TENNESSEE PYS 2024-2027

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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.)) [1]

[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.[2] States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations. Use of links to external websites and documents is permitted within the State Plan narrative submission, if such links remain active and adhere to Section 508 accessibility requirements.

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.

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 the following key elements:

1. Improving services to new and existing businesses for the enhancement and expansion of operations and talent recruitment and retention

2. Improving skills and credential attainment by expanding vocation education and workforce development programs;

3. Supporting regional and rural economic development strategies;

4. Enhancing services and opportunities for justice-involved citizens; and

5. 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. I. WIOA State Plan Type & Strategic Summary – DRAFT 3 This alignment 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 WIOA plan serves as a necessary opportunity to evaluate all aspects of our workforce system to chart a promising path towards 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. Where requirements identify the term "populations", these must include individuals with barriers to employment as defined

at WIOA Section 3. This includes 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. Additional populations include veterans, unemployed workers, and youth, and others that the State may identify.

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

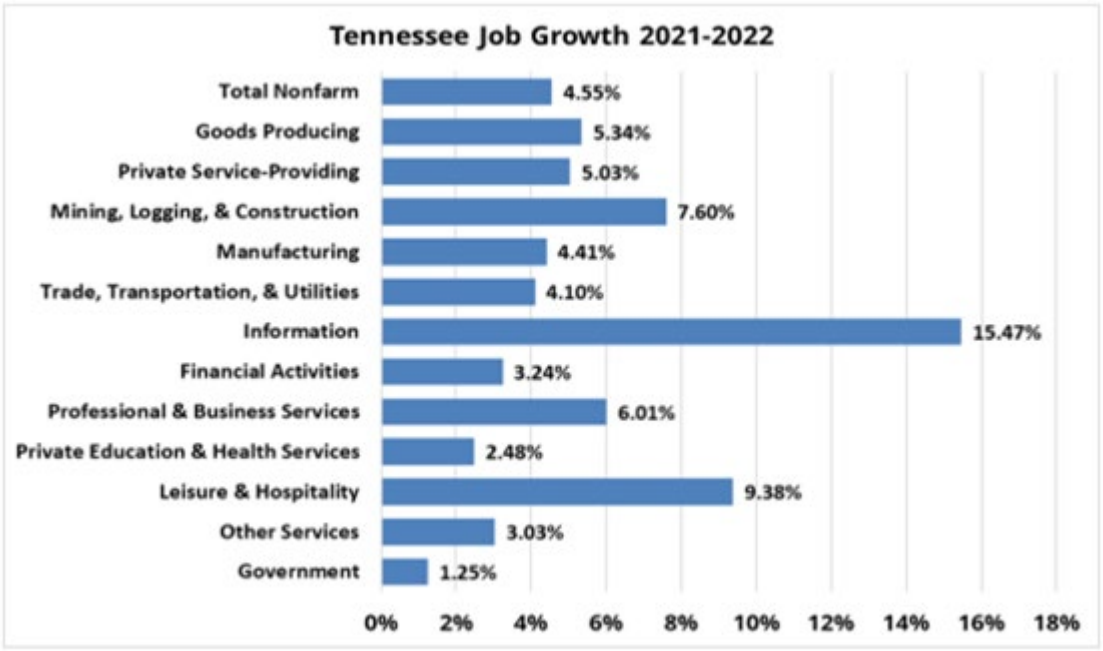
With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

The Tennessee Economy in 2022: Nonfarm employment in Tennessee (by place of residence) increased by 1.7 percent from 2021 to 2022, adding 53,296 jobs over the year (see summary, p. 3). Metropolitan growth (by place of employment) was positive for all major metropolitan areas with Memphis, Nashville, Knoxville, and Chattanooga all gaining employment by three percent or more. The Nashville MSA showed the greatest increase in employment. Employment increased in 89 of the 95 counties. The number of establishments grew by 10.1 percent and nominal total payroll increased by 9.9 percent to 196.1 billion dollars. The average annual median wage (not adjusted for inflation) also increased by 5.9 percent to $39,929. The average hourly wage for production workers was $20.38.

In June 2022 the TDLWD job bank, jobs4tn.gov, listed an average of 0.48 unemployed workers for each job opening, making it more difficult for employers to find workers in the economy.

Although the unemployment rate for veterans was below the state average, rates for youth and those with disabilities, as well as the poverty rate, were still in the double digits. There was a significant increase in the unemployment rate of those under the poverty level.

Statewide Industry Employment 2022: By place of employment, manufacturing jobs increased by 4.41 percent, nearly as rapidly as employment in the private service-providing sector. In services, the information and arts and entertainment industries showed the largest growth rates in the state, at 15.5% and 9.4% respectively. Other industries that experienced significant growth rates over the past year were accommodation and food services; mining, logging, and construction; and professional and business services (Fig. 1).



Source: TDLWD, WIR²ED Division, Current Employment Statistics

Figure 1

Manufacturing, retail trade, and healthcare and social assistance remained the largest sectors in total employment in 2022 (Table 1), followed by accommodation and food services, local government (including education), and administrative support, waste management, and remediation services. Over the five-year period from 2017 to 2022, the industry sectors adding the most jobs were mining, logging, and construction; transportation, warehousing, and utilities; and professional, scientific, and technical services.

Other sectors adding 10,000 or more jobs over the last five years were administrative support, waste management, and remediation (12,600); health care and social assistance (12,300); other services (11,300); and durable goods manufacturing (10,300) (Table 1).

Table 1. Tennessee Industry Employment, 2017-2022

Industry Employment (in thousands)	2017	2021	2022	2021-2022		2017-2022	
Total Nonfarm	3,016.4	3,103.5	3,244.8	141.3	4.6%	228.4	7.6%
Goods Producing	471.4	490.2	516.4	26.2	5.3%	45.0	9.5%
Mining, Logging, & Construction	124.6	140.7	151.4	10.7	7.6%	26.8	21.5%
Manufacturing	346.8	349.5	364.9	15.4	4.4%	18.1	5.2%
Durable Goods Manuf.	222.2	221.5	232.5	11.0	5.0%	10.3	4.6%
Non Durable Goods Manufacturing	124.6	128.0	132.4	4.4	3.4%	7.8	6.3%
Private Service-Providing	2,114.7	2,181.8	2,291.6	109.8	5.0%	176.9	8.4%
Trade, Transportation, & Utilities	616.4	650.6	677.3	26.7	4.1%	60.9	9.9%
Wholesale Trade	119.3	121.3	129.5	8.2	6.8%	10.2	8.5%
Retail Trade	332.9	331.3	341.0	9.7	2.9%	8.1	2.4%
Transportation, Warehousing, & Utilities	164.2	197.9	206.8	8.9	4.5%	42.6	25.9%
Information	46.3	47.2	54.5	7.3	15.5%	8.2	17.7%
Financial Activities	162.7	169.7	175.2	5.5	3.2%	12.5	7.7%
Finance & Insurance	123.0	128.9	132.4	3.5	2.7%	9.4	7.6%
Real Estate, Rental & Leasing	39.8	40.7	42.8	2.1	5.2%	3.0	7.5%
Professional & Business Services	410.7	437.8	464.1	26.3	6.0%	53.4	13.0%
Professional, Scientific & Technical Services	137.8	158.3	170.7	12.4	7.8%	32.9	23.9%
Management of Companies & Enterprises	46.1	51.8	54.1	2.3	4.4%	8.0	17.4%
Admin, Support, Waste Mgt & Remediation Services	226.8	227.6	239.4	11.8	5.2%	12.6	5.6%
Private Education & Health Services	435.0	439.9	450.8	10.9	2.5%	15.8	3.6%
Private Educational Services	60.1	61.6	63.6	2.0	3.2%	3.5	5.8%
Health Care & Social Assistance	374.9	378.3	387.2	8.9	2.4%	12.3	3.3%
Leisure & Hospitality	329.2	314.5	344.0	29.5	9.4%	14.8	4.5%
Arts, Entertainment & Recreation	37.8	37.4	43.3	5.9	15.8%	5.5	14.6%
Accommodation & Food Services	291.4	277.2	300.7	23.5	8.5%	9.3	3.2%
Other Services	114.5	122.1	125.8	3.7	3.0%	11.3	9.9%
Government	430.4	431.5	436.9	5.4	1.3%	6.5	1.5%
Federal Government	49.1	51.6	52.4	0.8	1.6%	3.3	6.7%
State Government	98.0	94.6	94.3	-0.3	-0.3%	-3.7	-3.8%
Local Government	283.3	285.3	290.2	4.9	1.7%	6.9	2.4%

