniform Administrative Procedures Act, compiled in title 4, chapter 5.

TDHS shall designate a protective payee to administer the temporary public assistance grant for the benefit of the assistance unit in the event a client or caretaker is disqualified from receipt of public assistance benefits by means of direct cash payment or an EBT card under this Chapter.

Any person or business entity who allows another to use the client's EBT card in an EBT transaction at an ATM machine or POS device in any prohibited business location shall be subject to the following penalties:

1. One thousand dollars (\$1,000) for the first violation;
2. Two thousand five hundred dollars (\$2,500) for the second violation within five (5) years;
3. Five thousand dollars (\$5,000) for a third or a subsequent violation within five (5) years.

The district attorney general may bring an action to suspend the business licenses and permits of the person or business entity for one (1) year for any violation of this subsection (c). The department is authorized to bring an action to enforce any civil penalty under this subsection (c) in a complaint filed in the chancery court of the county where the merchant is located.

TDHS' Program Integrity Unit (PIU) contacted the Tennessee Alcohol Beverage Commission and obtained a list of the names, physical, and mailing address of licensed liquor stores across the state on a quarterly basis. To obtain the addresses for adult entertainment businesses that meet the definition of Public Law 112-96, PIU initially contacted each County Sheriff Department across the state to identify the name and location of any adult cabaret business known in that county. PIU maintains this list by performing web searches on a quarterly basis to identify new "adult cabaret" business and/or changes to the established list. Under Tennessee Code Annotated 39-17-501, casinos, gambling casinos, or gaming businesses as defined by Public Law 112-96 are prohibited. Tennessee borders multiple states that have legalized gambling and gaming businesses (i.e. Kentucky, Mississippi, etc.). TDHS' PIU is using recipient EBT transaction data and queries on known businesses and keyword(s) (i.e. casino, gaming, etc.) to identify recipients who have used their EBT card in an out of state restricted business. Under Tennessee Code Annotated 71-3-126, Public Law 312, a recipient cannot use their benefits at a retail store that derives its largest category of sales from loose tobacco, cigars, cigarettes, pipes and other smoking accessories. This is monitored via EBT transaction data and queries.

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TDHS' PIU worked with the Business Intelligence Unit to develop a series of reports to monitor EBT transactions at restricted locations at liquor stores, adult cabaret, gaming establishments and tobacco stores. These reports are reviewed on a quarterly basis by the TDHS PIU. TDHS' PIU conducts an investigation on locations and recipients that are identified on the quarterly reports. Once investigated,

the TDHS' PIU will determine and establish claims in the amount of cash assistance accessed in a restricted location for clients that have received benefits in a restricted location per State law. TDHS' PIU also assesses penalties on the businesses that violate the federal and state law.

We will work to ensure that our TANF recipients have adequate access to their cash assistance. Business owners will provide the DHS PIU Division with ATM location details. Based on that information, the PIU will assess the restricted locations to determine if there are other nearby unrestricted businesses where benefits can be accessed. If there appears to be an access problem, the DHS PIU will then notify the TANF Program Director concerning locations where a client may not have adequate access to their cash assistance. If determined needed, the DHS TANF, team along with PIU, will work with businesses in order to purchase POS systems that will be able to be used by clients without being charged a surcharge fee.

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**i. Indicate whether it intends to treat families moving from another State differently from other families under the program, and if so how (section 402(a)(1)(B)(i) of the Social Security Act)**

#### **Out-of-State Families**

TDHS applies the Families First/TANF program policies to all applicant/recipients who are residents, including those families who were past recipients in another state and move to Tennessee. The policies and procedures of the Families First/TANF program will be applied uniformly to current and to new state residents. Families seeking the Diversion payment must demonstrate six (6) months of residency in Tennessee.

**j. Indicate whether it intends to provide assistance to non-citizens, and if so include an overview of the assistance (section 402(a)(1)(B)(ii) of the Social Security Act)**

#### **Treatment of Non-citizens**

TDHS provides assistance to non-citizens using the rules outlined in the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, the Trafficking Victim Protection Act of 2000, and federal rules regarding certain battered women and children. TDHS does not offer state-only funded programs for non-citizens. The current Families First/TANF program policy allows eligibility for individuals with the following non-citizen status and length of time in the U.S.:

- Refugee (admitted under Section 207) in the U.S. less than five (5) years
- Asylee (admitted under Section 208) in the U.S. less than five (5) years
- Deportation Withheld (under section 243(h)) in the U.S. less than five (5) years
- Honorably Discharged Veterans
- Armed Forces Active Duty
- Spouse/Child/ of Veteran
- Spouse/Child of Armed Forces Active Duty
- Hmong or Highland Laotian
- Spouse of Hmong or Highland Laotian
- Dependent Child of Hmong or Highland Laotian
- Filipinos who are considered US Armed Service Vets
- Legal Permanent Resident (LPR) with forty (40) Qualifying Quarters
- Legal Permanent Resident (LPR) ins US more than five (5) years
- Amerasian Immigrant in U.S. less than five (5) years
- Cuban/Haitian Entrant admitted under Section 21 (h)(5) in the U.S. less than five (5) years
- Conditional Entrant (admitted under INA Section 203 (a)(7) ineligible status for more than five (5) years
- Parolee (status granted under INS Section 212 (d)(5) for 1 or more years – entry date on or after 8/22/96 after in “parolee” status for five (5) or more years
- Trafficking Victims in accordance with 107(b)(1) of the Trafficking Victim Protection Act of 2000
- Certain Women and Children in battered status and in the U.S. less than five (5) years
- Afghan Special Immigrant admitted under 101 (a)(27) effective 12/26/2007
- Afghan Special Immigrant admitted under 101 (a)(27) effective 12/19/2009 (in the U.S. less than five (5) years
- Iraqi Special Immigrant admitted under 101 (a)(27) effective 1/28/2008
- Iraqi Special Immigrant admitted under 101 (a)(27) effective 12/19/2009 ( in U.S. less than five (5) years)

k. Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act)

#### Ensuring Program Integrity

Program integrity is twofold. It includes both the provision that benefits must be provided timely and provided correctly and that recipients are provided with an avenue to voice their complaints/concerns through an appeal process.

Appeals are handled by the TDHS' Appeals and Hearings Division, an entity whose only purpose is to fulfill the function of determining whether the correct action was taken on a case when that action has resulted in client dissatisfaction. Any applicant for, or recipient of, Families First/TANF may file an appeal through the county office, district office, State Office, or our Family Assistance Service Center (FASC). Every applicant/recipient is informed of his/her right to appeal if he/she is aggrieved by an action or lack of action by TDHS. Anyone who applies or wants to apply for Families First/TANF cash assistance is given an informational pamphlet that explains the right of Appeal and Fair Hearing, the method by which a hearing may be obtained, and that his/her case may be presented by a household member or a representative. All applicants/recipients are informed about these rights.

Resources that were previously used for quality control purposes in the Aid to Families with Dependent Children (AFDC) program were redirected to monitor and evaluate Families First/TANF program. Focusing on outcomes rather than process will continue to ensure accountability. A method remains in place to ensure that payment accuracy and standards of promptness are achieved. An active case review team will review a statistically valid sample of cases that are actively receiving Families First/TANF (those not slated for closure); to ensure policy and payment accuracy and that appropriate case management services are provided. The results of these reviews are provided to the management team of each area in the state and are used to determine areas where additional training may be needed. Individual errors found in cases are also addressed and corrected.

l. Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v) of the Social Security Act)—

1. Providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or
2. In other occupations related to elder care, high-demand occupations, or occupations expected to experience labor

shortages as, determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.

#### **Patient Protection and Affordable Care Act of 2010**

The Families First/TANF Program does not intend, at this time, to develop a specific program to assist clients to train for, seek, and maintain employment in:

- Providing direct care in a long-term care facility (as such terms are defined under Section 1397j of Title VI; or
- Other occupations related to elder care determined appropriate by the State for which the State identifies an unmet need for service personnel.

The ECMS Providers currently assist some Families First/TANF clients with work and/or educational training that apply to the above criteria as part of their general work requirement activities based on their needs and abilities.

m. Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7)

#### **MOE Programs**

Tennessee has discontinued providing Families First/TANF cash assistance and services to some eligible families under a Separate State Program (SSP), using only State Maintenance of Efforts (MOE) funds. TDHS' MOE funds can be spent in any of the following categories: cash assistance, work/training related activities and associated support services, child support pass-through, Families First/TANF Program Administration, and Families First/TANF MOE Child Care. Families First/TANF eligibility, as outlined in section (a), is a requirement for usage of the TDHS MOE funds. TDHS does not currently have any SSP MOE Programs.

#### **Public Involvement**

TDHS continues to uphold efforts to improve the Families First/TANF program through public involvement by meeting with advocates groups to discuss the state of the Families First/TANF program and proposed improvements. TDHS continues to maintain the trust of our clients, partners,

and the public by demonstrating excellence in service delivery, results, and effective fiscal stewardship. The Families First/TANF program understands the importance of public-private partnerships and continues to collaborate with other agencies throughout the state.

### Americans with Disabilities Act Provisions

The Families First/TANF program, including any contracting agencies providing services to Families First/TANF clients, are required to comply with all ADA provisions in the application of policy and provision of services.

## TANF Certifications

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

The State Plan must include	Include
1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);	Yes
2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act);	Yes
3. Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and privatesector organizations (section 402(a)(4) of the Social SecurityAct)—	
3. (A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and	Yes
3. (B) have had at least 45 days to submit comments on the plan and the design of such services;	Yes
4. Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act);	Yes
5. Establish and enforce standards and procedures to ensure against program fraud and abuse,including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act);	Yes
6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—	
6.i. screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;	Yes
6.ii. refer such individuals to counseling and supportive services; and	Yes
6.iii. waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency	Yes

The State Plan must include	Include
requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.	

## Employment and Training Programs Under the Supplemental Nutrition Assistance Program (Programs Authorized Under Section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))

### a. General Requirements [27]

The State agency must prepare and submit an Employment and Training (E&T) Plan to its appropriate Food and Nutrition Service (FNS) Regional Office. The E&T Plan must be available for public inspection at the State agency headquarters. A State agency may include its plan for the SNAP E&T program in a Combined Plan under WIOA but will require FNS approval prior to implementation and must continue to make a copy of the plan available for public inspection. If a State includes SNAP E&T in a Combined Plan under WIOA, the State agency will detail the following for each year covered by the Combined Plan:

[27] 7 CFR § 273.7(c)(6)

1. The nature of the E&T components the State agency plans to offer and the reasons for such components, including cost information. The methodology for State agency reimbursement for education components must be specifically addressed;

This training will be conducted within the American Job Center (AJC) under the One Stop structure designed under Workforce Innovation Opportunity Act (WIOA). We will focus this training on the Able-Bodied Adults without Dependents (ABAWD) participants in order to provide skills to move them to employment quickly. We will also provide this training on a limited basis to other volunteers based on the participant's needs and available funding for transportation assistance. Unlike the self-service job search, this training is designed to provide one-on-one case management and assess the participant to determine what activities best fit their needs. Based on this assessment, an individualized employment plan will be developed to include at least four activities completed within six weeks. These activities resume writing assistance and workshops, online job search training, interviewing skills workshops and practice session, and other approved training offered within the One Stop AJC. Job search hours performed at the AJC within this training will also count for the ABAWD work requirement hours. Participants will be eligible for transportation assistance in \$25 weekly increments, depending on the participant's need and level of participation.

Job retention services will be offered for a minimum of 30 days up to a maximum 90 days to participants who gain employment after participating in another Employment and Training (E&T) component. Job retention services include case management, reimbursements for required uniforms or other clothing for employment, equipment, supplies, and required tools to perform the job, testing fees, and transportation.

Individuals who volunteer for E&T and lack a High School Diploma or Equivalent will be referred to the local Adult Education (Title II) Partners. Adult Education (AE) in Tennessee is divided into a three-level instructional system focusing on reading, writing, and math skills to bring client's functional level up enabling her/him to pass a High School Equivalency Test (HiSET), begin desired career pathway while competing in the labor market. Participants who do not speak English as their primary language can receive services through Adult Education through Integrated English Literacy and Civics Education (IELCE).

Under IELCE, those participants can receive additional services to help with preparing to receive their High School Equivalency Diploma. Once prepared, the individual will take the HiSET to obtain their High School Equivalency Diploma. SNAP E&T funding will be spent on the individual to provide transportation assistance. The State has allocated funding for the test if the participant meets their testing criteria. Success will be measured based on the number of participants who successfully obtain their HiSET.

Individuals who are determined through an assessment to need academic, technical knowledge, and skills necessary for employment will be offered services through the One-Stop System, Community/Technical Colleges, and/or Community Based Organizations. Services offered will assist the individual in obtaining a degree/certificate to allow them to better compete in the job market. Training programs that participants are sent through are determined based on Labor Market Information. If eligible for enrollment with Title I, the participant will be considered co-enrolled with SNAP E&T to ensure that all reasonable and necessary costs are covered for successful program completion. Services offered through Third Party Partnerships (TPP) will vary but will provide the reasonable and necessary costs for the individual to complete the component and receive the recognized credentials. Reasonable and necessary costs and all available funding streams are documented on a worksheet. Remaining unmet need is determined. SNAP E&T will send an approval to training provider for the amount they will be allowed to invoice SNAP E&T. If the participant must incur the costs themselves, the amount will be approved first and then participant will submit the receipt and a W9 for reimbursement to be processed.

Activities will focus on developing the knowledge, skills, attitudes, and aspirations to help participants successfully pursue, obtain, and maintain employment or specialized training leading to employment in the local labor market. Work Readiness Training will focus on Personal Effectiveness Competencies (i.e. soft skills) such as interpersonal skills, integrity, professionalism, initiative, and dependability, and reliability, along with communication skills and teamwork. Job search training activities are highly encouraged and will also be used in support. E&T provider staff will determine the need for work readiness after conducting a thorough assessment of the participant's needs and barriers. Cost for this component will consist of staff time charges providing the services, as well as transportation assistance, to participants.

An assessment will be conducted by the AJC or TPP staff to determine the need and availability to participate in Work Experience, On-the-Job Training (OJT), and Pre-Apprenticeship/Apprenticeship. Work Experience will be offered through WIOA Title I and approved TPPs. The participants will be obtaining experience through work-based learning as well as receiving continued mandatory case management services. Cost for this component will consist of staff time charges providing the case management services, transportation assistance to participants, and necessary equipment for training site, if needed.