Source: TDLWD, WIR³ED Division, Current Employment Statistics

Table 1

Industry Projections to 2030

From a base of 3.2 million jobs in 2020, total employment for Tennessee, including agricultural, self-employed, and private household workers, is expected to grow to 3.7 million by 2030. Expected to increase by 0.9 percent annually, as it recovers from lower employment in the base year of 2020 due to the pandemic, Tennessee's economy in the long run is expected to continue expansion in eleven of twelve major industry sectors, with only retail trade expected to decline in employment from 2020 to 2030. The goods-producing industries are expected to expand by 1.25 percent annually and create an estimated 32,775 jobs over the 10- year period.

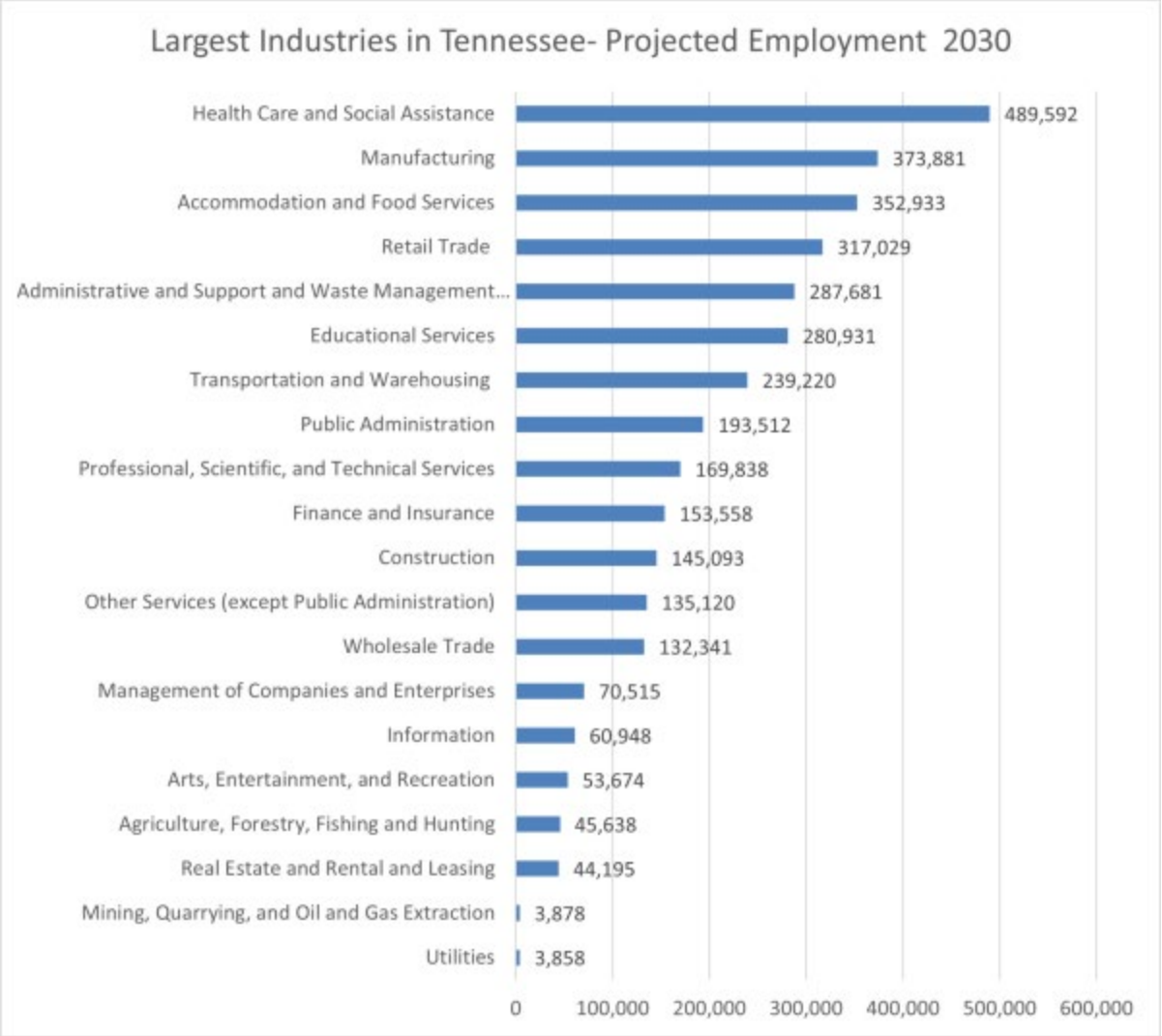


Figure 2

Tennessee's new efforts to manufacture electric vehicles and batteries, expand charging stations across the state, and other initiatives, are expected to propel the manufacturing industry to create nearly 40,000 jobs over the decade, and construction to create nearly 15,000. With the location of additional tech firms, the information industry could create nearly 19,000 jobs. Tennessee's largest industries by 2030 are expected to be health care and social assistance, manufacturing, accommodation and food services, and retail trade (Figure 2).

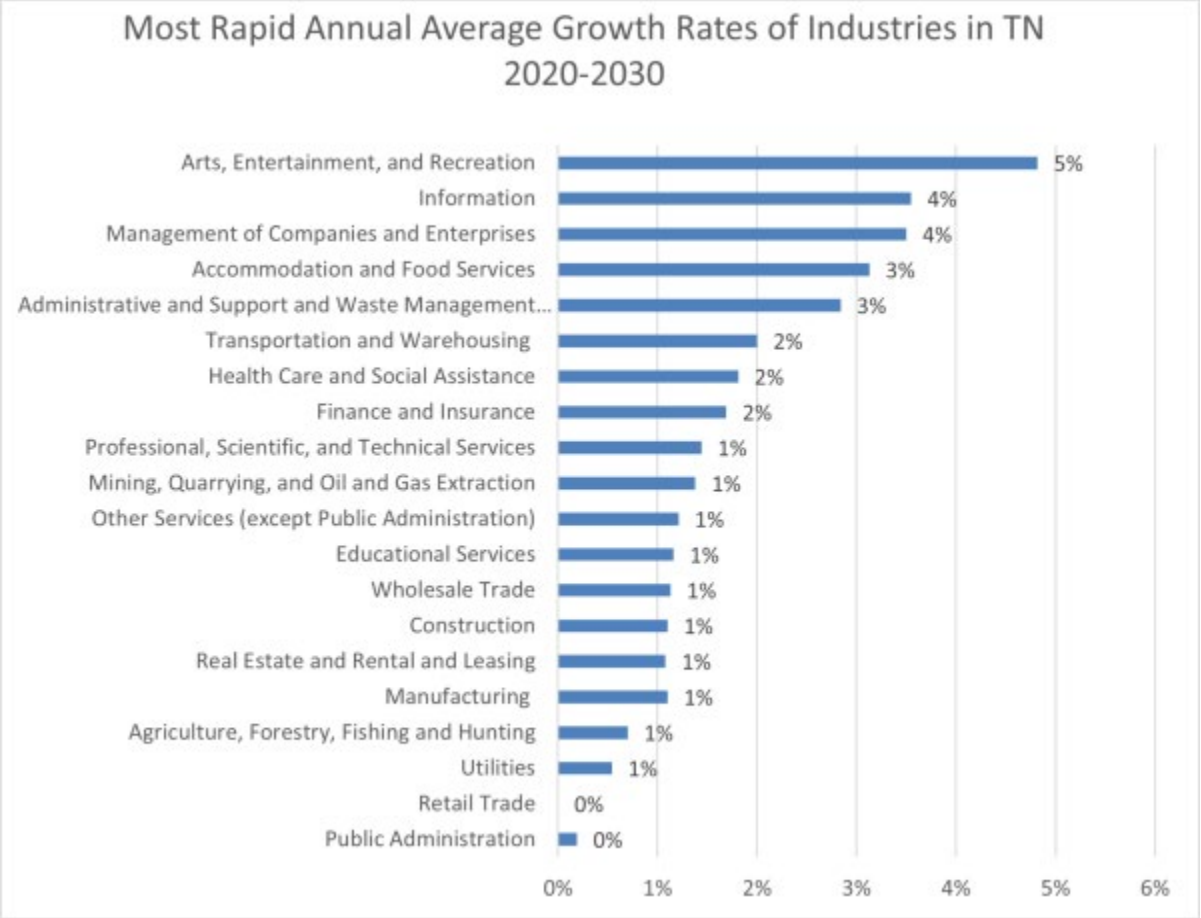


Figure 3

Starting from 2020 base year employment, arts, entertainment, and recreation is expected to be the fastest-growing industry, as it recovers from pandemic employment losses (Figure 3) . Due to recovery from 2020, accommodation and food services is projected to be the fourth most rapidly growing industry. Other rapidly growing sectors will include management of companies and enterprises and information, with tech companies planning to locate more employees in Tennessee. The services-providing sector is expected to expand at an annual growth rate of 1.7 percent. Other fast-growing services industries will include administrative and support and waste management and remediation and transportation and warehousing. Health care and social assistance will be one of the fastest-growing industries but is also expected to provide the second largest number of new jobs (80,570), over the ten-year period. Educational services will continue to grow at about one percent annually.

TN's Top Industries

In 2021-2022, based on place of work, Tennessee employment grew by nearly 4.6 percent, a notable recovery from the pandemic. Nonfarm employment in 2022 averaged 3,244,800 jobs, which was 141,300 more jobs than in 2021 (Table 1). All of Tennessee's 10 MSAs had positive employment growth from 2021 to 2022. The Nashville MSA had the largest increase- 69,900 jobs.

Notably, for the state, growth in the goods- producing sector of 5.3 percent outpaced that of the private service-providing sector (5.0) as in-sourcing of manufacturing increased with billions of

dollars in investment pouring into Tennessee. The growth in technology across many sectors contributed to the information industry being the most rapidly- growing sector in 2021-2022. Based on their historical growth, recent growth, employment size, projected growth, and for most, average weekly wages being above that of the state for 2022, seven industries were selected as top industries on which to focus employment services.

Spurring employment growth in the state are Tennessee's top industries, including:

- Leisure & hospitality- The industry "Art, Entertainment and Recreation" is first in terms of the number of jobs expected (60%) to be added by 2030 and the industry "Accommodation and Food Services" is placed fourth in terms of projected job growth (36%).
- Health care and social assistance- The largest industry in 2020 and projected to be the largest in 2030, it ranks second in the number of jobs expected to be added by 2030.
- Manufacturing- Ranked second in employment, and fifth in employment growth in 2021-2022, it also ranked fifth in the number of jobs expected to be added by 2030.
- Transportation, warehousing, and utilities- ranked first in the percent growth of new jobs from 2017-2022, it also ranked fourth in the number of new jobs expected to be added by 2030.
- Professional, scientific, and technical services- Ranked second in new jobs added in the five- year period, and one of the top five industries in growth in 2021-2022.
- Construction- It was in the top three industries for growth of new jobs in the last five years and in new jobs added from 2021-2022.
- Information- The industry grew at the most rapid pace of any in Tennessee from 2021-2022 at more than 15 percent in employment.