2. An operating budget for the Federal fiscal year with an estimate of the cost of operation for each Federal fiscal year covered by the Combined Plan. Any State agency that requests 50 percent Federal reimbursement for State agency E&T administrative costs, other than for participant reimbursements, must include in its plan, or amendments to its plan, an itemized list of all activities and costs for which those Federal funds will be claimed, including the costs for case management and casework to facilitate the transition from economic dependency to self-sufficiency through work. Costs in excess of the Federal grant will be allowed only with the prior approval of FNS and must be adequately documented to assure that they are necessary, reasonable and properly allocated. A State must submit a plan amendment to request budget adjustments at least 30 days prior to planned implementation;

	State Cost	Federal Cost	Total
<b>I. Direct Costs:</b>			
<b>a) Salary/Wages</b>	\$0	\$0	\$0
<b>b) Fringe Benefits* Approved</b> (Fringe Benefit Rate Used 32%)			
<b>c) Contractual Costs (Admin Only)</b>	\$3,344,640	\$6,072,912	\$9,417,552
<b>d) Non-capital Equipment and Supplies</b>	\$0	\$0	\$0
<b>e) Materials</b>	\$0	\$0	\$0
<b>f) Travel</b>	\$0	\$0	\$0
<b>g) Building/Space</b>	\$0	\$0	\$0

	State Cost	Federal Cost	Total
<b>h) Equipment &amp; Other Capital Expenditures</b>	\$0	\$0	\$0
<b>Total Direct Costs</b>	\$3,344,640	\$6,072,912	\$9,417,552
<b>II. Indirect Costs:</b>			
<b>Indirect Costs* Approved Indirect (Cost Rate Used: 14.59%)</b>			
<b>III. In-kind Contribution</b>			
<b>State In-Kind Contribution</b>	\$0	\$0	\$0
<b>Total Administrative Cost (Total of items I, II, III)</b>	\$3,344,640	\$6,072,912	\$9,417,552
<b>100 Percent Federal E&amp;T Grant</b>		\$2,728,272	\$2,728,272
<b>50 Percent Additional Administrative Expenditure</b>	\$3,344,640	\$6,072,912	\$9,417,552
<b>IV. Participant Reimbursement (State plus Federal)</b>			
<b>a) Dependent Care (including contractual costs)</b>	\$0	\$0	\$0
<b>b) Transportation &amp; Other Costs (including contractual costs)</b>	\$482,784	\$482,784	\$965,568
<b>c) State Agency Cost for Dependent Care Services</b>	\$0	\$0	\$0
<b>Total 50 Percent Participant Reimbursement</b>	\$482,784	\$482,784	\$965,568
<b>V. Total Costs</b>	\$3,827,424	\$6,555,696	\$10,383,120

**Table 30: TN SNAP E&T - Estimate of Costs of Operation**

3. The categories and types of individuals the State agency intends to exempt from E&T participation, the estimated percentage of work registrants the State agency plans to exempt, and the frequency with which the State agency plans to reevaluate the validity of its exemptions;

The Tennessee Department of Human Services (TDHS) Eligibility Counselors will have the authority to grant individual exemptions based on information received from an interview with the SNAP participant and/or information received from TDLWD. (For state exemptions, DHS has authority). Individual exemptions shall be evaluated at the participant's next recertification unless the client reports a change that requires the worker to make a re-determination. TDHS has a waiver through January 31, 2020, exempting seven (7) counties from ABAWD time counts. We are exploring apprenticeship partnerships to assist the ABAWD population, as they are highly disadvantaged. We envision this apprenticeship program would assist the participant in obtaining needed credentials and/or job skills for ensuring satisfactory employment upon completion while offering the possibilities of earning wages and benefits.

#### 4. The characteristics of the population the State agency intends to place in E&T;

The population for E&T will consist of SNAP participants who are not on Temporary Assistance for Needy Families (TANF); who are able and willing to work; and who volunteer for the program. Additionally, we also plan to put an intentional focus on encouraging the participation of individuals in rural counties, reentry individuals, youth between the ages 18 and 24, veterans, and the senior populations.

#### 5. The estimated number of volunteers the State agency expects to place in E&T;

The estimated number of volunteers Tennessee plans to serve for FY2020 is 7,969.

#### 6. The geographic areas covered and not covered by the E&T Plan and why, and the type and location of services to be offered;

The E & T program is statewide in 95 counties in Tennessee.

#### 7. The method the State agency uses to count all work registrants as of the first day of the new fiscal year;

The TDHS eligibility determination system calculates an unduplicated work registrant count and a snapshot of work registrants in the state as of October 1st each fiscal year.

#### 8. The method the State agency uses to report work registrant information on the quarterly Form FNS-583;

As of October 1st, the original referral date for each client is maintained in the eligibility system by the client's social security number, ensuring there will be no duplicative count of work registrants. If SNAP benefits are terminated and re-approved within the same federal fiscal year, TDHS' system will not count the participant more than once. Federal reporting data for work components and demographics is in the case management system for Tennessee: Jobs4TN. This data will be collected and compiled by running queries through tables located in the Jobs4TN database that contains the needed information.

#### 9. The method the State agency uses to prevent work registrants from being counted twice within a Federal fiscal year. If the State agency universally work registers all SNAP applicants, this method must specify how the State agency excludes those exempt from work registration under 7 C.F.R. §273.7(b)(1). If the State agency work registers nonexempt participants whenever a new application is submitted, this

method must also specify how the State agency excludes those participants who may have already been registered within the past 12 months as specified under 7 C.F.R. §273.7(a)(1)(i);

#### **Unduplicated Work Registrant Count**

The TDHS eligibility determination system calculates an unduplicated work registrant count and a snapshot of work registrants in the state as of October 1st. The original referral date for each client is maintained in the eligibility system by the client's social security number, ensuring there will be no duplicative count of work registrants. If SNAP benefits are terminated and re-approved within the same federal fiscal year, TDHS' system will not count the participant more than once.

10. The organizational relationship between the units responsible for certification and the units operating the E&T components, including units of the Statewide workforce development system, if available. FNS is specifically concerned that the lines of communication be efficient and that noncompliance by the participant be reported to the certification unit within 10 working days after the noncompliance occurs;

#### **Narrative Coordination Statements:**

- TDLWD SNAP E&T Central office staff meets with TDHS SNAP Policy staff quarterly throughout the year. Issues and mutual concerns are discussed and resolved. Coordination of future on-site reviews are planned and discussed. Suggestions are offered for program improvement from both agencies. The meetings result in a better understanding of problems encountered by each agency. The outcome is that partner agencies pull together for the success of the program and the customers gain.

#### **Program Reviews:**

- TDLWD has a Program Accountability Review (PAR) Team that performs annual reviews. In addition to the annual PAR review, the Grants and Program Manager, as well as Regional Staff, will conduct technical assistance and program monitoring at least once per year.
- Program strengths are noted during reviews and recommendations are made to correct any weaknesses, opportunities to improve, or assure timeliness of the delivery of services. Corrective action plans are submitted for approval for any findings to the program.
- TDHS has oversight of the E & T program. TDLWD is the administrator and primary service provider of E&T services.

#### **Information Coordination**

#### **Coordination of Duties Between Departments**

#### **Tennessee Department of Human Services**

- Intakes, Applications, and Recertification of case

- Registration for work, all non-exempt household members (non-ABAWD)
- Update addresses and phone numbers on ACCENT.
- Notify TDLWD when a client has been deregistered.
- Coordinate and cooperate with local TDLWD staff.
- Each agency will complete systems training with each other's staff
- Complete and enter E&T Referrals.

#### Tennessee Department of Labor and Workforce Development

- Invite participants with an offer of services.
- Discuss options and responsibilities under the program
- Provide basic overview, assess individual job readiness, and develop an individual Employment Plan.
- Direct individual into appropriate activity with specific offer of referral to a component or job.
- Monitor and report component compliance or noncompliance to TDHS
- Authorize reimbursements
- Notify participant of date and time to conduct follow-up interviews.
- TDLWD staff will authorize reimbursement entitlements and monitor maximum payments to the participants.
- Complete documents and enter system within five working days of action for component placement, any change that has occurred, or component completion.
- Provide all case management throughout a Participants engagement in an E&T Component and seek follow-up to capture Outcome data.

#### Coordination Time Frames

The following coordination time frames will be followed, unless unforeseen circumstances prevent them from occurring:

- Once a referral list is provided by TDHS, TDLWD will send an appointment letter within 7-10 working days.
- TDLWD will schedule orientation within 1-2 weeks of the referral date to allow sufficient time for the participant to enroll in a component and limit the possibility of an incurring countable month.
- TDLWD will immediately enter and electronically transmit the data required to authorize the participant expense reimbursement.
- TDLWD will notify TDHS within five days of any information regarding obtaining a job, changes in income, etc.

- TDLWD sends a notification status email to the DHS field staff at a minimum of every 30 days through VOS.

11. The relationship between the State agency and other organizations it plans to coordinate with for the provision of services, including organizations in the Statewide workforce development system, if available. Copies of contracts must be available for inspection;

TDHS is the direct grantee of Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) Funds. TDHS and TDLWD have partnered through an Interagency Grant Agreement to administer the SNAP E&T program. TDLWD will be responsible for serving all SNAP participants who volunteer in the SNAP E&T program who are able and willing to work who are not on TANF through a vast array of employment and support services to promote workforce development in Tennessee. TDLWD will partner with several Third-Party Partners (TPPs) to accomplish this task while actively pursuing potential TPPs. Please see the FY20 Interagency Grant Agreement:

<https://www.tn.gov/content/dam/tn/workforce/documents/wfs/SNAPFY20InteragencyGrantAgreement.pdf>

12. The availability, if appropriate, of E&T programs for Indians living on reservations after the State agency has consulted in good faith with appropriate tribal organizations;

There are currently no Tribal Organizations in the state of Tennessee.

13. If a conciliation process is planned, the procedures that will be used when an individual fails to comply with an E&T program requirement. Include the length of the conciliation period; and

Tennessee's SNAP E&T program is voluntary for federal fiscal year 2020; therefore, the conciliation policy is not applicable at this time.

14. The payment rates for child care established in accordance with the Child Care and Development Block Grant provisions of 45 CFR 98.43, and based on local market rate surveys.

Tennessee Department of Human Services										
Child Care Certificate Program Provider Reimbursement Rates Including Star-Quality Bonus Payments										
Effective July 1, 2019 (no changes in top tier counties)										
Child Care Centers	State Rate		One Star		Two Stars		Three Stars			
	Top Tier	Lower Tier	Top Tier	Lower Tier	Top Tier	Lower Tier	Top Tier	Lower Tier	Top Tier	Lower Tier
Infant (Full-time) (a) 6 wks to 13 mos	\$178.00	\$128.00	\$187.00	\$134.00	\$205.00	\$147.00	\$214.00	\$154.00		
Toddler (Full-time) (a) 13 mos to 31 mos	\$155.00	\$115.00	\$163.00	\$121.00	\$178.00	\$132.00	\$188.00	\$138.00		
Preschool (Full-time) (a) 31 mos to Kindergarten	\$119.00	\$93.00	\$125.00	\$98.00	\$137.00	\$107.00	\$143.00	\$112.00		
School In	\$90.00	\$54.00	\$93.00	\$57.00	\$99.00	\$62.00	\$102.00	\$65.00		
School Out	\$90.00	\$78.00	\$95.00	\$82.00	\$104.00	\$90.00	\$108.00	\$94.00		

Group Homes	State Rate		One Star		Two Stars		Three Stars			
	Top Tier	Lower Tier	Top Tier	Lower Tier	Top Tier	Lower Tier	Top Tier	Lower Tier	Top Tier	Lower Tier
Infant (Full-time) (a) 6 wks to 13 mos	\$155.00	\$108.00	\$163.00	\$113.00	\$178.00	\$124.00	\$186.00	\$130.00		
Toddler (Full-time) (a) 13 mos to 31 mos	\$135.00	\$101.00	\$142.00	\$108.00	\$155.00	\$116.00	\$162.00	\$121.00		
Preschool (Full-time) (a) 31 mos to Kindergarten	\$108.00	\$85.00	\$113.00	\$89.00	\$124.00	\$98.00	\$130.00	\$102.00		
School In	\$90.00	\$54.00	\$93.00	\$57.00	\$99.00	\$62.00	\$102.00	\$65.00		
School Out	\$90.00	\$72.00	\$95.00	\$78.00	\$104.00	\$83.00	\$108.00	\$88.00		

Family Homes	State Rate		One Star		Two Stars		Three Stars			
	Top Tier	Lower Tier	Top Tier	Lower Tier	Top Tier	Lower Tier	Top Tier	Lower Tier	Top Tier	Lower Tier
Infant (Full-time) (a) 6 wks to 13 mos	\$135.00	\$101.00	\$142.00	\$108.00	\$155.00	\$116.00	\$162.00	\$121.00		
Toddler (Full-time) (a) 13 mos to 31 mos	\$128.00	\$95.00	\$134.00	\$100.00	\$147.00	\$109.00	\$154.00	\$114.00		
Preschool (Full-time) (a) 31 mos to Kindergarten	\$102.00	\$80.00	\$107.00	\$80.00	\$117.00	\$88.00	\$122.00	\$102.00		
School In	\$75.00	\$60.00	\$78.00	\$63.00	\$84.00	\$69.00	\$90.00	\$72.00		
School Out	\$90.00	\$65.00	\$95.00	\$59.00	\$104.00	\$68.00	\$108.00	\$102.00		

Authorized	State Rate	
	Top Tier	Lower Tier
Infant (Full-time) (a) 6 wks to 13 mos	\$95.00	\$72.00
Toddler (Full-time) (a) 13 mos to 31 mos	\$90.00	\$68.00
Preschool (Full-time) (a) 31 mos to Kindergarten	\$72.00	\$59.00
School In	\$42.00	\$42.00
School Out	\$64.00	\$55.00

(a) Part-time for Infant, Toddler, and Preschool is one-half the full-time rate (rounded up)

\* = One Star Rates equal the State rate plus a 5% quality bonus payment for Licensed providers

\*\* = Two Star Rates equal the state rate plus a 15% quality bonus payment for Licensed providers

\*\*\* = Three Star Rates equal the State rate plus a 20% quality bonus payment for Licensed providers

Note: State will reimburse at any lower rate offered by a provider to the general public. Star Bonuses will be computed from a lower provider rate.

Note: "Top Tier Counties" are those with the 20 highest average populations in 2015 and/or 20 highest per capita incomes 2014-2016. The following counties meet one of those criteria:

Anderson, Blount, Bradley, Coffee, Davidson, Fayette, Greene, Hamilton, Knox, Loudon, Madison, Maury, Montgomery, Moore, Putnam, Roane, Robertson, Rutherford, Sevier, Shelby, Sullivan, Sumner, Tipton, Trousdale, Washington, Williamson, Wilson

Figure 25 - TN SNAP E&T - Child Care Certificate Program Provider Reimbursement Rates

15. The combined (Federal/State) State agency reimbursement rate for transportation costs and other expenses reasonably necessary and directly related to participation incurred by E&T participants. If the State agency proposes to provide different reimbursement amounts to account for varying levels of expenses, for instance for greater or lesser costs of transportation in different areas of the State, it must include them here.

Participant reimbursement amounts vary based on the type of support requested. The transportation assistance will be provided in \$25 increments depending on the component. There is a Max of \$100 reimbursement and this is dependent not just on component, but level of participation/days of travel. All other amounts of support will depend on the vendor and the geographical location in which they are purchased. We will ensure all costs meet the reasonable and necessary standard and will utilize vendors on the state's approved vendor list.

16. Information about expenses the State agency proposes to reimburse. FNS must be afforded the opportunity to review and

comment on the proposed reimbursements before they are implemented.

All allowable supportive services that are considered reasonable and necessary will be covered by SNAP E&T, Title I and/or TPPs. We utilize training provider cost sheets to assist in determining the reasonable and necessary costs. All effort is made for costs to be paid to training provider so that participants do not have to cover the costs and wait for the reimbursement process. The most common supportive services are items such as books, uniforms, drug screens, tools, supplies, and transportation.

## **b. Able-bodied Adults without Dependents (ABAWD) [28]**

1. A State agency interested in receiving additional funding for serving able-bodied adults without dependents (ABAWDs) subject to the 3- month time limit, in accordance with 7 C.F.R. §273.7(d)(3), must include the following for each Federal fiscal year covered by the Combined Plan under WIOA:

[28] 7 CFR § 273.7(c)(7)

### **1. Its pledge to offer a qualifying activity to all at-risk ABAWD applicants and recipients;**

Tennessee will not operate under a “pledge state” status for FFY 2020.

### **2. Estimated costs of fulfilling its pledge;**

Tennessee will not operate under a “pledge state” status for FFY 2020.

### **3. A description of management controls in place to meet pledge requirements;**

Tennessee will not operate under a “pledge state” status for FFY 2020.

### **4. A discussion of its capacity and ability to serve at-risk ABAWDs;**

Tennessee will not operate under a “pledge state” status for FFY 2020.

### **5. Information about the size and special needs of its ABAWD population; and**

Tennessee will not operate under a “pledge state” status for FFY 2020.

### **6. Information about the education, training, and workfare components it will offer to meet the ABAWD work requirement**

Tennessee will not operate under a “pledge state” status for FFY 2020.

## Jobs for Veterans’ State Grants

(OMB Control Number: 1225-0086)

The Jobs for Veterans’ State Grants (JVSG) are mandatory, formula-based staffing grants to States (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported quarterly on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans’ Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans’ Outreach Program (DVOP) specialists and Local Veterans’ Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

### a. How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;

The state will provide employment, training and job placement services to veterans and eligible persons in accordance with the Jobs for Veteran’s State Grant (JVSG) by:

- Targeting services to veterans and eligible persons with significant barriers to employment (SBE) as defined under VPL 03-14, Ch. 1&2, or current guidance.
- Placing Local Veterans Employment Representatives (LVER) staff throughout the state to reach out and promote the benefits of hiring veterans to employers.
- Developing strategies within the business service team which facilitate the promotion of increased employment of veterans.

DVOPs are required to take an active role in seeking out and assisting these targeted groups by networking with other local, state, and federal government agencies. DVOPs also develop partnerships with veteran service organizations, community service organizations, LWDA partners, faith based organizations, and any other entities that are dedicated to locating and serving veterans in need and helping them with the purpose of providing individualized career services as indicated under WIOA law so they are able to successfully compete in the job market. Tennessee Department of Labor and Workforce Development (TDLWD) acknowledge that homeless veterans are not likely to seek our services on their own and that an “under the bridge” approach is to be taken by DVOPs, encouraging them to go where these individuals can be found. DVOPs will also go to locations where there is access to organizations such as US DOL Homeless Veterans Reintegration Program (HVRP) grantees to provide services to homeless veterans as needed.

The goal is to help the Veteran become job ready and gain employment in a field of their interest and/or ability. Veterans and eligible persons who are identified as having SBE through the initial intake process at the AJC, and need specific Individualized Career Services, will be referred to appropriate DVOP staff for assistance as required. The DVOP and the veteran/eligible person will work together to complete a career assessment and document any current or potential SBEs, then

monitor them through the Case Management process. The veteran would then, if required, be referred to an appropriate partner for additional services as needed. In the absence of DVOP staff, the Team Lead, or other W/P staff, assumes responsibility for the career assessment of the individual and assures that appropriate referrals and services are provided. DVOPs are a supplement to the AJC staff and should not be a substitute for providing services.

Tennessee will continually monitor and assess the performance data of services provided to ensure that the roles and responsibilities of both the DVOP and the LVER are adhered to and determine if adjustments to the program are needed. The Quarterly Manager's Reports, along with onsite office validations and desk audits, will be used to ensure compliance with this directive and other guidance as given by DOL ETA, VETS, and the TDLWD.

LVER staff will be placed throughout the state to reach out to employers and promote the benefits of hiring veterans. One way this promotion process can be accomplished is by introducing employers to the immediate tangible benefits such as the Work Opportunity Tax Credit (WOTC, when funded) that is available to them when they hire veterans. In addition to the tangible incentives they can get is the short and long range benefits gained from the intangible "soft skills" veterans bring to the hiring table, teamwork, trainability, leadership, diversity in the workplace, and a host of others that are inherent to the military experience. By "showcasing" our veterans, the LVER staff increases job opportunities for them.

Consolidated Position Staff serve a dual role as DVOP specialist and LVER, focusing on the rural areas of the state to provide services to both employers and SBE veterans/eligible persons. They conduct employer outreach, job searches, and establish job search groups. After they have removed all barriers to employment through individualized career services, consolidated staff coordinate with AJC apprenticeship, OJT programs and local business engagement team staff to match veterans with job opportunities. Consolidated staff also provide training to other AJC staff to ensure programmatic compliance in serving the needs of veterans seeking our assistance.

The advantage of hiring Veterans is a topic that needs to be presented to an employer consistently. Tennessee's American Job Centers (AJCs), through the Business Services Team (BST), will provide an effective conduit to promote veterans to businesses as a sound and wise investment. Federal contractors and subcontractors are also targeted as companies that not only can benefit from the hiring of veterans, but they are informed about their responsibilities under the Office of Federal Contract and Compliance Programs (OFCCP) and Vietnam Era Veterans Readjustment Assistance Act (VEVRAA) guidelines as well. This is done through our BST, which includes the Local Veterans' Employment Representative (LVER), the Local Office Team Lead, Wagner Peyser (W/P) staff, Local Workforce Development Area (LWDA) staff as well as the Tennessee's Department of Labor's Workforce Development (TDLWD) Marketing Services Team within the Service Delivery System. All provide valuable information about promoting veterans within a variety of venues including job fair participation, Chamber of Commerce meetings, Society of Human Resource Managers (SHRM) meetings, employer visits, public radio and television service spots and departmental brochures. Besides the benefits of hiring Veterans, employers are informed about the assistance available to them at the AJC, such as the ability to conduct individual hiring fairs and notification of job opportunities to potential candidates.

Retention of our Veterans who received case-managed services is accomplished through follow – up within 30 days of initial hire between the individual Veteran and the employer by our DVOP staff. This allows both parties an opportunity to discuss potential issues before they escalate.

The working relationship between the Local Veteran Employment Representative (LVER) and The Fort Campbell Strong Workforce Partnership (FCSWP) is a best practice for Tennessee. FCSWP is a project which provides individualized career services to dislocated soldiers and their spouses in Tennessee and Kentucky as they transition from active duty service. Utilizing enhanced career

services, the project connects soldiers and their spouses to training, education, and employment. Soldiers and their spouses are better positioned for direct hiring and training by using this project to negotiate and network for them with employers. The Local Veteran Employment Representative (LVER) assists the FCSWP staff with employer outreach and placement services.

LVERs from the JVSG program promote the hiring of veterans. Separating soldiers and employers are aided by the marketing of the LVERs and the training and salary benefits of the OJT and apprenticeships, sponsored by FCSWP. LVERs also work closely with chambers of commerce and local government across the state with the development of a military recruitment strategy for their areas. The partnership of the LVERs and FCSWP provides a smooth transition from military service to civilian employment.

Businesses within both states can benefit from work-based training packages such as On-the-job training and Apprenticeships. OJT is a proven, evidence-based strategy under WIOA that provides for reimbursements to businesses to help compensate for the costs associated with skills upgrading and loss of production for the training of newly hired employees. Employers are offered the opportunity to train and develop their workforce to their specific needs while receiving a 50% reimbursement for the first 400 hours of training for new employees placed in OJT.

**b. The duties assigned to DVOP specialists and LVER staff by the State; specifically implementing DVOP and LVER duties or roles and responsibilities as outlined in 38 U.S.C. § 4103A and 4104. These duties must be consistent with current guidance;**

DVOPs duties:

The primary duty of the DVOP is to provide Individualized Career Services to veterans and others that are eligible and with SBEs through case management.

After the initial assessment of a Veteran in the AJC (by a non JVSG staff), it is determined that they are eligible under the conditions of (VPL 03-19 and VPL 03-14, chgs 1 & 2 or current guidance) to see the DVOP, they will be referred to a DVOP for assistance. To render effective individualized career services, the DVOP must, at a minimum:

1. Conduct an assessment of individual needs.
2. If appropriate, develop a documented plan of action for periodic review.
  - a. These two activities form the core of an effective case management plan under which most individual career services will be delivered.
  - b. Upon completion of assessment, the DVOP can determine the need for additional individualized career services through case management.

These services can take the form of:

1. Providing vocational guidance and counseling as required, such as; skills assessment, career planning, communications skills, interviewing skills, punctuality, personal maintenance skills and professional conduct.

2. Coordination of supportive services by:
  1. Providing technical assistance to community – based organizations regarding employment and training services to veterans.
  2. Developing relationships with VSOs and consulting with other representatives of federal, state, and local programs in order to provide maximum employment assistance.
3. Job referral for specific employment opportunities.
4. Referral to training with other agencies.

The DVOP will provide services to Veterans who have been identified as having an SBE that requires additional enhanced services through case management consistent with VPLs, 03-19 and 03-14 chgs 1 & 2 or current guidance.

#### LVER Duties:

The LVER will actively advocate for employment and training opportunities with business, industry, and community based organizations on behalf of Veterans consistent with VPL 03-14 chgs 1 & 2 or current guidance. LVERs will be assigned duties that promote to employers, employer associations, and business groups the advantages of hiring veterans and will be part of the “Business Services Team” within the AJC that conduct outreach activities to these entities. The following activities will be part of this program:

1. In conjunction with employers, conduct job searches and workshops and establish job search groups to facilitate the use of the TDLWD labor exchange system to enhance their employee search activities.
2. Form effective relationships with the business community and trade unions to enhance the availability of employment and training opportunities for Veterans.
  1. Encourage businesses to hire Veterans and to provide OJT and Apprenticeship programs geared to the Veteran community. Inform and promote the Hire Vets Medallion Program to employers which LVERs contact.
  2. Maintain current labor market information on trends and adjust strategies accordingly.
3. Work with training providers and credentialing bodies to promote opportunities for Veterans.
  1. Encourage employers in professions requiring licensure or certification to develop OJT and/or apprenticeship programs for Veterans.
  2. Promote the participation of Veterans in programs leading to certification or licensure.

3. Advocate with training providers and credentialing agencies for recognition of equivalent military training.

4. Plan and participate in job fairs to provide employment opportunities for Veterans. The LVER will facilitate this by:

1. Initiating contact and developing relationships with employers, community leaders, labor unions, veterans' organizations, and training program representatives to develop their commitment to providing employment and training opportunities for Veterans.
2. Maintaining current information regarding a full range of employment and training options available to Veterans.

5. Work with federal contractors to inform them of the process they can use to recruit and hire Veterans within the TDLWD Labor Exchange System and discuss their responsibilities under the OFCCP and VEVRAA final rule to attain the appropriate percentage of Veteran hires. The net result of LVER outreach to employers and the community will be an increased awareness of the capabilities of Veterans and their qualifications, along with developing employers' willingness to utilize the OJT program that is available to them to increase the opportunity for Veterans.

#### Consolidated Duties:

Consolidated staff focuses on the rural areas of the state and preforms the services of LVER to employers and DVOP to the most in need veterans. This allows one position to fill both roles to ensure veteran services are being provided in all areas of the state. Once a veteran's employment and training needs have been identified, Career Center staff ensures that appropriate services are provided.

#### General Duties:

LVER/DVOPS/Consolidated personnel all attend AJC staff meetings to provide updates on veteran services, to answer questions from staff and to discuss needed services. CONS staffs are also available to provide training to other center staff. CONS staff conducts employer outreach and plan job fairs and other activities to promote the employment of veteran customers.

Strategies to address individual needs include literacy and basic skills programs, resources for occupational skills training, job accommodations, assistive technologies, disability awareness training and other activities that may address barriers and support achievement of positive employment outcomes. Tennessee has established and continues to adhere to a Priority of Service to veterans.

### **c. The manner in which DVOP specialists and LVER staff are integrated into the State's employment service delivery system or American Job Center;**

#### **DVOP Specialist:**

Integration into the Workforce System: Integration of the DVOP via the AJC will be accomplished by utilizing in-place procedures for servicing Veterans with SBEs and combining them with the new policies and processes that will support functional alignment within the AJC. All partners will work

together to support our plan for a seamless, customer-driven system. The new policies will enhance the delivery system and reflect the Governor's vision of effective and efficient governance through the alignment of several programs. This process starts at the initial point of entry into the AJC where the first person that the Veteran encounters will be an intake specialist who is trained in all aspects of the AJC and the services that are available to the Veteran.

TDLWD calls this an "Initial Triage" step. Through the use of a specialized checklist and direct questions, a determination will be made for the level and type of needed service. If the Veteran, or other eligible person, is deemed to have an SBE and has a need for enhanced services, the Veteran will be referred to a DVOP for assistance. If the initial screener decides that the level of service precludes the need to see a DVOP, the person will be referred to a non-JVSG staff member for the required assistance.

Note: Veterans with an SBE, or labeled in a specified category, will have access to all appropriate AJC services and are not limited to receiving services only from DVOP specialists. Once the Veteran is made "Job Ready", the DVOP will coordinate with the BST (this team is responsible for all outreach to employers and includes the LVER) to ensure that these Veterans are promoted within the community as available for immediate job placement.

DVOP staff, other DWS staff and Workforce Partners work together as a close-knit team to provide services to all veterans/eligible persons and combine efforts to provide case management and individualized career service to those veterans who have barriers to employment. Once a veteran is identified as needing individualized career services the DVOP becomes the assigned case manager responsible for referring to and coordinating needed services. VR&E referrals are assigned to the DVOP for case management services and are monitored by the ISC and State Director to ensure all needed services are provided.

#### **LVER Staff:**

The LVER in each Workforce Center is part of the local workforce area business services team. LVER's work with the business services team to develop a plan for an effective employer relations program that emphasizes the hiring and retention of veterans, especially with Federal Contractors. The LVER is also responsible for informing management, staff and other Workforce Center Partners of current veteran policies, laws and programs. Tennessee recognizes the importance of developing Job Driven employment and training opportunities for the veterans residing in the state. Each LVER works with other business engagement staff to identify job driven employment and training opportunities.

LVER staff provides information to DVOP staff and other Workforce Center staff on Job Driven employment and training opportunities that can be filled by veterans with significant barriers to employment or by other veterans. This occurs at weekly staff meetings, through email exchanges and through one-on-one discussion with other staff. Priority of service for veterans is observed for these opportunities, just as with any programs or services that are available.

The LVER in each local workforce area is required to conduct employer visits with the intent of convincing employers to hire veterans and list their hiring needs with the Local Workforce Center.

The LVER identifies and visits Federal Contractors in their area and informs them of their responsibilities and what assistance we can provide in helping the employer meet those responsibilities. The LVER ensures all job orders listed have a 24- hour block on them for veteran referrals only.

LVER's coordinate with local employers and businesses to set up and conduct veteran job fairs when appropriate. These efforts are designed to increase employment and retention opportunities for veterans throughout the state.

A quarterly Managers Report which compiles all Veteran Program activities that occurred in the Workforce Center is submitted at the end of each quarter. This report highlights the activities of the office and veterans for the previous quarter as they assisted the veterans in their local area. These activities include job fairs, workshops, Stand Downs, outreach activities for both LVER and DVOP and any other significant information that affects the Veterans Program. This report is provided by each AJC on a quarterly basis.

**CONSOLIDATED (CONS)** staffs focus on the rural areas of the state and provide services to both employers and SBE Veterans and eligible persons. This allows one position to fill both roles to ensure veteran services are being provided in all areas of the state. Once a veteran's employment and training needs have been identified, the consolidated specialist working with all needed American Job Center (AJC) staff ensures that appropriate services are provided. The CONS in each local workforce area is required to conduct employer visits with the intent of convincing employers to hire veterans and list their hiring needs with the local AJC.

The CONS in each Workforce Center is part of the business services team. CONS work with the business services team to develop a plan for an effective employer relations program that emphasizes the hiring and retention of veterans, especially with Federal Contractors. The CONS are also responsible for informing management, staff and other Workforce Center Partners of current veteran policies, laws and programs.

d. The Incentive Award program implemented using the 1% grant allocation set aside for this purpose, as applicable;

N/A - We are not participating in the incentive plan.

e. The populations of eligible veterans to be served, including any additional populations designated by the Secretary as eligible for services, and any additional populations specifically targeted by the State Workforce

## Agency for services from one-stop delivery system partners (e.g., Native American veterans; veterans in remote rural counties or parishes);

Disabled Veterans Outreach Program Specialists (DVOPs) within the Tennessee Department of Labor-Workforce Development (TDLWD) will specifically service Veterans within all categories that have been identified as SBEs as defined by VPL 3-14, changes 1&2 and VPL 3-19 or current guidance.