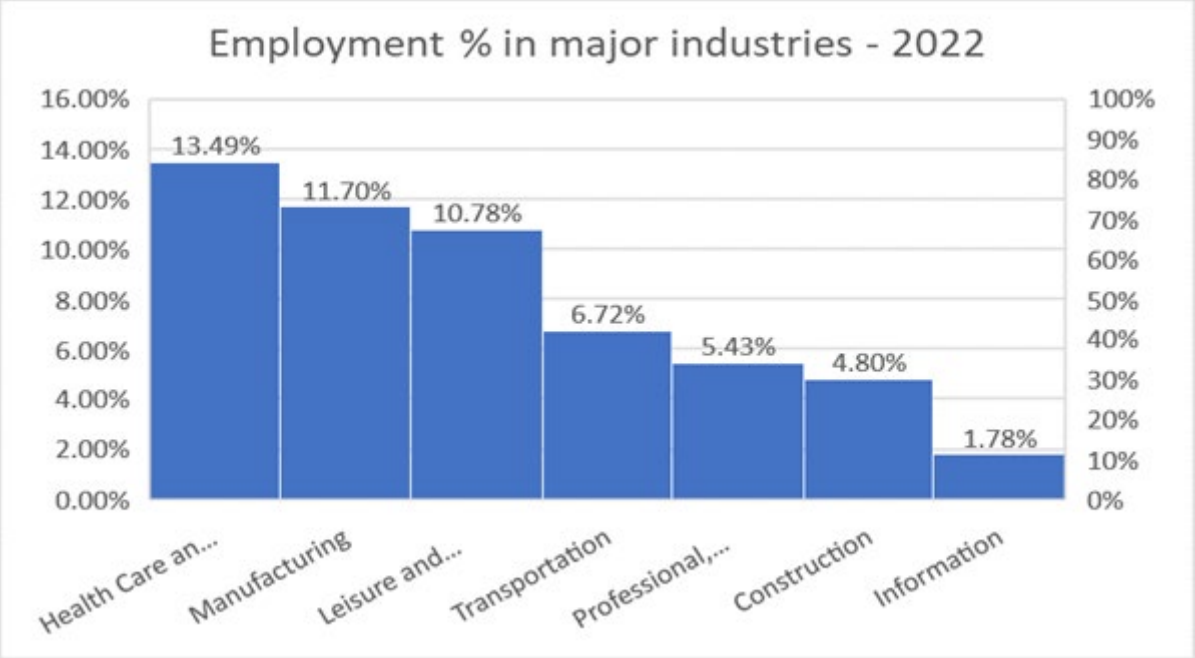


Figure 4

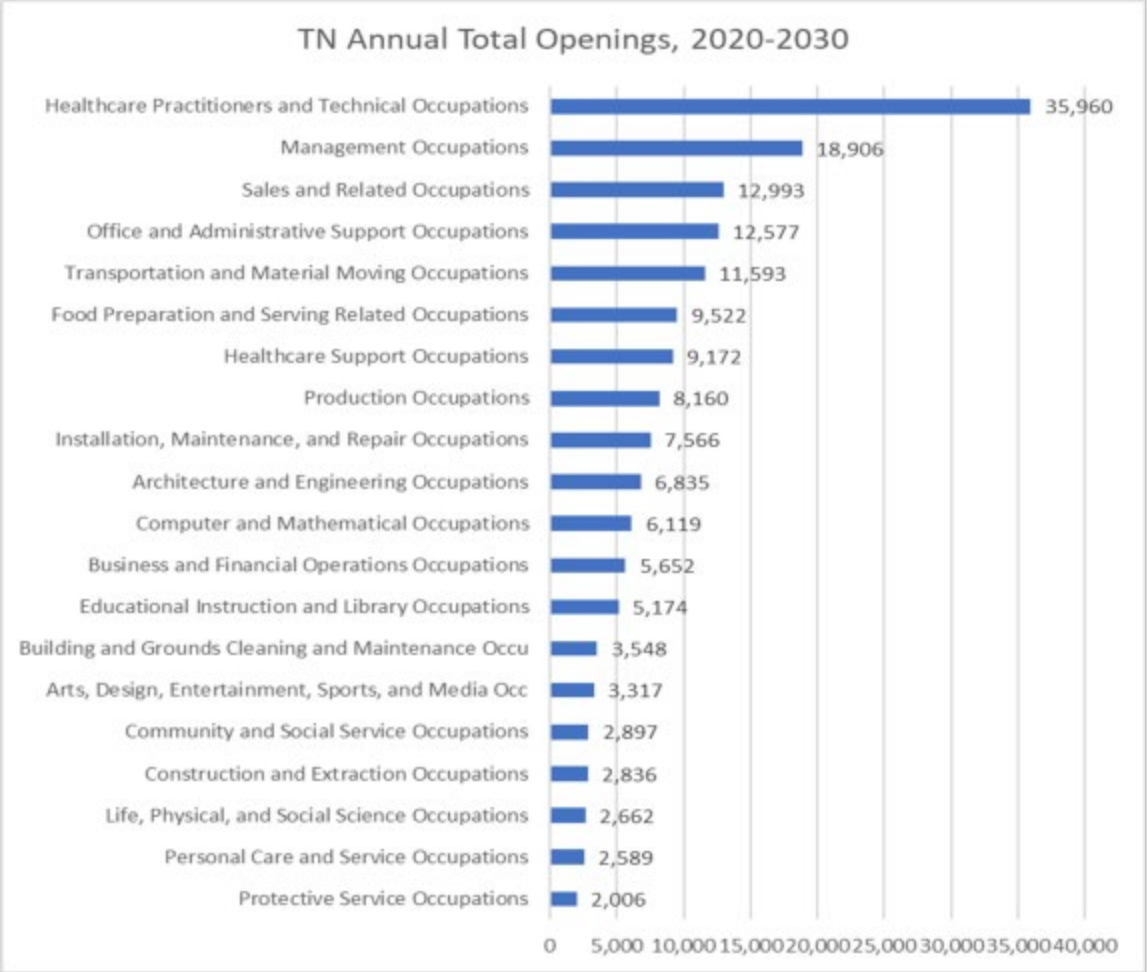
According to annual averages for 2022, these industries employ 54.7% of the total workforce. Health care and social assistance ranks first with a 13.5% market share, followed by manufacturing with an 11.7% market share and leisure and hospitality with a 10.78% market share.

Occupations in Demand - Occupational Projections

Almost 520,000 new jobs are expected to be created in Tennessee in the next ten years, although some are jobs returning after the pandemic. The largest number of new jobs by occupational group is for food preparation and serving related jobs, as many of these jobs are being restored after 2020; similarly, some of the office and administrative support and production jobs are returning after 2020 losses.

Other top new job-creating groups which did not suffer in the pandemic but will continue their growth include management and transportation and material moving. Healthcare practitioners and technical occupations are the fourth largest group, with healthcare support expected to create close to 37,000 jobs. Business and financial occupations also are forecast to expand. The top five occupational groups with the highest median salaries in 2020 included management, architecture and engineering, computer and mathematical, legal, and life, physical, and social science.

Job openings consist of new jobs as well as jobs created by workers transferring out of job classes or exiting the labor force altogether. For most occupational groups, the number of jobs created by transfers and exits far outweighs the number of new jobs. Top occupational groups expected to have the most job openings in 2020-2030 include: healthcare practitioners and technical, management, and sales occupations (Figure 5). The total number of occupational openings in the state of Tennessee by 2030 is projected to be more than 4.5 million.



Source: TN Department of Labor and Workforce Development, WIR²ED Division, Tennessee Long-Term Industry Projections 2020-2030.

Figure 5

Significant Occupational Shortages (SOS)

A continuing feature in today's economy is concern by employers in Tennessee about the shortage of workers to fill available jobs. Having enough employees allows employers to maintain productivity and expand as the economy grows. The Tennessee Department of Labor and Workforce Development's web site, jobs4tn.gov, in June 2023 listed 4.3 jobs for every unemployed person in the state. This is a nearly 80 percent increase over 2022. The three tables in this section compare the number of job openings listed in jobs4tn.gov for 2022 with the number of active resumes on the system for that year. Not all employers post jobs, nor do all individuals desiring jobs post resumes, but the data do provide a snapshot of areas which appear to have sizable labor force imbalances, and which need a greater supply of workers.

Table 5 shows the top 15 occupations in Tennessee by supply gap which require more than a high school diploma but less than a bachelor's degree. Nine of these are skilled occupations in healthcare, ranging from registered and licensed practical nurses to respiratory therapists. Most of these occupations require associate degrees. Significant shortages are also observed in the

following occupations: heavy tractor trailer drivers, bookkeepers and administrative support workers, and computer user support specialists. As more companies expand their operations so that their workers can work remotely, this is an occupation that is projected to be in need.

Table 5: Top Supply Gaps- Postsecondary through the Associate Degree

Supply Need	Education Level	Sum of Job Openings 2022	Sum of Resumes 2022	Openings Minus Resumes	Entry Level Annual Wage 2022
Registered Nurses	AA	93,116	625	92,491	54,486
Licensed Practical and Licensed Vocational Nurses	PS	19,558	296	19,262	36,873
Heavy and Tractor-Trailer Truck Drivers	PS	20,026	1,558	18,468	37,627
Nursing Assistants	PS	12,949	603	12,346	26,850
Surgical Technologists	PS	5,331	34	5,297	40,456
Bookkeeping, Accounting, and Auditing Clerks	SC	5,892	976	4,916	30,253
Medical Assistants	PS	5,031	811	4,220	28,974
Radiologic Technologists and Technicians	AA	3,863	51	3,812	42,802
Computer User Support Specialists	SC	4,208	513	3,695	36,615
Heating, Air Conditioning, and Refrigeration Mechanics and Installers	PS	3,777	192	3,585	35,517
Automotive Service Technicians and Mechanics	PS	3,348	352	2,996	31,045
Respiratory Therapists	AA	2,952	52	2,900	48,462
Phlebotomists	PS	2,929	184	2,745	29,229

Supply Need	Education Level	Sum of Job Openings 2022	Sum of Resumes 2022	Openings Minus Resumes	Entry Level Annual Wage 2022
Hairdressers, Hairstylists, and Cosmetologists	PS	2,621	391	2,230	20,559
Dental Assistants	PS	2,244	274	1,970	32,692

Key: AA Associate's degree; SC Some college; PS Postsecondary non-degree award

Sources: jobs4tn.gov job openings posted and active resumes 2022; OEWS 2022 entry level wages

Table 6 displays the top 15 occupations with labor supply shortages which usually require only a high school diploma or the equivalent and for which entry level wages are twenty percent above the 2022 median entry level wage in the state. Three of the occupations most in need of applicants are supervisors- of production; mechanics, installers, and repairers; and construction trades. Their wages are right on par with state median wages. Transportation occupations with shortages include transportation and distribution managers, commercial pilots, and transportation inspectors. Utility workers including electrical power line installers and repairers as well as power dispatchers are in high demand, as well as production employees like industrial machinery mechanics.

Occupation Title	Education Level	Sum of Job Openings 2022	Sum of Resumes 2022	Openings Minus Resumes	Entry Level Annual Wage 2022
First-Line Supervisors of Production and Operating Workers	HS	6,488	1,094	5,394	42,576
Postal Service Clerks	HS	3,228	159	3,069	46,508
Transportation, Storage, and Distribution Managers	HS	2,878	425	2,453	59,054
First-Line Supervisors of Mechanics, Installers, and Repairers	HS	2,211	232	1,979	44,257
First-Line Supervisors of Construction Trades	HS	843	355	488	44,789

Occupation Title	Education Level	Sum of Job Openings 2022	Sum of Resumes 2022	Openings Minus Resumes	Entry Level Annual Wage 2022
and Extraction Workers					
Industrial Machinery Mechanics	HS	525	105	420	42,307
Power Distributors and Dispatchers	HS	423	11	412	52,008
Claims Adjusters, Examiners, and Investigators	HS	569	221	348	44,488
Chemical Plant and System Operators	HS	358	53	305	49,106
Electrical Power-Line Installers and Repairers	HS	308	30	278	48,114
Commercial Pilots	HS	290	12	278	75,976
Brokerage Clerks	HS	224	24	200	46,082
Detectives and Criminal Investigators	HS	113	37	76	45,242
Precision Instrument and Equipment Repairers, All Other	HS	58	2	56	42,857

Key: HS High school

Sources: jobs4tn.gov 2022 annual online job openings; active resumes and unemployed persons with occupations 2022; OEWS 2022 entry level wages by occupation.

Table 7 lists the top 15 occupations with critical shortages of candidates which require a bachelor's degree. Management occupations are prominent, including general, marketing, sales, and financial, as well as their professional support staff in accounting and human resources. As the manufacturing industries in Tennessee including the production of electrical vehicles, batteries, medical supplies, and other products grow, the demand for engineers is also increasing. Computer analysts and computer systems programmers had more than 9,000 job openings listed with fewer than 250 applicants available. As technology companies continue to move into Tennessee, this is a trend that should continue, unless training is significantly increased.

Table 7: Top Supply Gaps: Bachelor's Degree Occupations

Occupation Title	Education Level	Sum of Job Openings 2022	Sum of Resumes 2022	Openings Minus Resumes	Entry Level Annual Wage 2022
General and Operations Managers	BA	11,369	1,466	9,903	57,596
Accountants and Auditors	BA	8,333	671	7,662	47,341
Computer Programmers	BA	4,879	74	4,805	73,015
Computer Systems Analysts	BA	4,343	175	4,168	59,031
Financial Managers	BA	4,314	357	3,957	82,470
Medical and Health Services Managers	BA	4,308	355	3,953	66,563
Human Resources Specialists	BA	4,284	803	3,481	38,070
Mechanical Engineers	BA	3,333	151	3,182	63,696
Management Analysts	BA	3,369	212	3,157	56,766
Sales Managers	BA	6,029	3,202	2,827	76,167
Industrial Engineers	BA	2,978	151	2,827	64,622
Civil Engineers	BA	2,561	43	2,518	63,044
Marketing Managers	BA	2,984	488	2,496	75,266
Electrical Engineers	BA	2,550	56	2,494	69,108
Producers and Directors	BA	2,533	220	2,313	34,885

Key: BA= Bachelor's degree. Source: TDLWD, WIRED Division, TN Occupational Projections 2020-2030; OEWS 2022; jobs4tn.gov job openings and active resumes 2022.

Assessing Teacher Vacancies

Most teachers apply for licenses with the Tennessee Department of Education and then apply for jobs through local school district web sites. These vacancies are not posted to a central web site for the state. Using available data, the largest supply gaps are for elementary, secondary,

and middle school teachers, excluding special education. Better data could lead to more success in recruiting students into these professions, at a time when teacher shortages continue to increase1 and education is a foundational public service. A regular inventory at the state level of numbers of teacher vacancies by subject matter is a necessary component for the healthy operation of our public schools. To begin to address these shortages, an apprentice program for teachers was begun and in 2022, 28 K-12 teachers completed the program.

Regional Industries and Occupations

West Region

- Most major indicators continued to increase (based on place of residence) in the West Region from 2021-2022. Nonfarm employment increased by 0.4 percent compared to the previous year's 2.8 percent, and lower than the state's 1.7 percent. By place of residence, nearly 3,000 jobs were created, about 5 percent of all new jobs in the state. More jobs, proportionately, are in the metro areas. By place of work, employment in the Memphis metropolitan area increased from 2021 to 2022 by 2.9 percent, and Jackson by 1.8 percent. In the West, total payroll increased by 4.4 percent compared to the state's 9.9 percent. Average wages for production workers increased to $19.92 and the labor force increased by 8,036. Youth unemployment increased from 15.8 percent to 17.1 and is still higher than the state rate of 12.5 percent.
- The three largest industries are health care and social assistance, transportation and warehousing, and manufacturing.
- Industries adding the most jobs from 2018 to 2022 included transportation and warehousing (over 8,500), health care and social assistance (6,400), and professional, scientific, and technical services (over 2,200).
- The population decreased by 3,886 from 2021-2022.
- Major economic investments in green energy will provide a boost to employment and skill gains in this region, with the Ford electric vehicle plant planning to provide 3,300 jobs, the SK On electric battery plant 2,500 jobs, and the Magna electric vehicle plant 1,300 jobs. Jobs most in demand in the region are listed in the Appendix to the Tennessee's Economy Report 2022-2023.