DVOPs are required to take an active role in seeking out and assisting these targeted groups by networking with other local, state, and federal government agencies. DVOPs also develop partnerships with Veteran Service Organizations, community service organizations, LWDA partners, faith based organizations, and any other entities that are dedicated to locating and serving Veterans in need and helping them with the purpose of providing individualized career services so they are able to successfully compete in the job market. TDLWD acknowledges that homeless Veterans are not likely to seek our services on their own and that an “under the bridge” approach is to be taken by DVOPs, encouraging them to go where these individuals can be found. In locations where there is access to organizations such as US DOL Homeless Veterans Reintegration Program (HVRP) grantees.

The goal is to help the Veteran become job ready and gain employment in a field of their interest and/or ability. Veterans who are identified as having SBE through the initial intake process at the AJC, and need specific Individualized career Services, will be referred to appropriate DVOP staff for assistance as required. The DVOP and the Veteran will work together to complete a career assessment and document any current or potential SBEs, then monitor them through the Case Management process. The Veteran would then, if required, be referred to an appropriate partner for additional services as needed. In the absence of DVOP staff, the team lead, or other W/P staff, assumes responsibility for the career assessment of the individual and assures that appropriate referrals and services are provided. DVOPs are a supplement to the AJC staff and should not be a substitute for providing services.

Tennessee will continually monitor and assess the performance data of services provided to ensure that the roles and responsibilities of both the DVOP, LVER and consolidated positions are adhered to and determine if adjustments to the program are needed. The Quarterly Manager’s Reports, along with onsite office validations and desk audits, will be used to ensure compliance with this directive and other guidance as given by DOL ETA, VETS, and the TDLWD.

## f. How the State implements and monitors the administration of priority of service to covered persons;

Per GO Memo 01-20 no response required in this section.

g. How the State provides or intends to provide and measure, through both the DVOP and American Job Center staff:

1. Job and job training individualized career services,

Per GO Memo 01-20 no response required in this section.

2. Employment placement services, and

Per GO Memo 01-20 no response required in this section.

3. Job-driven training and subsequent placement service program for eligible veterans and eligible persons;

Per GO Memo 01-20 no response required in this section.

h. The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff; and

Every effort is made to keep vacancies of staff positions down below the 60 day time frame as directed. The Veterans Program Coordinator (VPC) will ensure that the Tennessee's Department of Human Resources is aware of the unique funding stream of the JVSG and will keep all vacancies filled within the 60 day mandate.

TDLWD will ensure that all new hires for DVOP and LVER will attend NVTI for mandatory training within the required 18 month time period.

Employee	Program DVOP/LVER/HYB)	Date Assigned	Completed all required training? Y/N
Freeman, Donnie	Program Coordinator	12/14/2015	Y 6/12/2017
Maass, Lance	ISC	4/28/2019	Y 8/2/2016
Perkins, Darrell	DVOP	11/1/2017	Y 11/30/2018
Duff, John	LVER	2/1/2019	Y 5/19/2017

Employee	Program DVOP/LVER/HYB)	Date Assigned	Completed all required training? Y/N
Keepes, Christopher	DVOP	5/1/2019	Y 11/22/2019
Davis, George	DVOP	11/1/2017	Y 12/21/2019
Powell, Shelby	DVOP	7/16/2019	N
Matthews, Christopher	LVER	11/19/2019	Y 2/28/2020
Elliott, Michael	DVOP	4/17/2006	Y 12/05/2006
White, Glenita	DVOP	4/1/2019	Y 3/8/2019
Seaborn, Davina	DVOP	5/5/2013	Y 8/5/2014
Wood, Christopher	LVER	2/19/2019	Y 2/28/2020
Williams, Marcia	DVOP	3/20/2017	Y 6/9/2017
Potter, Andrew	LVER	9/4/2018	Y 6/26/2019
Balough, Scott	LVER	4/22/2019	N
Simpson, James	LVER	10/1/2019	N
Wyatt, Walter	DVOP	6/3/2013	Y 3/4/2014
Wright, Samantha	LVER	12/16/2019	N
Shamblin, Samuel	CONS	12/29/2019	N
Dent, Jeffrey	CONS	2/3/2019	Y 8/30/2019
Wilson, Julie	DVOP	5/16/2017	Y 4/20/2018
Lane, Heather	LVER	11/16/2017	Y 12/14/2018
Beare, John	DVOP	8/4/2019	N
Todd, Donald	DVOP	3/4/2019	Y 12/13/2019
Fink, Rex	DVOP	10/16/2019	N
Fields, Phillip	LVER	1/15/2019	Y 2/28/2020
Pope, David	DVOP	7/1/2010	Y 9/13/2011
Adams, William	LVER	8/1/2018	Y 11/22/2019
Chagnon, Laura	LVER	1/13/2020	N
Turner, Timothy	DVOP	5/16/2017	Y 5/4/2018
Bledsoe, Bradley	DVOP	10/1/2018	Y 11/1/2019

Employee	Program DVOP/LVER/HYB)	Date Assigned	Completed all required training? Y/N
O’Kane, Misty	CONS	7/29/2018	Y 5/24/2019
Stone, Joe	LVER	7/1/2017	Y 12/14/2018
Baxter, Christopher	LVER	4/1/2019	N
Thomas, Tyrone	DVOP	03/01/2020	N
Curry, Latoya	DVOP	6/1/2017	Y 11/30/2018
Burton, Stanley	LVER	5/1/2018	Y 6/28/2019
Leake, Calvin	DVOP	6/1/2016	Y 4/7/2017
Davis, Ashley	LVER	3/1/2020	N
Pritchard, Peter	DVOP	8/16/2010	Y 8/2/2011
Cupp, James	DVOP	10/12/2014	Y 5/1/2015
Streckert, Heather	DVOP	8/18/2019	N
Evans, Brian	LVER	3/2/2020	N
Ventura, Paul	LVER	8/19/2018	Y (8/30/2019
Bennett, Richard	CONS	12/16/2019	N
Kearney, Daniel	LVER	1/12/2018	Y 5/24/2019
Stamper Robert	DVOP	5/16/2018	Y (7/14/2018

i. Such additional information as the Secretary may require.

N/A

## Unemployment Insurance (UI)

(OMB Control Number: 1205-0132)

The Unemployment Insurance (UI) program requires a State Quality Service Plan (SQSP) on a 2-year planning cycle that is a condition of receipt of administrative funding to administer the program. The SQSP is the State’s UI performance management and planning process that allows for an exchange of information between Federal and State partners to enhance the UI program’s ability to reflect their joint commitment to performance excellence and client-centered services. A formal two-year SQSP is submitted biennially. On the off years, States may be required to modify the SQSP with additional corrective action plans and narrative if they are failing any new performance measures, and they are required to provide updated budget documents, certifications, and assurances. ETA Handbook No. 336, 18th Edition provides detailed guidance for the preparation and submittal of the SQSP and

supplemental guidance is provided in an annual UIPL, issued as UIPL 15-19 for the FY 2020 SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chose to submit their SQSP through the Combined State Plan process.

## a. Contents of a Complete UI SQSP Package

A complete UI SQSP package includes the following documents, as described in Chapter 1, ETA Handbook 336, 18th Edition:

### 1. Transmittal Letter

A cover letter to the appropriate Regional Office (RO) transmitting all the required SQSP documents.

<https://www.tn.gov/content/dam/tn/workforce/documents/wfs/UITransmittal.pdf>

### 2. Budget Worksheets/Forms

Budget worksheets/forms and plan for program administration based on projected allocations received from the Federal partner. These forms include Worksheet UI-1 and SF 424, SF 424A and SF 424B. The SF 424A is only required if the State vary the quarterly distribution of base claims activity staff years.

<https://www.tn.gov/content/dam/tn/workforce/documents/wfs/UIBudget.pdf>

### 3. The State Plan Narrative

State Plan Narrative is a vital element of the SQSP that provides a vehicle for sharing with the Federal partner State-specific efforts that affect the administration of the UI Program. The State Plan Narrative allows the State to describe in a single narrative: a) State performance in comparison to the Government Performance Review Act goals; b) actions planned to correct deficiencies regarding UI programs, UI program reviews and reporting requirements; and c) results of customer satisfaction surveys (optional).

#### **State Plan Narrative Tennessee 2019-2020 Overview**

State priorities and the strategic direction the state has adopted to ensure continuous improvement.

During FY 2020 the Tennessee Department of Labor and Workforce Development intend to focus its efforts on the following:

Improving performance on the five Core Measures and the five Secretary Standards listed below that are currently below the minimum acceptable level of performance (ALP):

- Nonmonetary Separations Quality (Core)
- Nonmonetary Non-separations Quality (Core)
- Data Validation (Secretary Standards)
- Complying with the requirements of UI Data Validation,)

- Improper Payment Rate

Implementing measures that will help us meet or exceed the “GPRA goal” targets established by the USDOL for the below four performance areas:

1. Intrastate first payment timeliness
2. Facilitate Reemployment of Claimants
3. Detection of Overpayments
4. New employer liability determinations made within 90 days
5. Developing state-level priorities for the UI program that are consistent with the national priorities that have been established to prevent, detect, and recover improper payments, to improve program performance nationally, to emphasize better service delivery for the UI program by improving reemployment services to UI recipients, and to improve the process for detecting misclassified workers,
6. Implementing measures to correct deficiencies identified during the Tax Performance System (TPS) and Benefit Accuracy Measurement (BAM) program reviews, and Benefit Timeliness and Quality (BTQ)
7. Implementing a study to identify reasons for incorrect issue detection dates and/or determination dates.

### **Assessment of Performance**

Tennessee will consistently look to improve process and policy to improve performance in all categories.

### **Assessment of Tennessee’s performance with respect to Core Measures**

#### **Benefits Measures**

First Payment Promptness:

- (% of all 1st payments made within 14 days after the week ending date of the first compensable week in the benefit year (excludes work share, episodic claims such as DUA, and retroactive payments for compensable waiting period). The acceptable level of performance (ALP) is 87%.

Tennessee’s performance for the FY 2020 SQSP measurement period Tennessee’s performance for the 12 month period ending March 31, 2019 was 87.88%.

Nonmonetary Determination Time Lapse:

- (% of Separation and Nonseparation determinations made within 21 days of the Issue Detection Date.) The acceptable level of performance (ALP) is that 80% of the “combined” Separation and Nonseparation determinations are made within 21 days of the Issue Detection Date.

Tennessee’s performance for the FY 2019 SQSP measurement period (the 12 month period ending March 31, 2019) was 82.78%.

Separations Determination Quality:

- (% of Separation Determinations with a BTQ Quality Score equal to or greater than 95 points based on the evaluation results of quarterly samples selected from the universe of separation determinations.) The acceptable level of performance (ALP) is that 75% of the Separation determinations achieved a quality score of 95% or greater.

Tennessee's performance for the FY 2018 SQSP measurement period (the 4-quarter period ending March 31, 2019) was 63.06. We have attached a Corrective Action Plan (CAP) outlining the corrective measures we intend to take during FY 2020 to improve performance in this Core Measure.

Non-separation Determination Quality:

- (% of Nonseparation Determinations with a BTQ Quality Score equal to or greater than 95 points, based on the evaluation results of quarterly samples selected from the universe of nonseparation determinations.) The acceptable level of performance (ALP) is that 75% of the Non-Separation determinations achieved a quality score of 95% or greater.

Tennessee's performance for the FY 2019 SQSP measurement period (the 4-quarter period ending March 31, 2019) was 60.44%. We have attached a Corrective Action Plan (CAP) outlining the corrective measures we intend to take during FY 2020 to improve performance in this Core Measure.

### **Overpayment Measure**

Detection of Overpayments:

- (% of detectable, recoverable overpayments estimated by the Benefit Accuracy Measurement survey that were established for recovery)
- The acceptable level of performance (ALP) is an overpayment detection rate above 50%. Because states generally cannot detect and establish more than 80%-90% of estimated overpayments, states reporting ratios over 95% are also expected to explain the reasons for the higher than expected ratios.

Tennessee's performance for the most recent three year measurement period was 43.073 % based on BPC data for the period 04/01/2015-03/31/2018 and BAM data for the period 10/01/2016-09/30/2018.

We have attached a Corrective Action Plan (CAP) outlining the corrective measures we intend to take during FY 2019 to improve performance in this Core Measure.

### **Appeals Measures**

Average Age of Pending Lower Authority Appeals:

- (The sum of the ages, in days from filing, of all pending Lower Authority Appeals divided by the number of Lower Authority Appeals). The acceptable level of performance (ALP) for the Average Age of Pending Lower Authority Appeals Core Measure is 30 days.

The average age of Tennessee's Pending Lower Authority Appeals was 13.2 days for the FY 2019 SQSP measurement period, (the 12 month period ending March 31, 2018).

Average Age of Pending Higher Authority Appeals:

- (The sum of the ages, in days from filing, of all pending Higher Authority Appeals divided by the number of Higher Authority Appeals) The acceptable level of performance (ALP) for the Average Age of Pending Higher Authority Appeals Core Measure is 40 days.

The average age of Tennessee's pending higher authority appeals was 7 days for the FY 2018 SQSP measurement period (the 12 month period ending March 31, 2017).

Lower Authority Appeals Quality:

- % of Lower Authority Appeals with Quality Scores equal to or greater than 85% of potential points, based on the evaluation results of quarterly samples selected from the universe of lower authority benefit appeal hearings. The acceptable level of performance (ALP) is 80%.

Tennessee's performance was 100% for the FY 2019 SQSP measurement period (the 4-quarter period ending March 31, 2019).

## **Tax Measures**

### **Four-Year Federal Team Reviews**

Four-Year Federal Team Reviews

The most recent Fourth Year Federal Team Review was conducted in November 2017 on the 2016 calendar year. The team review findings stated, "The reviewers analyzed the CY 2016 state report of findings issued by the TDLWD TPS Reviewer in 2017. This report consisted of the findings and recommendations of the State TPS Reviewer. The TDLWD CY 2016 TPS review report was written very well. It was clear, concise and well annotated with appropriate graphs and charts. The Report stated that ten (10) of the thirteen (13) tax functions reviewed passed the review. This meant that reasonable assurance of accuracy and integrity was established for those tax functions. The report also revealed that Collections, Contributory Debits, and Successor Status determinations failed the sampling review. This was the third failure in a row for Collections; therefore, a Corrective Action Plan (CAP) was required for the 2018 State Quality Service Plan (SQSP). We reviewed the CAP and believe it could be effective."

- The Report also confirmed the State's monitoring results in all areas reviewed.
- The Area of Concern was SUTA Dumping. See details in the Status section below.
- The Review yielded no correctable findings and no official response is required.
- New Employer Status Determinations Time Lapse:
  - Is defined as the % of New Status Determinations within 90 days of the last day in the quarter in which the business became liable. The acceptable level of performance (ALP) is 70%.

Tennessee's performance was 82.3% for the FY 2018 SQSP measurement period (the 4-quarter period ending March 31, 2018).

Measure of Tax Quality:

- The Tax Performance System (TPS) assessment of the accuracy and completeness of the tax program is determined by scoring, on a pass/fail basis, samples of the 13 tax functions.
- The purpose of the Tax Performance System (TPS) is to measure the quality of State Unemployment Insurance (UI) tax operations, assist State Administrators in improving tax systems, and to help carry out Federal oversight and technical assistance responsibilities. The TPS review evaluates the quality of the UI Tax Operations in each of the major tax functions using the following methodologies.

- Computed Measures – UI tax data is reported by the state via the ETA 581 report and automatically computed into measures of timeliness and completeness for Status Determination, Report Delinquency, Collections, and Field Audit.