Figure 6

West TN Industries and Occupations (2018-2022)

Total employment in the West Region in 2022, was 679,312. The five largest industry sectors in 2022 were.

- Health care and social assistance (103,940 jobs)
- Transportation and warehousing (76,051)
- Manufacturing (73,546)
- Retail (71,675)
- Administrative and Support and Waste Management (59,883)

Compared to 2018, the industries adding the most workers include transportation and warehousing (over 8,500 new jobs), health care and social assistance (6,300 new jobs), and

construction (over 2,000 new jobs), Some of the region's largest industries lost jobs from 2018 to 2022, including retail trade (nearly 5,000), administrative and support (1,800), and finance and insurance (1,800). In 2021, employment in accommodation and food services was still 13 percent below its employment level in 2018. In 2022, the industry is still 8 percent below its pre-pandemic level, although it seems to be recovering slowly. All industry sectors saw an increase from their pre-pandemic earnings per worker. The largest increases in earnings per worker were in the real estate rental and leasing, other services, and administrative and support and waste management industries. These three industries have seen their earnings per worker increase 30 and 29 percent from the pre-pandemic earnings, respectively. The industries with the highest earnings per worker were management of companies and enterprises, finance, and insurance, and utilities.

West Region Occupational Employment

The transportation and material moving occupational group remains the largest in the West Region, according to the Occupational Employment and Wages Survey for 2022, which provides data on all industries except agriculture and the self-employed (Figure 7). Employment in this group in May 2022 was 105,090, adding more than 13,000 jobs since May 2015. Office and administrative support, sales, and production were next in total numbers of jobs. Over the seven- year period 2015-2022, the occupational groups adding the largest percentage of new jobs were the computer and mathematical, business and finance, and community and social service occupational groups.

Figures 7 and 8 display the largest occupational groups in the West Region and the occupational groups posting the most job openings in 2022.

Middle Region

- Most major indicators increased (based on place of residence) from 2021 to 2022, with the Middle Region leading the state with 2.9 percent in employment growth compared to the state's 1.7 percent. By place of residence, 41,000 jobs were created, more than 3 out of 4 new jobs in the state. By place of work, jobs in the major metropolitan area of Clarksville-Hopkinsville, TN-KY-MSA grew 4 percent, and in the Nashville MSA by 6.6 percent. In the region, total payroll increased by 8.8 billion. Average hourly wages for production workers topped $20.00 in 2022. The labor force increased by 29,787, supporting job expansion. Youth unemployment increased slightly from 2020 to 2021 to 9.89 percent, still lower than the state rate of 10.2 percent.
- The three largest industries are healthcare and social assistance, retail trade, and manufacturing, followed by accommodation and food services.
- The industries adding the most jobs included transportation and warehousing (20,657), construction (13,705), and professional, scientific, and technical services (13, 049).
- The population increased by an estimated 53,165 from 2021 to 2022, with more than 36,768 in the Northern Middle Region.

Middle Region Industries and Occupations

Total employment in the Middle Region in 2022, excluding self- employed and agricultural workers, was 1,461,565. The five largest industry sectors in 2022 were (Figure 9):

- Healthcare and social assistance (178,447)
- Retail Trade (135,359)

- Manufacturing (139,351)
- Accommodation and Food Services (131,314)
- Educational Services (96,674)

Compared to 2018, the industries adding the most new workers included the transportation and warehousing (20,657 new jobs), professional, scientific, and technical (13,049) and construction (13,705) industries. Only one industry, manufacturing, lost jobs from 2018 to 2022 (1,009). With this increase, accommodation and food services reported a growth of 3% since 2018, thus increasing its employment numbers post-pandemic. The most rapid growth was in the information, construction and transportation and warehousing sectors. The industries with the highest earnings per worker were the management of companies and enterprises, finance and insurance, professional, scientific, and technical, and information industries. The lowest earnings per employee were in the accommodation and food services industries.

The office and administrative support occupational group remained the largest in the Middle Region, according to the Occupational Employment and Wages Survey for 2022, which provides data on all industries except agriculture and the self-employed (Figure 10). Employment in this group in May 2022 was 184,660; however, it decreased employment by 3% since 2015. The next three largest industries were transportation and material moving, sales and related, and food preparation and serving. Sales and related jobs declined during the pandemic as e-commerce expanded. This group in 2022 has recovered and has employment at about the same level as in 2015.

East Region

- Most major indicators increased (based on place of residence) from 2021 to 2022, with East Region employment growing at nearly 1 percent compared to the state's 1.7 percent. By place of residence, nearly 10,000 jobs were created, nearly one of every five jobs created in the state. By place of work, jobs in the major metropolitan area of Knoxville grew by 4.6 percent and in the Chattanooga MSA, by 4 percent. In the region, total payroll increased by 4.9 billion. Average hourly wages for production workers topped $20.00 in 2022. The labor force increased by nearly 4,500 workers, , supporting modest job expansion. Youth unemployment was slightly lower from 2020 to 2021 at 10.6 percent.
- The three largest industries are manufacturing, healthcare and social assistance, and retail trade, followed by accommodation and food services.
- Industries adding the most jobs from 2018 to 2022 were manufacturing; professional, scientific, and technical services; and transportation and warehousing.
- The population in the region increased by 33,989 from 2021 to 2022; all LWDAs had increases.

East TN Industries and Occupations (2018-2022)

Total employment in the East Region in 2022, excluding self- employed and agricultural workers, was 1,097,671. The five largest industry sectors in 2022 were:

- Manufacturing (152,923)
- Health care and social assistance (137,802)

- Retail (126,134)
- Accommodation and food services (112,969)
- Educational services (78,214) (Figure 12)

Compared to 2018, the industries adding the most workers included the manufacturing (10,556), professional, scientific, and technical (7,641), and transportation and warehousing (5,203) industries. One of the largest industries, Healthcare and Social Assistance, has yet to regain its pre-pandemic level of employment. Despite showing negative growth from previously, accommodation and food services and educational services have reported growth in their industries surpassing 2018 levels. All except one industry sector increased its earnings per worker (total LWDA payroll divided by the average number of workers). The largest increases were in the accommodation and food services, administration and support, and real estate and rental and leasing. The industries with the highest earnings per worker were the management of companies and enterprises, utilities, and professional, scientific, and technical industries. The lowest earnings per worker were in the accommodations and food services industry.

The office and administrative support occupational group remains the largest in the East Region, according to the Occupational Employment and Wages Survey for 2022, which provides data on all industries except agriculture and the self-employed. Employment in this group in May 2022 was 142,0410; however, it decreased by 10% between 2015 and 2022. Transportation and material moving, production, and food preparation and serving were next largest in total numbers of jobs.

Occupational groups which added the most jobs from 2015 to 2022 included transportation and material moving, business and finance, construction and extraction, and production. Office and administrative support, sales and related, and personal care and service occupations lost the most jobs over the seven- year period. Other than management, the occupational groups with the highest median earnings included architecture and engineering, computer and mathematical, life, physical and social science, and legal occupations. These earnings results show the importance of STEM education and training in achieving higher earnings.

Occupational Demand by Region: The appendix to Tennessee's Economy 2022-2023 https://www.tn.gov/content/dam/tn/workforce/documents/majorpublications/reports-02/Part-5-Tennessee-Economy-2022-2023.pdf (p.80)

lists by East, Middle, and West Region occupations in demand alphabetically by job title. This list was developed by a collaboration of the Tennessee Departments of Labor and Workforce Development, Education, Economic and Community Development, and the Tennessee Higher Education Commission. The criteria for developing this list can be found in the related publication Improving the Pipeline for Tennessee's Workforce (March 2023) https://www.tn.gov/content/tn/thec/research/supply-and-demand.html.

A (ii) Emerging Demand Sector Industries and Occupations

Emerging Industries and Occupations: Within each of the major industries, emerging industries were identified- those expected to have the highest growth rates between now and 2030. In the information industry, software publishers are expected to have the highest growth. Within health care and social assistance, residential facilities for substance abuse, mental health, and intellectual disability have the greatest growth rate as funds for treatment are increasing; with an aging population, more assisted living facilities are being developed. Manufacturing is

forecast to have the highest growth in the electric vehicle and battery manufacturing industries. Some of the occupations expected to be in demand include electrical and electronics engineering technicians and technologists, electro-mechanical and mechatronics technicians and technologists, chemists, industrial and other engineers, and electricians, among others. In construction, nonresidential building structures include hotels, medical facilities, and manufacturing plants, among others.

From 2015 to 2023, investment and employment in electric vehicles, electric vehicle battery employment, and battery components have boomed in the U.S., with announced investments of $120.1 billion and 143,000 jobs. Tennessee, as one of the top 10 states, is the recipient of $16.6 billion in announced investments, expected to create 18,300 jobs. 2 These and other clean tech investments will create jobs for electricians, mechanics, construction workers, technicians, support staff, engineers, chemists, and related jobs.

Many grants being awarded are now specifying that plans for workforce development in emerging and traditional occupations be included in grant applications,3 with an emphasis on quality jobs and increasing equity in employment, encouraged by the U.S. Department of Labor. 4 In a recent national survey, four of five employers in energy technologies industries reported "some difficulty" in finding qualified workers.

Occupational Shortages: The Tennessee Hospital Association released a report in October 20225 stating that the changing demographics of the population in Tennessee will not only increase the demand for health care, but also make it more difficult to recruit and retain enough health care workers to meet the demand. While they project overall population growth will be 9.7 percent during that time, the population of 65- to-74-year-olds will increase by 13.3 percent and those 75 and older by 54.1 percent. They report current shortages include registered nurses, respiratory therapists, medical laboratory technologists and technicians, and emergency medical technicians. The number of social workers being trained is adequate, but low pay is creating problems with retention.

The significant occupational shortages section of this report lists occupations at every level-high school, postsecondary training from certificate to associate's degree, and bachelor's degree occupations for which large gaps exist between the number of job openings listed on jobs4tn and the number of resumes currently in the system. In addition, the media and school districts report many unfilled positions for elementary and secondary teachers for which accurate numbers are not available.

The appendix to Tennessee's Economy 2022-2023 lists by East, Middle, and West Region occupations in demand alphabetically by job title. This list was developed by a collaboration of the Tennessee Departments of Labor and Workforce Development, Education, Economic and Community Development, and the Tennessee Higher Education Commission. The criteria for developing this list can be found in the related publication Improving the Pipeline for Tennessee's Workforce (March 2023) https://www.tn.gov/content/tn/thec/research/supply-and-demand.html.

With Tennessee's growth comes the challenge of filling the current and emerging gaps in its workforce.

West Region

Major economic investments in green energy will provide a boost to employment and skill gains in this region, with the Ford electric vehicle plant planning to provide 3,300 jobs, the SK On

electric battery plant 2,500 jobs, and the Magna electric vehicle plant 1,300 jobs. Jobs most in demand in the region are listed in the Appendix.

Middle Region

Major economic investments: Major investments include green energy investments of lithium-ion battery manufacturing (Ultium LLC), 1300 jobs; medical products manufacturing by the Puritan and Life Technologies, 632 and 1400 jobs, respectively; warehouse distribution centers-Amazon (500 jobs) and Chewy (1,200 jobs), Oracle (software development) (8,500 jobs), and Southwest Airlines (1,300 jobs). Electric vehicle production is expanding, as are outpatient medical facilities. Jobs most in demand in the region are listed in the Appendix.

East Region

Major economic investments: Selected investments included continued expansion of the Volkswagen plant in the Chattanooga area as electric vehicle production was added; Smith and Wesson firearms manufacturing (750 jobs); and an Amazon distribution center (800 jobs). Jobs most in demand in the region are listed in the Appendix.

A (iii) **Employers' Employment Needs:** The TDLWD jobs4tn.gov web site tracks the top in-demand job certifications and tools and technologies from its advertised jobs database, updated every day. The tables below show the most requested certifications, including CPR, nursing credentials, and commercial driver license certifications for the three regions. For June 2023,among the most requested certifications included CPR and nursing certifications, commercial drivers' licenses, CPAs, EMT certifications, social work credentials, pharmacy technician certification, and medical assistants, the majority of which require medical knowledge and several patient care skills.

B. WORKFORCE ANALYSIS

The Unified or Combined State Plan must include an analysis of the current workforce in the State and within various state regions. Provide key analytical conclusions in aggregate as well as disaggregated among populations to identify potential disparities in employment and educational attainment and understand labor force conditions for items (i)-(iii) below. Populations analyzed must include individuals with barriers to employment described in the first paragraph of Section II. Analysis must include—

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.

Tennessee - Statewide

Employment and Unemployment

The U.S. unemployment rate declined from 5.9 percent in June 2021 to 3.6 percent in June 2023. The U.S. annual average rate for 2022 was 3.6 percent, down from 8.1 percent in 2012. Tennessee's annual average unemployment rate dropped from 8.0 percent in 2012 to 3.3 percent in 2023. However, labor force participation has also declined in Tennessee from 61.7 percent in 2012 to 59.4 percent in 2023. U.S. labor force participation also declined from 63.7 percent in 2012 to 62.6 percent in 2023.

West Region:

(i)Employment and Unemployment

Total employment in the West Region, excluding agriculture and the self-employed, increased from 676,654 to 679,312, an increase of 0.4 percent or 2,658 jobs. This rate of job growth was slower than the state. Employment rates however are trending upward in the Memphis MSA as well as the Jackson MSA.

The West Region consists of three Local Workforce Development Areas: Greater Memphis, Southwest, and Northwest, encompassing a total of 21 counties. Of these, 11 counties increased in employment from 2021 to 2022, compared to 14 the previous year. The average number of establishments increased to 39,938 over the year and payroll increased by 4.36% percent to $43.1 billion. The increase in payroll was at a slower rate than the state but still accounts for nearly 1 in every four payroll dollars in the state.