An internal audit of the State's UI Tax Operations involves two steps, a Systems Review and Acceptance Sampling. Upon completion of each review, a detailed memo is sent to the Director of Employer Accounts (Tax) Operations and the results are discussed with the appropriate staff.

**System Reviews:** The Systems Review examines the internal controls and quality assurance systems that help ensure accurate and timely operations in each of the major tax functions. This review is conducted once every four years.

**Acceptance Samples:** Each year random samples are examined from each tax function to confirm that controls and quality assurance systems are working effectively to produce accurate outputs. If as many as three out of sixty cases in a particular tax function fail the TPS review, it means that quality cannot be confirmed for that function. The acceptable level of performance (ALP) for a measure of tax quality is no more than three failures out of the 13 tax functions reviewed under TPS in a year and no single function failing the TPS review for three consecutive years.

The 2018 TPS Acceptance Sampling Reviews revealed that ten (10) of the thirteen (13) tax functions met the criteria for TPS as established by the USDOL; therefore, reasonable assurance of quality was confirmed for these tax functions. Collections, Taxpayer Reimbursing Debits, and Benefit Charging failed the review.

A Systems Review was conducted in 2018 on nine (9) of thirteen (13) tax functions and, at that time, revealed that the state was doing very well in five (5) of the nine (9) tax functions that were reviewed in 2018. Status Determinations-Successors, Field Audit, Contributory Debits, and Reimbursing Debits showed risks. These risks have been corrected. The next Systems Reviews will be conducted in 2020 for two of the tax functions that will be due for a systems review in that year. Two additional functions will be due for a review in 2021 and the remainder of the functions will be due again in 2022.

**Assessment of Major Tax Functions:**

- Note: The comments used in the below assessment of Major Tax Functions are extracts taken from the Tax Performance System (TPS) 2018 Annual Report.
- Status (New/Reinstate, Successors and Inactivation/Termination)
- SUTA Dumping
- As of April 2018, the SDDS system is operational and functioning properly. The issues found in 2016 with the SDDS system have been corrected. All of the 2018 wage information is in the process of being updated to the system.

**Computed Measures**

The Tax Performance result for timeliness of New Status Determinations in 90 days is above the 70% minimum level of performance established by the U. I. Performs for this core measure.

**Systems Review**

The 2018 Systems Review for Status Determinations identified a risk in the Recording of Transactions and Events.

A communication error within the automated FileNet system resulted in the electronic images not being properly captured and stored over a multi-week period. The IT staff investigated this matter and

discovered the issue which was causing this problem. The IT staff has resolved the issue and they are implementing actions to restore the missing images where possible.

Management is reviewing other possible measures and work reviews which may be implemented to ensure that all scanned images are properly stored and secured for future reference.

The remaining functions of Status Review indicated that all internal controls were present and operating effectively.

#### Acceptance Sampling

#### New/Reinstate Determinations

The 2018 acceptance sampling for New/Reinstate Determinations showed that fifty-nine (59) of sixty (60) cases passed the review; therefore, we can conclude that quality in this tax function was confirmed.

#### Successor Determinations

Since sixty (60) of sixty (60) cases passed the review, we can conclude that quality in this tax function was confirmed.

#### Inactivation/Termination Determinations

Successorship Determination acceptance sampling passed fifty-four (54) of sixty (60) cases; therefore, it failed the review. We can conclude that quality in the Status-Successorship function was not confirmed.

#### Report Delinquency

#### Computed Measures

2018 Computed Measures for Report Delinquency indicate that TN is above the National Average in each category for Contributory and Reimbursing employers.

#### Systems Review

The 2018 Systems Review revealed no risks and indicates that all internal controls were present and operating effectively.

#### Acceptance Sampling

The 2018 Acceptance Sampling passed all sixty (60) cases; therefore, we can conclude that quality in this tax function was confirmed.

#### Collections

#### Computed Measures

Computed Measures for 2018 reveal that, since 2017, contributory employer percentages have decreased .6% in timely payments (Indicator 1). Receivables declared uncollectible have increased .1% (Indicator 2) and unpaid contributions due have increased .4% (Indicator 3). Reimbursing employer percentages have decreased by 1.9% in timely payments (Indicator 4). Receivables declared uncollectible have decreased .5% (Indicator 5) and unpaid reimbursements due have increased 2.5% (Indicator 6).

#### Systems Review

The 2016 Systems Review for Collections revealed several risks and indicated that all internal controls were not present and operating effectively. We can conclude that reasonable assurance of quality does not exist in this tax function.

The Collections Unit is under new management and areas where risks were identified are currently being addressed.

There was a "Risk" identified in Training of existing employees in the collections unit. Per the new Director of U. I. Recovery, "UI Integrity Academy course on tax and benefit operations was offered as training to all personnel in the UI Recovery Unit. The Collection Manual is currently being updated to provide more guidance and procedures for collection activities. TPS training was offered to provide auditors with a better understanding of the review and its importance to the Agency. Weekly classes may be conducted after new processes and procedures are in place."

The Systems Review revealed a "Risk" in Review of Completed Work. The Director stated that, "Required random samplings have been added to the supervisor's job plan. Supervisory approval is required before liens, distress warrants, and injunctions are filed. This change has already proven effective as the supervisor has been able to provide one-on-one training as the need arises."

There were risks found where the employer is not being contacted timely for the most recent quarter of liability. The Director stated, "Modifications to the TRAC program have been put into place. The new queries should be more accurate in detecting accounts with new quarters of liability. Auditors have been given additional training and guidance on the importance of notifying employers before requesting a warrant or filing a lien. The collection timeline was adjusted to allow employers additional time to respond before a warrant is filed. The number of accounts assigned to each auditor was decreased due to increased staffing. This allows auditors to slow down and devote more time to each account.

The Director also states that, "Updates to the auditor's TRAC program and other policies are still ongoing. New reports to quickly identify accounts needing enforced collection actions released are being developed. Reorganization of existing support staff to become experts in a specific enforcement action is in the planning stage. Hopefully, this will increase accuracy and the speed in which actions are released."

#### Acceptance Sampling

The 2018 Acceptance Sample for Collections passed fifty-eight (58) out of sixty (60) cases; therefore, we can conclude that accuracy in this tax function was confirmed. Due to previous failures that had existed for three years, a Corrective Action Plan is still in place in the SQSP for the current year.

#### Field Audit

##### Effective Audit Measures Summary:

The Effective Audit Measures for 2018 reveal that Tennessee's total score was 12.9 which exceed the USDOL minimum score of 7.0. The percent of contributory employers audited scored 1.0%. This meets the minimum requirement of 1.0%. Additional emphasis focused on the percent of wages changed as a result of the audit which is 4.6%. This is 2.6% above the minimum requirement of 2.0%. The percent of the state's total wages that were audited is 1.3% which is .3% above the minimum requirement of 1.0%, and the average number of misclassified workers discovered per audit scored 6.0 which are 5.0 above the minimum requirement of 1.0.

Effective Audit Measures 2018			
Factor	Description	Minimum Score	TN
1	Percent of contributory employers audited	1.0%	1.0%
2	Percent of wages changed as a result of the audit	2.0%	4.6%
3	Percent of the state's total wages that were audited	1.0%	1.3%
4	Average number misclassified workers discovered per audit	1.0	6.0
Total Score		7.0	12.9
Minimum Level of Achievement Score		5.0	5.0
Additional Emphasis Requirement		2.0	7.9

**Table 31: TN Unemployment Insurance - Effective Audit Measures**

### Systems Review

The 2018 Systems Review for the audit function revealed a risk in the Review of Completed Work. Multiple audits included Supplemental Premium and Wage Reports, Employer Change Forms and/or Update Owner Master File Forms which were not properly posted to the employers' accounts. Management is implementing new processes through which periodic sampling will be occur to ensure that all updates are properly posted to employer accounts going forward.

The Systems Review further indicated that all remaining internal controls were present and operating effectively. We can conclude that reasonable assurance of quality exists in this tax function.

#### Acceptance Sampling

The scope of the review focused on audits completed in all four quarters of 2018. The Acceptance Sampling confirms that the state is doing a good job in the audit function. Since all sixty (60) of the cases passed this review, we can conclude that quality in this tax function was confirmed.

#### Cashiering

##### Systems Review

The 2018 Systems Review for Cashiering revealed no risks and indicated that all internal controls were present and operating effectively. We can conclude that reasonable assurance of quality exists in this tax function.

##### Estimation Sampling

Out of a sample size of 218 items, the value to pass is 55.6%. For paper payments received, 208 items or 95.4% totaling \$70,386.73 or 90.5% of the total dollar amount was deposited timely. At the end of the 2nd quarter, 2017, electronic fund transfers were 79.8% which allows us to reduce the sampling size of paper checks reviewed from 500 checks to 200 checks. When the actual review was conducted, the EFT percentage was 79%.

After factoring in electronic fund transfers, 98.01% of the total dollar amount was deposited within three (3) banking days. Per USDOL ET Handbook 407, since this is equal to or greater than the

Value to Pass of 55.6%, the reviewer must conclude that a standard of 90% of the dollar amount being deposited timely during the quarter was achieved.

There were ten (10) checks that were not deposited timely. Five (5) checks were found to be deposited late due to the accounts being new setups. These accounts had to be established by Employer Services before the checks could be processed and credited to the appropriate account number.

Of the remaining five (5) checks, three were processed within 4-5 days after receipt. The remaining two (2) checks were discarded in error.

The Supervisor of the Cashiering Unit stated that, "these errors are due to dependence on assistance from staff outside the Report Audit/Cashiering Unit. The individuals that assist us during this rush period are attempting to provide assistance while maintaining their regular job duties."

Due to the TPS Review, the Director of Employer Account Operations has implemented new procedures within the Cashiering Unit to ensure that all checks are accounted for and deposited in the bank.

#### Exemplary Practices

Employers have the option of paying U. I. taxes using either an ACH credit or ACH debit. For the 2nd quarter, 2018, 79.0% of the dollar amount received was electronic funds transfers. This is a .8% decrease from 2nd quarter 2017. When employers file and pay electronically, it reduces errors; as well as, reduces the amount of staff necessary to process the paper checks.

Per ET Handbook 407, when the EFT dollars reach 50% or greater of the payments received, TPS will reduce the Cashiering Estimation sample size and the value to pass. As the EFT dollars continue to increase, the sample size and value to pass will continue to decrease until the EFT dollars reach 90%. At that point, the sampling will no longer be conducted because all EFT payments are considered timely.

Account Maintenance (Contribution Report Processing, Debits/Billings, Credits/Refunds, Benefit Charging, and Tax Rates)

#### **Contribution Report Processing Systems Review**

The 2018 Systems Review for Report Processing revealed no risks and indicated that all internal controls were present and operating effectively. We can conclude that reasonable assurance of quality exists in this tax function.

#### Acceptance Sampling

The universe from which the samples were selected was comprised of all contributory employers who were active during the first quarter of 2018. The universe was identified on March 12, 2018.

The purpose of acceptance sampling is to assure that the contribution report processing function is accurately processing the quarterly contribution "premium" reports, to confirm that the agency maintains accurate quarterly contribution information, and to determine that employers who do not file timely are being properly identified.

Since all sixty (60) cases passed this review, we can conclude that accuracy in this tax function was confirmed. According to TPS guidelines, if three (3) or more cases are not acceptable, then quality in a particular tax function cannot be confirmed. Out of the samples tested, those first quarter 2018 reports which were not filed were properly identified on the

Master Delinquent Listing.

#### Contributory Employer Debits/Billings Systems Review

The 2018 Systems Review for Debits/Billings – Contributory Employers identified a risk in the Recording of Transactions and Events section of the review.

There were no copies of some of the paper reports on FileNet. This was due to a connection problem between the Fairfax and FileNet systems. Per the Director of Employer Accounts Operations, “The Fairfax System did create/transmit the files to deposit monies in the bank, and post reports/payments to the mainframe. The time frame was approximately 3 weeks. The IT division is working to restore the images as described below.”

The IT staff has been working to resolve the issue. The IT Director stated, “We have worked with the vendor to resolve the issue of reloading the specific batches on Fairfax that are missing from June 2 – 22, 2018. We have validated a plan to recover the remaining updates to the FileNet system. It is going to require a 14-step procedure that will begin Monday and will run thru Monday night to complete. The expectation is that Greg will complete the scripting required this weekend, and we will begin the steps to resolve it without missing any batches for FileNet upload. I expect it may even require FileNet confirmation as we move through each phase.”

#### Acceptance Sampling

Two cases were discarded from the sampling leaving fifty-eight (58) cases in the review. This was a system error. Per Clay Whitmire, IT Department, the program included records that should not have been in the universe. This error was corrected on June 27, 2018.

Per ET 407 Handbook, “if cases that should not be in the universe are selected, do not replace them; instead, continue extracting samples. As long as the sample contains a minimum of 53 valid cases, two cases can still fail and the results of the Acceptance Sample will remain consistent with that of 60 case samples.”

According to TPS guidelines, if three (3) or more cases are not acceptable, then quality in a particular tax function cannot be confirmed. Since all of the fifty-eight (58) cases passed this review, we can conclude that accuracy in this tax function was confirmed.

There were three (3) cases that passed the review but were found to be problematic.

#### Reimbursing Employer Debits/Billings Systems Review

The 2018 Systems Review for Debits/Billings – Reimbursing Employers identified a risk in the Review of Completed Work. It was found that the billing notices were not reviewed prior to mailing. This resulted in a failure of the Acceptance Sampling for 2018.

Statements for April 2018 were generated on April 17th before payments, that were received prior to the due date, were posted to the employer’s account. This caused the Acceptance Sampling universe and the sampling cases to be far too large. There are normally 36 cases on average and this year there were 56 cases.

All payments received before the due date should be posted to the employers account before statements are generated to avoid incorrect billing notices. One of the downfalls of having a batch system is that, if there is one error in the batch, the entire batch is delayed until the error is corrected. Therefore, payments that were received before the due date and should have been posted to the system were held up until all errors were corrected. Some of these batches were not processed and payments were not posted when billing statements were generated.

The statements could have been held until April 20th which is the date that most of the payments posted. A review of payments (credits) received before the due date but not posted to the employers account could be conducted before statements are generated to avoid incorrect billing notices. Management could sign off on the request to generate statements as an additional check to make sure all payments are posted.

Mark Howell, Director of Employer Accounts Operations, responded, "As stated previously, a review of all debits and credits is conducted prior to posting. This is the information which appears on the billing notices. "As director, I will take a more active role in ensuring errors have been resolved prior to the printing of monthly statements until the unit is fully staffed and trained."

Another issue is that the Accounting Unit has a shortage of staff and an inexperienced staff as well as a new Supervisor. The staff thought that they had to run statements on a specific date listed on the "Run Schedule" and did not know that that date could be postponed for a few days in order to allow time for the batch error to be corrected. This caused inaccurate billing statements to be sent.

The Director of Employer Accounts Operations is in the process of hiring additional staff.

The exemplary practices include the following:

When issues are identified, Employer Accounts Operations acts very quickly to get the issues resolved. They always strive to meet or exceed all compliance measures. TPS and Employer Accounts Operations work well together to resolve any issues due to open communication.

#### Acceptance Sampling

The scope of the review focused on debits issued on 3-17-18 to reimbursing employers for benefits paid during February 2017. These debits remained unpaid after 4-16-18 which was the due date. Billing notices were generated on 4-17-18 for the past due amounts.

Since thirteen (13) of fifty-six (56) cases passed this review, we can conclude that accuracy in this tax function was not confirmed. Based upon the universe size of two hundred forty-six (246) transactions, two (2) errors are allowed. Since forty-three (43) cases were found to be unacceptable, quality in this tax function could not be confirmed.

All of the cases failed due to the same error. A large portion of the payments that were received prior to the due date of

April 16th had not been posted to the employers account. Statements for past due amounts were generated on April 17th and included accounts that had payments made but not yet posted. This caused the Acceptance Sampling universe and the number of sampling cases to be far too large. There are normally 36 cases on average in the review and this year there were 56 cases.

All payments received before the due date should have been posted to the employers account before statements were generated to avoid incorrect billing notices. The statements could have been held until April 20th which is the date that most of the payments posted.

#### **Contributory Employer Credits/Refunds Systems Review**

The 2016 Systems Review for Credits/Refunds revealed a "Risk" in Recorded Information and Instructions and in Systems to Assure Execution of Events. As of 2017 both of the issues have been resolved.

#### Acceptance Sampling

Since all sixty (60) cases passed this review, we can conclude that accuracy in this tax function was confirmed.

### **Employer Benefit Charging Systems Review**

Due to the implementation of the new GUS System, a Systems Review was conducted on Benefit Charging for 2017. Areas where controls are lacking are identified as at "Risk".

A "Risk" was found in Training. Per TPS Operations Handbook 407, training should be provided when needs are identified from reviews of finished work. At present, there are no reviews conducted. The new supervisor will begin reviewing completed work and providing training on any issues identified.

Several "Risks" were found in the section for System to Assure Execution of Events.

Per the TPS Operations Handbook 407, if the State uses an automated benefit charge system to apply charges to employer accounts or to the pool account, a review should be performed every time a program change is made. Since the implementation of GUS, no reviews have been conducted; therefore, a risk was assigned. When errors are discovered through the normal course of business, an OPC is sent to GSI to correct the error.

Per the TPS Operations Handbook 407, verification procedures should be in place to assure that benefit charges are correctly made by comparing information sources to employer account transaction records. Out of State charges were doubled in August 2017. There was no verification process in place to compare information sources to employer account transaction records after a GUS system update; therefore, this error was not detected and corrected. An OPC has been sent to correct these errors and also to correct the cause of the errors in the system.

Per the TPS Operations Handbook 407, the State should reconcile benefits charged with benefits paid. All benefit checks issued to a claimant should be reconciled with the benefit charges that are charged to the claimant's employer(s) account(s) or the pool account. Normally, reconciliation is prepared annually before the annual rate run; however, no reports were available to reconcile the accounts. Numerous requests have been made by our agency for these reports. An OPC will be submitted to request queries in order to reconcile the differences found on the Benefits Paid Reconciliation Report.

There was a "Risk" assigned to Review of Completed Work. Per the TPS Operations Handbook 407, the State should be conducting systematic reviews for accuracy of the benefit charge information being posted to the employer's account. The new GUS System was supposed to handle every aspect of the Benefit Charging Function except granting non-charging; therefore, no reviews have been conducted. The new Supervisor will begin reviewing all Benefit Charging functions.

An exemplary practice for the Benefit Charging function is the online quarterly charge statement report. This is available to all employers. It gives the employers additional opportunities to question charges. Any errors not discovered in the original benefit charge process can be reviewed by the employer and corrected by the Benefit Charge Unit. The Benefit Charge Unit provides excellent and responsive customer service to employers by researching and providing information about questions on a quarterly basis.

The review indicated that all other internal controls were present and operating effectively.

### **Acceptance Sampling**

Since fifty-six (56) of sixty (60) cases passed this review, we can conclude that accuracy in this tax function was not confirmed. According to TPS guidelines, if three (3) or more cases are not acceptable, then quality in a particular tax function cannot be confirmed.

All of the errors were a result of GUS system errors. An OPC has been submitted to have the errors corrected.

### **Tax Rates Systems Review**

Due to the implementation of the new GUS System, a Systems Review was conducted on Tax Rates for 2017. Areas where controls are lacking are identified as "Risk".

The 2017 Systems Review for Employer Tax Rates revealed no risks and indicated that all internal controls were present and operating effectively. We can conclude that reasonable assurance of quality exists in this tax function.

#### Acceptance Sampling

The next review of Tax Rates was scheduled for 2019; however, the Benefit Charge Acceptance Sampling failed the 2018 review, an Acceptance Sampling Review was conducted in 2018.

Since all sixty (60) cases passed the review, we can conclude that quality in this tax function was confirmed. If three (3) or more cases are found to be unacceptable, then quality in a particular tax function cannot be confirmed.

See attached Corrective Action Plan (CAP) relating to the Core Measure of First Payment Promptness that addresses this Secretary Standard as well.

#### Reemployment Measure

##### Facilitate Reemployment:

(% of UI claimants who are reemployed within the quarter following the quarter in which they received their first UI payment)

Based on Tennessee's 6.6% TUR for calendar year 2014 and the 67.3% of claimants receiving first payments during the 12-month period ending September 30, 2014 who were not exempt from work search, Tennessee's ALP for FY14 is 64%. For the 12-months ending December 31, 2014, 64.8% of Tennessee's UI claimants were reemployed by the end of the first quarter after the quarter in which they received their first payment.

Assessment of Tennessee's performance with respect to USDOL Secretary Standards which are currently still in federal regulation.

#### **First Payment Time Lapse 14/21 days Intrastate UI full weeks**

(% of Intrastate UI 1st Payments (full weeks only) made within 21 days after the week ending date of the first compensable week in the benefit year).

The Secretary Standard is 87%. Tennessee's performance was 89.81% for the FY 2019 SQSP measurement period (the 12 month period ending March 31, 2019).

#### **First Payment Time Lapse 35 days Intrastate UI full weeks**

(% of Intrastate UI 1st Payments (full weeks only) made within 35 days after the week ending date of the first compensable week in the benefit year).

The Secretary Standard is 93%. Tennessee's performance was 96.99 % for the FY 2019 SQSP measurement period (the 12 month period ending March 31, 2019). Performance in this Measure.

#### **First Payment Time Lapse 14/21 days Interstate UI full weeks**

(% of Interstate UI 1st Payments (full weeks only) made within 21 days after the week ending date of the first compensable week in the benefit year).

The Secretary Standard is 70%. Tennessee's performance was 88.46% for the FY 2019 SQSP measurement period (the 12 month period ending March 31, 2019).

#### **First Payment Time Lapse 35 days Interstate UI full weeks**

(% of Interstate UI 1st Payments (full weeks only) made within 35 days after the week ending date of the first compensable week in the benefit year).

The Secretary Standard is 78%. Tennessee's performance was 97.17% for the FY 2019 SQSP measurement period (the 12 month period ending March 31, 2019).

#### **Lower Authority Appeals 30-day Timeliness**

(% of Lower Authority Appeals decided within 30 days of filing). The Secretary Standard is 60%. Tennessee's performance was 41.04% for the FY 2019 SQSP measurement period (the 12 month period ending March 31, 2019).

Lower Authority Appeals 45-day Timeliness (% of Lower Authority Appeals decided within 45 days of filing). The Secretary Standard is 80%. Tennessee's performance was 94.26 % for the FY 2019 SQSP measurement period (the 12 month period ending March 31, 2019).

Coordination with other plans.

We realize that the UI program does not stand alone and that it is the wage replacement component of an overarching effort to return a worker to suitable work. Accordingly, we plan to continue working with our Job Service component to develop and maintain a seamless process designed to facilitate the reemployment of UI claimants. (See comments under "National Direction" with respect to the "Reemployment of UI Claimants").

#### **Federal Emphasis regarding Government Performance and Results Act (GPRA) goals)**

State performance compared to the GPRA goals.

#### **Make Timely Benefit Payments.**

Target: 87.1% of intrastate first payments for full weeks of unemployment will be made within 14/21 days from the week ending date of the first compensable week. Tennessee's performance for the 12 month period ending March 31, 2019 was 89.45%.

#### **Detect Benefit Overpayments.**

Target: Overpayments established will be at least 50.00% of the estimated detectable, recoverable overpayments. For the 12 months ending March 31, 2019, Tennessee established 43.73% of the estimated detectable, recoverable overpayments. Tennessee will examine business processes surrounding the detectable overpayments. We will examine all crossmatches and work with Geographic Solutions to improve those processes. We are also working with Lexis Nexis Fraud detection and prevention product to improve detection of higher risk claimants through their analytic systems. Tennessee implemented a new claims operating system GUS during this time frame and we have been working with them through their Online Project Communication System (OPC) to correct deficiencies we have in these processes.

#### **Establish Tax Accounts Promptly.**

Target: 88.9% of status determinations for new employers will be made within 90 days of the end of the first quarter in which liability occurred. Tennessee's performance for the 12 month period ending March 31, 2019 was 83.97%.

#### **Facilitate the Reemployment of Claimants.**

Target: 64.7% of UI claimants will be reemployed by the end of the first quarter after the quarter in which they received their first payment. For the 12-months ending December 31, 2014, 64.8 % of UI claimants were reemployed by the end of the first quarter after the quarter in which they received their first payment.

Actions taken to improve performance in GPR A goals.

Facilitate the Reemployment of Claimants.

(See comments under "National Direction" with respect to the "Reemployment of UI Claimants".

Establish Tax Accounts Promptly.

The Employer Services Unit is responsible for establishing and maintaining employer accounts. While the staffing level of the unit has decreased, Tennessee continues to meet the goals established by Tax Performance System. While Tennessee is below the national average for new status determinations, we have exceeded the desired level of achievement by a wide margin. The statistics show that Tennessee continues to improve in this measure with the most recent data showing 86.13% of employers established within given times, exceeding the goal by 15.0%.

#### **National Direction**

Tennessee continues to align its strategies with the below national priorities that have been established for the UI program for FY 2020. The USDOL has also established the following additional priorities for FY 2020:

Improving State Capacity to administer and operate the UI program effectively

For FY 2020 one of our top priorities will be to continue to improve work processes for the UI program. This is being accomplished by Lean Events and examination of internal work process. SBR money is being requested to improve work process, eliminate back logs, and recover overpayments. Continual training will occur to build staff knowledge in all aspects of UI. We will take advantage of technical assistance offered by USDOL as well as use the UI Integrity Center for Excellence, and continue to use the UI Community of Practice.

Improved Prevention, Detection, and Recovery of UI Improper Payments

For FY 2020, our top priority continues to be the prevention, detection, and recovery of improper payments. We will continue to examine UI Integrity functions through Integrity Task Force, make recommendations for continuous improvement, and cultivate a sense of ownership for program integrity within the UI system. We have included an updated UI Integrity Strategic Plan with our FY 2019 State Quality Service Plan to address current state-specific root causes of improper payments.

Improving Program Performance Nationally

We have indicated throughout our State Plan Narrative and associated Corrective Action Plans how we intend to help the USDOL improve program performance nationally.

#### **Re-Employment of UI Claimant**

Tennessee has made a strong and focused effort in the past year to place an emphasis on re-employing unemployment insurance claimants. We ensure that claimants have access to the full continuum of workforce services through One-Stop Career Centers, both virtual and in-person, as well as through Rapid Response and Re-Employment Services Eligibility Assessment (RESEA) activities. Tennessee is continuing to implement new software programs that will result in a full integration of UI and workforce programs with the goal of improving employment outcomes for UI claimants. Below is an outline of what we have accomplished in the past year in this regard as well the plans and activities we will be implementing over the next year. U.S. DOL has mandated that UCX claimants be selected for REA in addition to those claimants most likely to exhaust. Tennessee has implemented this process as of August 2015. Tennessee has also expanded RESEA from 23 one stop centers to 54 centers across the state via a partnership with WIOA and Local Workforce Development Area Partners.

VOS/JOBS4TN -All unemployment claimants are created a job service application at the moment they file a UI claim. Tennessee is moving forward with the full implementation of its jobs4tn.gov database by launching the Virtual One Stop system (VOS). VOS is essentially a virtual career center/one-stop with workforce service tools and resources available online, similar to the services you could find in a brick and mortar center. All UI claimants will be created VOS accounts/profiles at the time they file their claim.

1. Re-Employment Services Eligibility Assessment (REA) services- Tennessee currently operates the RESEA program in 54 one-stop career centers across the state. RESEA orientations and subsequent RESEA follow ups are conducted 4 days a week across the state. Through the RESEA program UI claimants that are most likely to exhaust receive access to workforce services as well referrals to re-employment services, training, and other supportive services. In addition to these services participants conduct a UI eligibility review, an assessment, and work with a staff member on an employment development plan per each visit. RESEA participants also receive extensive service in regards to job matching and job placement.
2. Job Fairs & Workshops- TDLWD participates in numerous job fairs across the state. TDLWD makes aggressive efforts to contact claimants to extend invitations to the job fairs in their community. Many of our Career Centers conduct monthly or weekly workshops with the unemployed to help in their re-employment efforts.
3. Mobile Workforce Services Career Coach Units- TDLWD has 3 Mobile Career Coach Units stationed in each grand division of the state. The mobile units are encompassed into a RV type unit that can provide services similar to a One-Stop Career Center. The mobile units are heavily utilized in rural areas to provide the unemployed access to workforce services. The units are also utilized at Rapid Response events.
4. Rapid Response Program- TDLWD has a rapid response plan and team in place across the state, coordinated in conjunction with the local workforce investment act programs. The rapid response program responds to mass lay-offs to provide the employees with access to workforce related services and attempts to help those affected become re-employed as quickly as possible.
5. Employment Toolkits- TDLWD has developed an Employment Toolkit. The toolkit is accessible both in online format and hard copy. The toolkit serves as a guide to unemployment claimants to help guide them through the process to re-employment.
6. Re-Employment Workbooks- TDLWD has developed a Re-Employment Workbook to assist the unemployed with becoming re-employed. The workbook is available in hard copy and will

soon be available online to anyone that needs it.  
Addressing Worker Misclassification

For the fourth year in a row, Tennessee surpassed the Effective Audit Measures set forth by the Tax Performance System. Tennessee is one of the five states in the eight-state region to exceed all four factors and achieve a passing score. Tennessee's auditors are well-trained to determine if a worker is properly classified.

Tennessee strives to ensure employers are educated on proper worker classification by participating in New Employer workshops and Business Tax seminars throughout the state. The Handbook for Employers discusses worker classification and the tests and laws used to make such a determination.

Tennessee continues to seek out new methods of identifying improperly classified workers. Tennessee successfully enrolled in the Governmental Liaison Data Exchange Program (GLDEP), and in 2013, received the first 1099-MISC extract from the Internal Revenue Service. This data will be used to select employer accounts for audit. Tennessee expects the factors used in the Effective Audit Measures to increase as we move forward

### **Program Review Deficiencies**

1. Causes for failures to conduct required reviews/activities, e.g., BTQ and Data Validation.
2. In Tennessee, the Nonmonetary Determinations Quality sample Separations-Non Separations failed validation and we were not able to submit benefit populations, 3, 4, 12, 1for validation during VY19
3. Plans to conduct the reviews as required. (See Corrective Action Plan submitted with this SQSP)

### **Results of Self-Assessment**

The first completed UI Benefit Operations State Self-Assessment review cycle resulted in a total of thirty-eight (38) findings over ten of the fourteen functional and program areas reviewed within UI benefits operations. Upon completion of the review cycle, the UI agency administrator, assistant administrator and key program management staff conducted a series of meetings in which they formulated plans for operational improvements to correct thirty-two (32) of the issues identified. Eighteen (18) of these issues have now been resolved while the corrective action plans developed to resolve fifteen (15) of these issues will be implemented during FY 2020. The five (5) remaining issues identified are for the RESEA program. The UI administrators and RESEA management staff have scheduled a meeting to discuss the five RESEA program issues and to formulate corrective action plans to resolve those.

### **Program Deficiencies**

Plans to correct deficiencies identified through required program reviews.

#### **Plans to correct deficiencies identified through Benefit Accuracy Measure (BAM) reviews.**

See corrective action plan with SQSP.

#### **Plans to correct deficiencies identified through Benefits, Timeliness, and Quality (BTQ) reviews.**

(See Corrective Action Plans submitted with this SQSP for Nonmonetary Determinations Quality)

#### **Plans to correct deficiencies identified through UI Data Validation**

(See Corrective Action Plan submitted with this SQSP)

### **Reporting Requirements Deficiencies**

TN was late with the ar8414 fiscal report for January 2019. It has been submitted. Agency staff saved it to the SUN System but failed to transmit it. This report has been transmitted at this time. At this time TN is current on all reports but will examine all reports for timeliness and submit any that have not been submitted.

#### Customer Service Surveys (optional)

In September of 2012 Tennessee kicked off a new statewide Customer Service Training campaign entitled Customer Focused Government which was designed to change the culture of the entire state and move Tennessee forward by providing G.R.E.A.T. customer service. This campaign stressed the 5 keys to G.R.E.A.T. customer service:

- Greet - Making first impressions count
- Relate – Building trusting relationships
- Exceed – Going above and beyond expectations
- Affirm – Recognizing customers as the most important asset
- Thank – Showing customers appreciation

Below are some of the features of that customer service training which has now been completed statewide:

- Developed specifically for the State of Tennessee
- Captures the essence of customer focused government
- In alignment with Governor Haslam's TNFORWARD initiative
- A collaborative effort with Bruce Loeffler, author of One Minute Service

Creates agency-specific behaviors for demonstrating G.R.E.A.T. customer service

Other (e.g., approach to maintaining solvency, requests for technical assistance)

### **2019 Summary of Tennessee ES Law Changes**

#### **Public Chapter 337 (HB 539/ SB 466)**

Tennessee Public Chapter 337 (HB 539/ SB 466) amended the provisions which define covered employment under T.C.A. § 50-7-207 by replacing the statutory test used to determine whether a worker is an employee or an independent contractor. Effective January 1, 2020, the Internal Revenue Service's (IRS) twenty factor test will replace the ABC test for this purpose.

#### **Public Chapter 334 – HB 0451/SB 0119)**

Tennessee Public Chapter 334 amended the state law sunset provisions under T.C.A. Title 4 to extend the department of labor and workforce development to June 30, 2020.

#### **Public Chapter 289 (SB 0122/HB 0454)**

Tennessee Public Chapter 289 amended the state law sunset provisions under T.C.A. Title 4 to extend the state unemployment compensation advisory council to June 30, 2023.

Assurances:

- Assurance of Equal Opportunity (EO)
- Assurance of Administrative Requirements and Allowable Cost Standards
- Assurance of Management systems, Reporting, and Recordkeeping
- Assurance of Program Quality
- Assurance on Use of Unobligated Funds
- Assurance of Prohibition of Lobbying Costs (29 CFR Parts 93)
- Drug-Free Workplace (29 CFR Part 98)
- Assurance of Contingency Planning

Provide the most recent dates for the following:

- Information Technology (IT) Contingency Plan Implemented: August 24, 2011
- IT Contingency Plan Reviewed/Updated: September 2018
- IT Contingency Plan Tested: November 30 –December 4, 2018

**Assurance of Conformity and Compliance.**

**Assurance of automated Information Systems Security.**

Provide the most recent dates for the following:

- Risk Assessment Conducted: November 2018
- System Security Plan Review/Updated: November 2018
- Assurance of Confidentiality

## 4. Corrective Action Plans (CAPs)

CAPs are expected as a part of the SQSP when State’s annual performance does not meet the established criteria for core measures, Secretary’s Standards, UI program, assurances, and other program deficiencies identified in the annual SQSP guidance provided by the Department. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

<http://www.tn.gov/content/dam/tn/workforce/documents/wfs/UITNFY20AlternateYrSQSPPlanCAP.xlsx>

## 5. UI Program Integrity Action Plan (UI IAP)

The UI IAP outlines the strategies the State will undertake during the planning period regarding the prevention reduction and recovery of UI improper payments.

<https://www.tn.gov/content/dam/tn/workforce/documents/wfs/UIIntegrityActionPlan.pdf>

## 6. Organizational Chart

The organization chart must conform to the requirement for delivery of service through public employment offices, or such other designated providers as the Secretary may authorize; show the State's configuration from the Governor of the State down to the point of Employment Service and UI customer service delivery; and provide sufficient detail to show each organizational unit involved and the title of the unit manager.

<https://www.tn.gov/content/dam/tn/workforce/documents/wfs/UIOrgCharts.pdf>

## 7. SQSP Signature Page

The State administrator must sign and date the SQSP Signature Page. By signing the Signature Page, the State administrator certifies that the State will comply with all the assurances and activities contained in the SQSP guidelines.

Though a State needs to submit the complete SQSP package on a 2-year cycle, there are certain documents contained in the SQSP package which are required to be submitted by States annually as part of the off-year submission. The documents which are required to be submitted annually are considered a modification to the complete SQSP submitted the previous year. Since funds for State UI operations are appropriated each year, each State is required to annually submit the transmittal letter, budget worksheets, organizational chart and the signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs.

Since the UI program is a required one-stop partner, States have the option of including UI in the Combined State Plan authorized by WIOA sec. 103.

<https://www.tn.gov/content/dam/tn/workforce/documents/wfs/UITNFY20signedSQSPSignaturePage.pdf>

### b. Requirements for States electing to include UI in the Combined State Plan

States that elect to include UI in the Combined State Plan must:

1. Submit an SQSP in the following manner depending on their timing in the SQSP cycle:

A. If a State is in the first year of their 2-year cycle, the State is required to submit the most recently approved complete SQSP package. A complete SQSP package will include the Transmittal Letter, Budget Worksheets/Forms, State Plan Narrative, CAPs (including the milestones and the completion date for each milestone), the UI IAP, Organizational Chart, and the SQSP Signature Page. One of the key goals for the UI program is to ensure that claimants are able to

successfully return to work. As such, the SQSP State Plan Narrative must provide a discussion of the plan coordination with other WIOA Combined Plan programs to ensure a coordinated effort and integrated service delivery.

The UI Division is currently in the second year of the 2-year SQSP cycle.

B. If a State is in the second year of the 2-year cycle, the State is required to submit the most recently approved complete SQSP package with a modification that must include the Transmittal Letter, Budget Worksheets/Forms, Organizational Chart, and the SQSP Signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

The UI Division has included the most recently approved SQSP package in this State Plan.

2. Submit the required off-year SQSP components as a modification to the Combined State Plan on the same cycle as the regular SQSP process which must be approved by September 30th each year

The UI Division understands and acknowledges this requirement.

## Senior Community Service Employment Program (SCSEP)

(OMB Control No. 1205-0040)

### a. Economic Projections and Impact

1. Discuss long-term projections for jobs in industries and occupations in the State that may provide employment opportunities for older workers. (20 CFR 641.302(d)) (May alternatively be discussed in the economic analysis section of strategic plan.)

According to the TDLWD's Occupational Data Unit, the top five industries and occupations in the state that may provide employment opportunities in Tennessee are: 1) Automotive Manufacturing, 2)

Energy, 3) Film Production, 4) Manufacturing, and 5) Healthcare. Social assistance, professional and business services and construction, and education sectors are projected to gain the most jobs. (Source: Bureau of Labor Statistics News Releases, 2012.) Education, and Professional and Business Services are the two industries in which older workers are expected to gain employment. Several occupations are prominent in Tennessee; however, the occupations that are the most prevalent among seniors in Tennessee are: office and administrative support, education, training, and library support, community and social Service occupations. During Program Year 2018-2019 Tennessee saw an increase in the amount companies calling to become SCSEP Host Agencies. Furthermore, sectors, such as healthcare and business, as projected have grown quickly. Therefore the need for an older worker force will similarly, still continue to rise with that need.

## **2. Discuss how the long-term job projections discussed in the economic analysis section of strategic plan relate to the types of unsubsidized jobs for which SCSEP participants will be trained and the types of skill training to be provided. (20 CFR 641.302(d))**

As previously stated, healthcare and the business services sectors are projected to have the fastest job growth between 2016 and 2022. This could translate into career opportunities for SCSEP participants. Tennessee understands the importance of creating an atmosphere where participants have multiple, career-sector opportunities and training opportunities needed to enter into attractive sectors, along with supporting the Workforce System's employment goals for low-income older workers by building sustainable business relationships with industries across the state.

## **3. Discuss current and projected employment opportunities in the State (such as by providing information available under §15 of the Wagner-Peyser Act (29 U.S.C. 491-2) by occupation), and the types of skills possessed by eligible individuals. (20 CFR 641.325(c))**

Current employment opportunities consist of non-profit organizations (Goodwill), government agencies, and health care opportunities. SCSEP coordinators are tasked with reaching those that are most in need that includes those individuals with disabilities, Veterans, the homeless and those whom live in rural areas. Serving these populations present unique issues that make it harder for them to gain employment, however, we (all SCSEP coordinators) are currently reaching out to both public and private businesses in an effort to provide more opportunities in those communities where participants reside.

### **b. Service Delivery and Coordination**

**1. A description of actions to coordinate SCSEP with other programs. This may alternatively be discussed in the State strategies section of the strategic plan, but regardless of placement in document, must include:**

**A. Planned actions to coordinate activities of SCSEP grantees with WIOA title I programs, including plans for using the WIOA one-stop delivery system and its partners to serve individuals aged 55 and older. (20 CFR 641.302(g), 641.325(e))**

WIOA requires SCSEP grantees to be partners in or with each local one-stop system and to enter into a Memorandum of Understanding, describing how services will be provided with the Local Workforce Investment Board. In Tennessee, the U.S. Department of Labor allocates funds (to operate SCSEP) to Tennessee Department of Labor & Workforce and to two national organizations. The national organizations are NCOA and SSAI. Tennessee is divided into 9 Local Workforce Development Areas (LWDAs). SCSEP participants are referred to one of the 20 comprehensive American Job Centers, across the state, providing comprehensive, workforce development-related activities, including updating interviewing skills, resume preparation, job placement services and providing supportive services.

**B. Planned actions to coordinate activities of SCSEP grantees with the activities being carried out in the State under the other titles of the Older Americans Act (OAA). (20 CFR 641.302(h))**

Current services offered to participants such as free transportation services to community service assignment, free physical exams, and access to nutrition benefits through SNAP E&T will continue through established partnerships. Also, transportation is provided for participants to the nearest American Job Center for assistance accessing and using the internet as requested.

The SCSEP program plans to explore the possibility to partner with meals on wheels to provide nutrition for those participants, who aren't readily able to drive or has a particular barrier preventing them from driving, such as a disability. Also, the SCSEP program will begin to actively recruit new host agencies which will give participants a more diverse choice in acquiring new skill sets. The SCSEP program plans to bring new speakers in during monthly training sessions to speak with participants concerning health promotion and disease prevention. Finally, a more efficient and effective referral process will be created for those participants whom need additional services in a timely manner.

**C. Planned actions to coordinate SCSEP with other private and public entities and programs that provide services to older Americans, such as community and faith-based organizations, transportation programs, and programs for those with special needs or disabilities. (20 CFR 641.302(i))**

- Coordination with the nine regional Tennessee Area Agencies on Aging organizations that provide curb-to-curb transportation for older Americans (60 and older) is vital in the rural areas to provide access to individuals to participate in SCSEP.
- Partnerships with various community and faith based organizations that provide food to older Americans to ensure SCSEP participants have access to proper nutrition such as Second Harvest Food banks, Senior Centers for congregate meals, and local Help Centers is ongoing. Additionally, SCSEP and SNAP E&T programs are working together to ensure participants if wanted the option to sign up for nutrition benefits, and leverage training opportunities to better equip SCSEP participants for the job market

- Coordination with community and faith based organizations that serve older Americans such as Senior Centers, Meals-on-Wheels nutrition sites, and senior transportation, serve as host agencies across the state.
- Coordination with programs that serve individuals with special needs or disabilities such as Vocational Rehabilitation and employers such as Goodwill Industries to ensure a successful outcome with SCSEP.
- Participants' training positions include greeters and resource assistants, administrative assistants, file/records clerks, custodians, office assistants, job developers, case managers, and computer assistants.
- Negotiate for participant staff to be co-located at American Job Center offices where feasible. If participant assistants are trained as job developers or job developer assistants, they will be able to assist American Job Centers, older job seeker customers to find employment and enable AJC staff to address other customers or service delivery needs.
- Participate in meetings, as appropriate, with senior service providers, both public and private.
- Continue to utilize computer, adult basic education (ABE), continuing education, and other targeted training courses at community colleges, taking advantage of course discounts for individuals 55 to 64 years of age and free classes for individuals 65 years of age and older at community colleges. Libraries and community-based organizations also offer ABE, and ESL classes.
- Work with LWDA Boards to encourage community colleges to create short-term education and training programs that are relevant for local targeted industries and high- priority occupations.

#### **D. Planned actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))**

The SCSEP and SNAP E&T programs collaborated and have created a Memo (<https://www.tn.gov/content/dam/tn/workforce/documents/wfs/SCSEPSNAPMemo.pdf>) mandating the two programs leverage funds from the other, where possible, to provide extra training services that otherwise would not be possible. Additionally, SCSEP sub-grantees actively seek job training opportunities leading to jobs available and offered by Community Colleges, Applied Colleges of Technology, non-profit organizations, such as Goodwill Industries, Adult Education programs and other training institutions. SCSEP is and will continue to be an active member of the local business service teams.

#### **E. Actions to ensure that SCSEP is an active partner in the one-stop delivery system and the steps the State will take to encourage and improve coordination with the one-stop delivery system. (20 CFR 641.335)**

The partnership with SCSEP and the American Job Center system is essential to the success of SCSEP in Tennessee. A Memorandum of Understanding (MOU) is developed to coordinate activities between SCSEP and the Workforce delivery system. The state will encourage One-Stop American Job Centers to hold regular partner meetings that include all SCSEP grantees operating in each local area to improve coordination with the Workforce delivery system. Sub-grantee strategies include, but not limited to:

- Co-enrollment into WIOA where possible
- Participating in American Job Center (AJC) partnerships meetings
- Referring participants eligible for SCSEP services to supportive services
- Using AJC's in local areas, where feasible as a host agency

## F. Efforts to work with local economic development offices in rural locations.

Grantees or local projects will collaborate with the local Workforce System and economic development councils in both urban and rural areas in order to provide education on the exceptional qualities that older adults bring to the workplace, to learn about potential employment growth opportunities, to discuss where older workers could add value to growth areas, and to increase job opportunities. SCSEP priority of service requires outreach to rural communities.

Local project staff utilizes their connections with AJC's Veteran Representatives and Vocational Rehabilitation to promote SCSEP and learn about individuals who may meet the priority of service and eligibility requirements. Grantees will continue to engage organizations that serve hard to reach populations, such as those who are geographically or socially isolated and those whose primary language is not English.

## 2. The State's long-term strategy for engaging employers to develop and promote opportunities for the placement of SCSEP participants in unsubsidized employment. (20 CFR 641.302(e)) (May alternatively be discussed in the State strategies section of strategic plan.)

The State's long term strategy to engage those employers in rural areas is one that is always evolving. Currently, we are discussing out of the box opportunities for participants at host agencies: such as Bee Keeping and Agriculture. However, what has worked in the past is still relevant and currently working. These strategies include by aren't limited to:

- Establish partnerships with local Chambers of Commerce and employer organizations
- Encourage Tennessee grantees to continue relationships with their local, county and state economic development councils.
- Continuing training for sub-grantees on topic including data validation, reaching rural population, most-in-need, etc.
- Encouraging sub-grantees to hold meeting for Host agencies educating them on the value of hiring older workers.

## 3. The State's long-term strategy for serving minority older individuals under SCSEP. (20 CFR 641.302 (c))

1. Monitoring of minority participations to assure performance negotiated goals are met

2. Reaching out to community and faith-based organizations that serve minority populations to recruit eligible individuals
3. Seeking eligible minorities by outreach efforts with Workforce System partners such as Vocational Rehabilitation and Social Service agencies
4. Using multi-lingual brochures and fliers to reach non-English speaking minority groups
5. For Hispanic and Asian population
  - a. Determining the cause(s) for the minority group's lower enrollment
  - b. Setting specific targets for the number of minority enrollees expected.
  - c. Identifying the steps to increase the enrollment of each minority group
  - d. Beginning monitoring minority enrollments on a quarterly basis
  - e. Prioritizing bilingual service delivery whenever possible to encourage full participation
  - f. Collaborating with Migrant and Seasonal Farmworker programs for those individuals that are over 55 and above

**4. A list of community services that are needed and the places where these services are most needed. Specifically, the plan must address the needs and location of those individuals most in need of community services and the groups working to meet their needs. (20 CFR 641.330)**

1. Monitoring of minority participations to assure performance negotiated goals are met
2. Reaching out to community and faith-based organizations that serve minority populations to recruit eligible individuals
3. Seeking eligible minorities by outreach efforts with Workforce System partners such as Vocational Rehabilitation and Social Service agencies
4. Using multi-lingual brochures and fliers to reach non-English speaking minority groups
5. For Hispanic and Asian population
  - a. Determining the cause(s) for the minority group's lower enrollment
  - b. Setting specific targets for the number of minority enrollees expected.
  - c. Identifying the steps to increase the enrollment of each minority group
  - d. Beginning monitoring minority enrollments on a quarterly basis
  - e. Prioritizing bilingual service delivery whenever possible to encourage full participation
  - f. Collaborating with Migrant and Seasonal Farmworker programs for those individuals that are over 55 and above

5. The State's long-term strategy to improve SCSEP services, including planned long-term changes to the design of the program within the State, and planned changes in the use of SCSEP grantees and program operators to better achieve the goals of the program. This may include recommendations to the Department as appropriate. (20 CFR 641.302(k))

The State long term strategy will continue to be: Working with new and existing host agencies in an effort to improve and increase in-demand training opportunities. Increase partnerships with community colleges in the development of programs to meet the needs of participants. Increase opportunities to meet participant's needs through supportive services. Increase awareness of the SCSEP to unsubsidized employers in an effort to promote employment opportunities for participants. Expand economic opportunities through utilizing On the Job Experience (OJE) for participants.

6. The State's strategy for continuous improvement in the level of performance for SCSEP participants' entry into unsubsidized employment, and to achieve, at a minimum, the levels specified in OAA Section 513(a)(2)(E)(ii). (20 CFR 641.302(f))

- Grantees will provide well-established partnerships with local Chambers of Commerce and employer organizations.
- Encouraging Tennessee grantees to establish relationships with their local, county and state economic development councils and accessing their press releases of future or growing business announcements.
- Provision of tools on each grantee's Web site for sub-grantees and older worker jobseekers. Tools may include resources and supportive services targeted for older Americans, resume help (tips, templates), information on starting a business, interviewing aids, job-search strategies for older workers (highlighting employers who hire older workers), etc.
- Continuous training of sub-grantees, with topics including: performance measures, data validation, budget management, Most-In-Need barriers, job search strategies, etc.
- Encouragement of AJCs to hold job fairs targeted for older workers during Hire Older Worker Week in September.
- Encouragement of SCSEP sub-grantees to reach out to employers to educate them on the value of hiring older workers.
- Encouraging the use of sector strategies to assist lower-skilled workers with skill attainment and job placement.
- Encouraging further education, such as HSE, higher education, and technical training.
- Encouraging SCSEP sub-grantees to form local employer advisory boards.
- Promoting OJE as a tool for sub-grantees to use in future program years to gain more unsubsidized jobs for participant job seekers

## c. Location and Population Served, including Equitable Distribution

### 1. A description of the localities and populations for which projects of the type authorized by title V are most needed. (20 CFR 641.325 (d))

- Coordination with the nine regional Tennessee Area Agencies on Aging organizations that provide curb-to-curb transportation for older Americans (60 and older) is vital in the rural areas to provide access to individuals to participate in SCSEP.
- Partnerships with various community and faith based organizations that provide food to older Americans to ensure SCSEP participants have access to proper nutrition such as Second Harvest Food banks, Senior Centers for congregate meals and local Help Centers is ongoing.
- Coordination with community and faith based organizations that serve older Americans such as Senior Centers, Meals-on-Wheels nutrition sites, and senior transportation, serve as host agencies across the state.
- Coordination with programs that serve individuals with special needs or disabilities such as Vocational Rehabilitation and employers such as Goodwill Industries to ensure a successful outcome with SCSEP.
- Use Tennessee's directories of service and support organizations to identify entities and programs in the community that provide referrals and support services to seniors.
- Negotiate community service assignments for participants at AJC offices where feasible. Participants' training positions include greeters and resource assistants, administrative assistants, file/records clerks, custodians, office assistants, job developers, case managers and computer assistants.
- Negotiate for participant staff to be co-located at AJC offices where feasible. If participant assistants are trained as job developers or job developer assistants, they will be able to assist American Job Centers' older job seeker customers to find employment and enable Workforce System staff to address other customers or service delivery needs. Participate in meetings, as appropriate, with senior service providers, both public and private.
- Provide information and referrals to the services of AJC Offices and SCSEP, respectively.
- Continue to utilize computer, adult basic education (ABE), HSE, continuing education, and other targeted training courses at community colleges, taking advantage of course discounts for individuals 55 to 64 years of age and free classes for individuals 65 years of age and older at community colleges. Libraries and community-based organizations also offer ABE, HSE, and ESL classes.
- Work with local boards to encourage community colleges to create short-term education and training programs that are relevant for local targeted industries and high-priority occupations.
- List participant openings and staff openings on Jobs4TN
- Assist job-ready participants to register on Jobs4TN

- Include AJC job seeker workshops and Job Clubs, when feasible, in Individual Employment Plans for participants who live near or have their host agency assignment near an AJC office.
- Attend local board meetings when feasible.
- Provide updates to local boards on SCSEP activities and successes in the LWDA.

## 2. List the cities and counties where the project will be conducted. Include the number of SCSEP authorized positions and indicate where the positions changed from the prior year.

The State is currently allocated 167 authorized positions that cover the following Tennessee Local Workforce Developments Areas (LWDA's) and their counties:

- Northeast Tennessee: Carter, Johnson, Sullivan and Washington
- East Tennessee: Scott, Campbell, Claiborne, Union, Scott and Morgan
- Upper Cumberland: Macon, Jackson, Fentress, Putnam, Cumberland and VanBuren
- Southwest Tennessee: Hardeman, Chester, McNairy, Hardin
- Northwest Tennessee: Dyer, Obion, Weakley, Henry, Stewart, Montgomery, Houston,
- Cheatham and Humphreys
- Greater Memphis: Shelby

## 3. Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

The State does not see any slot imbalances in equitable distribution of services.

## 4. The State's long-term strategy for achieving an equitable distribution of SCSEP positions within the State that:

### A. Moves positions from over-served to underserved locations within the State in compliance with 20 CFR 641.365.

The 2016 Census Report and Total Employment U.S. Bureau and Labor Statistics report showed that the Tennessee counties that were greatest in need were: Lake, Crockett, Stewart, Houston, Perry, Trousdale, Moore, VanBuren, Bledsoe, Meigs, Polk, Hancock, Union and Morgan. These counties are considered rural with the lowest employments rates. This allocation and other allocations are based on data from the U.S. Census Bureau and data from the Bureau of Labor and Statistics.

### B. Equitably serves rural and urban areas.

Rural areas that have inadequate resources will have access to the WIOA services. Rural-area employers with SCSEP training include: custodial, food service, lawn care, department store greeters, librarian assistants, and childcare providers. In order to develop the types of jobs listed above, sub-grantees will make connections with businesses, local employers, schools, childcare facilities, nursing

homes, and healthcare facilities. Like the rural population, Tennessee's urban population has its shares of challenges, which includes low skills, background, health, access, transportation and other barriers to employment. The realization is that the individual may no longer be physically fit or because of technological advancements possess the knowledge or skills to use advanced machinery and/or equipment. For this reason, many of SCSEP participants' lack relevant skill set(s) for other industries including high growth industries for which they have not worked or have received training. Another consequence that stems from the age old tradition of maintaining loyalty to one company or job is the lack of education required for that job.

### **C. Serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)**

Many participants are given priority status under the SCSEP program. SCSEP sub-grantees work to enroll older workers using this priority of service: first, individuals who are veterans and their qualified spouses; next, individuals, who are 65 and older, or:

- Have a disability
- Have limited English proficiency or low literacy skills
- Reside in a rural area
- Have low employment prospects
- Have failed to find employment after using services under Title I of WIA
- Are homeless or at risk of homelessness

Outreach to local organizations, serving individuals with barriers (such as veterans and the homeless), will be used to recruit individuals 55 years old or older meeting SCSEP guidelines.

## **5. The ratio of eligible individuals in each service area to the total eligible population in the State. (20 CFR 641.325(a))**

The greatest economic need is for those at or below 125% of the Department of Health and Human Services Poverty Level. In Tennessee, according to 2018 Census Data, 1,110,281 people account for the age group 55+; TDLWD estimates that 182,086 are eligible for SCSEP services. To be eligible for SCSEP, an individual must be 55 years old or older, have a total family income of less than 125 percent of the Federal poverty level and be unemployed. The greatest social need is defined by USDOL as a need caused by noneconomic factors. This includes persons with physical disabilities and mental disabilities, language barriers, and cultural, social, or geographic isolation brought about by racial or ethnic status.

The Most-In-Need outreach includes services from WIOA, community outreach, assistance in providing transportation, workforce system referrals, promoting area businesses in an effort to increase host agency assignments. Sub-grantees are encouraged to participate in the local board that includes members of the community, business owners, representatives, and those from other state agencies. The sub-grantee is assigned to the American Job Center for at least four hours week to recruit participants qualified to participate in the program. The state's objective to improve these resources is an ongoing effort.

Overall, recruitment endeavors in Tennessee have been successful in reaching and serving the SCSEP-targeted special populations. The use of Disability Program Navigators throughout the

Career Center system is a great resource. Navigators assist individuals, with special needs, with Career Center staff in the recruitment and selection process. Navigators bridge the gap between the business and human service communities by organizing forums for discussion, etc.

## 6. The relative distribution of eligible individuals who:

### A. Reside in urban and rural areas within the State

Addressed in question 10

### B. Have the greatest economic need

Addressed in question 10

### C. Are minorities

Addressed in question 10

### D. Are Limited English Proficient

Addressed in question 10

### E. Have the greatest social need. (20 CFR 641.325(b))

Addressed in question 10

## 7. A description of the steps taken to avoid disruptions to the greatest extent possible, when positions are redistributed, as provided in 20 CFR 641.365; when new Census or other reliable data become available; or when there is over-enrollment for any other reason. (20 CFR 641.325(i), 641.302(b))

When a new census or other reliable data becomes available or when there is over-enrollment for any other reason, every effort is made to ensure that there is no disruption in service by ceasing new enrollments until authorized levels are met. Individual Employment Plans are reviewed and any remaining barriers to employment are addressed; also an aggressive job placement strategy is put in place to achieve authorized levels.

In the case of any transition of positions, whether caused by a shifting in census data and the location of SCSEP positions or sub-grantees moving within the state, the grantee designated point of contact will serve as the team leader whose responsibilities will include: serving as a coordination point of contact for participants, host agencies, other grantees, state SCSEP Offices and USDOL. The Federal Project Officer will be consulted and will subsequently approve any movements of positions. No movement or transfer of positions will be initiated until the State Agency is notified. After approval, the file transfer process begins.

# Community Services Block Grant (CSBG)

Note: Below is information about the employment and training activities carried out under the Community Services Block Grant (CSBG) (42 U.S.C. 9901 et seq.) that is included in the WIOA Combined State Plan. The complete CSBG State Plan is submitted directly to the Federal agency that administers that program and is collected under OMB Control Number: 0970-0382.

Where CSBG is included in the Combined State Plan, the State CSBG Lead Agency (as designated by the chief executive of the State under the requirements of section 676(a) of the CSBG Act (42 U.S.C. 9908(a)) will coordinate plans for employment and training activities under CSBG as part of a larger antipoverty and workforce development strategy.

As part of the Combined State Plan, the State CSBG Lead Agency must:

(a) Describe how the State and the eligible entities will coordinate the provision of employment and training activities through Statewide and local WIOA workforce development systems; and may

(b) Provide examples of innovative employment and training programs and activities conducted by eligible entities or other neighborhood-based organizations as part of a community antipoverty strategy.

(a) Describe how the State and the eligible entities will coordinate the provision of employment and training activities through Statewide and local WIOA workforce development systems

The Tennessee Department of Human Services (TDHS) Community Services Block Grant (CSBG) program has established active partnerships to facilitate and encourage coordination between the twenty Community Action Agencies (CAAs) participating in the State's CSBG program and statewide and local workforce development systems.

Each CAA executes an annual grant contract with TDHS, which requires the agency to "engage with community partners and align services with priority State initiatives" including "Education and employment initiatives in alignment with the Workforce Innovation Opportunity Act (WIOA) State Plan that support early literacy, school, readiness, after school programs, and the Drive to 55".

Several CAAs have executed memoranda of understanding with local workforce development agencies to foster greater workforce development coordination. Additional CAA practices supported by the State are co-locating the CAA with a workforce agency to provide stronger collaboration and maintaining the practice of dual case management with workforce agencies to monitor customer needs and goals across a variety of categories.

The usual role of a CAA in workforce development is to provide supplemental services that assist employment goals. Whereas a workforce agency provides assessment and job training, CAAs provide funding for job-related clothes and tools, and transportation to interviews or to a place of employment. Additionally, and explained in greater depth below, several agencies have developed innovative programs using CSBG funding for specific, regional employment initiatives.

Moving forward, TDHS sees room for growth in improving CAAs' intake processes to better identify employment needs and make targeted referrals to workforce agencies, and growing relationships with workforce agencies to provide supplemental services that can help customers obtain and maintain employment.

(b) Provide examples of innovative employment and training programs and activities conducted by eligible entities or other neighborhood-based organizations as part of a community antipoverty strategy

MAC offers an entry level information technology credential, CompTIA A+ Certification, for adults interested in a career in IT. The certification includes an internship placement with local tech companies. Also, adults interested in early childhood education are able to enroll in the Child Development Associate (CDA) program. While enrolled in CDA classes, students are allowed to work part-time within the agency's Head Start early childhood education program as they pursue their certificate. Upon completion, students are offered full-time teaching positions by the agency.

The Self-sufficiency Training and Results (STAR) program is a partner referral program with the TDHS Workforce Board. The STAR program provides case management, education, child care, budgeting, soft skills training, employment training, and daily living expenses. Recently, twenty-five participants have become employed and twenty have received certification/degrees in areas that include nursing and information Technology.

Creative Cuisine is a culinary arts education program that gives participants the skills and confidence to pursue a successful career in the culinary industry. In this fourteen-week program, students learn culinary skills, financial management, and career development from highly-qualified staff. Graduates leave the program with over forty hours of hands-on training from a head chef and an applied knowledge of culinary industry standards. Graduates also receive training in soft skills (preparation for the workforce) and customer service in this setting. This culinary training program is available to the parents of Head Start children, as well as income eligible clients.

There were three graduates from the inaugural class. Two started their own business, and one gained employment. There will be three graduates from the second class. Two of them have obtained employment and one is seeking employment. There are twelve students enrolled in the third class which began October 31, 2019.

## Performance Indicator Appendix

### All WIOA Core Programs

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

All WIOA Core Programs

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> "Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

## Additional Indicators of Performance

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Additional Indicators of Performance
N/A

## Other Appendices

N/A