The region's average unemployment rate decreased from 4.8 percent in 2021 to 4.2 percent in 2022. The labor force

decreased over the year. Youth unemployment in 2021 (the latest available) remained above the state average at 13.8%. However, this represented a decrease from 2021's 15.8 percent. The percent of those in poverty who were unemployed decreased to 17.3, down from the region's 2020 rate of 18.3 percent, but above the state rate of 14.3 percent. In 2022 the number of unemployed compared to the number of job listings on the state job bank, jobs4tn.gov, was 0.42 percent, still indicating more jobs than unemployed individuals in the region.

The labor force participation rate (LFPR) in the West Region in 2022 was 53.4 percent, 2 percentage points lower than the rate in 2021. However, despite this, the state's labor force participation rate increased to 58.6 percent in 2022 for the state of Tennessee. The largest decrease for the West Region was in the Greater Memphis LWDA. A significant decrease in labor force participation rate was also seen in the Southwest area. Unemployment rates in all three LWDAs dropped in 2022, as the economy recovered from the pandemic. The West region ended the year with an average rate of 4.2 percent. This rate is higher than the state's average of 3.4 percent.

Poverty rates declined from 18.3 percent in 2020 to 17.3 percent for the West Region in 2021, as federal aid was targeted to individuals with the greatest needs. The highest poverty rate in the region was in the Northwest LWDA at 18.79 percent. All the LWDAs in the West Region had poverty rates higher than the state's average. The 2022 rates should be lower, given the improving economy, but reducing poverty and increasing educational attainment should be key targets of workforce policy in this region.

Like the state, about a third of those not in the labor force have a disability, with Northwest LWDA having the highest rate. As could be expected due to economic conditions in 2020, youth unemployment increased over the 2020 rate of 15.77 percent in the West Region, with the highest rates in the Southwest and Greater Memphis LWDAs in 2021.

Significant Barriers to Employment

The table below identifies numbers of individuals with significant barriers to employment in the West Region, using the latest data available. The West Region has the following populations compared to the state:

- 37 percent of individuals exiting from the TANF program within 24 months.
- 28 percent of those below poverty.
- 30 percent of the prison and jail population.
- 23 percent of the youth population; and
- 26 percent of single parent families.

Table 17: West TN Region - Significant Barriers to Employment					
	Greater Memphis LWDA	Northwest LWDA	Southwest LWDA	West Region	State Total
Number of American Indians or Alaskan Natives alone	1693	635	450	2778	15,219
Population Ages 15-19	71,528	16,602	17,066	105,196	438,290
Population Ages 20-24	70,250	15,814	15,821	101,885	443,703
Population Ages 55+	257,242	74,673	73,582	405,497	1,784,308
Number of Veterans 2022	61,449	16,650	15,368	93,467	449,163
Number Below Poverty	185,116	39,562	38,752	263,430	927,587
Number With Disability	141,247	49,867	42,863	233,977	1,019,661
Number of Single Parent Families	231,628	48,580	47,669	327,877	1,234,824
Probationers and Parolees 2023	10,397	2,876	3,878	17,151	71,142
Community Correction	370	142	445	957	3,401
Mental Health Court Statistics (FY 2023)	39	0	0	39	96
Limited English Speaking	6566	496	865	7,927	42,056
Foster Care Services - Youth Aged 2022	138	30	23	191	801
Clients In Recovery Courts 2023	208	110	67	385	1,399
Disadvantaged Youth and Adults	123,895	32,555	34,240	190,690	693,590
TANF 24 Months From 2022	454	86	126	666	1,819
Prison Population 2023	1,887	5,206	0	7,093	19,063
Jail Population 2023	4,043	1,199	1,276	6,518	25,696

Table 17

(ii) Labor Market Trends

The five largest industry sectors in the West Region for 2022 were:

- Health care and social assistance (103,940 jobs)
- Transportation and warehousing (76,051)
- Manufacturing (73,546)
- Retail (71,675)
- Administrative and Support and Waste Management (59,883)

Compared to 2018, the industries adding the most workers include transportation and warehousing (over 8,500 new jobs), health care and social assistance (6,300 new jobs), and construction (over 2,000 new jobs), Some of the region's largest industries lost jobs from 2018 to 2022, including retail trade (nearly 5,000), administrative and support (1,800), and finance and insurance (1,800). In 2021, employment in accommodation and food services was still 13 percent below its employment level in 2018. In 2022, the industry is still 8 percent below its pre-pandemic level, although it seems to be recovering slowly. The transportation and material moving occupational group remains the largest in the West Region, according to the Occupational Employment and Wages Survey for 2022, which provides data on all industries except agriculture and the self-employed. Employment in this group in May 2022 was 105,090, adding more than 13,000 jobs since May 2015. Office and administrative support, sales, and production were next in total numbers of jobs.

The average annual industry wage in the region, calculated by dividing the total payroll by the average number of workers, was $51,874, which represented a 17% increase from 2021. Last year, the median occupational wage decreased by 0.4 percent to $36,969 for this region. In 2022, the median occupational wage increased by 6.7%, to $39,430. All industry sectors saw an increase from their pre-pandemic earnings per worker. The largest increases in earnings per worker were in the real estate rental and leasing, other services, and administrative and support and waste management industries. These three industries have seen their earnings per worker increase 30 and 29 percent from the pre-pandemic earnings, respectively. The industries with the highest earnings per worker were management of companies and enterprises, finance, and insurance, and utilities.

West Region Occupational Employment The transportation and material moving occupational group remains the largest in the West Region, according to the Occupational Employment and Wages Survey for 2022, which provides data on all industries except agriculture and the self-employed (Figure 7). Employment in this group in May 2022 was 105,090, adding more than 13,000 jobs since May 2015. Office and administrative support, sales, and production were next in total numbers of jobs. Over the sevenyear period 2015-2022, the occupational groups adding the largest percentage of new jobs were the computer and mathematical, business and finance, and community and social service occupational groups. Figures 7 and 8 display the largest occupational groups in the West Region and the occupational groups posting the most job openings in 2022.

(iii) Education and Skill Level of the Workforce

The Northwest LWDA reported the lowest rate of educational attainment in 2022, with 48.8 percent of the population aged 25 years or more having some college or additional education. However, the rate in the Greater Memphis LWDA was 61.1 percent, which is above state rate and the highest in the West Region.

The West Region of the state of Tennessee shows significant disparities concerning the post High School educational attainment of individuals based on their race or ethnic heritage. These disparities are not unique to the West Region of the state, as they reflect a pattern throughout the whole state.

In the West Region of the state, the attainment of a bachelor's degree or higher degree of individuals who are over the age of 25 and identify their race as White is 32.62 percent, which shows a significant disparity when compared to those who identify their race as Black (18.95), and those who identify their heritage as Hispanic or Latino (16.27).

Educational Attainment	West Region White Only	West Region Black Only	West Region Hispanic or Latino Only	Statewide White Only	Statewide Black Only	Statewide Hispanic or Latino Only
Population 25 years and over	568,046	392,468	37,801	3,701,360	725,820	194,222
High school graduate only	186,266	145,900	9,886	1,171,517	247,651	54,356
Percent high school graduate only	32.79%	37.18%	26.15%	31.65%	34.12%	27.99%
High school graduate or higher	514,538	340,256	23,074	3,317,421	636,892	125,079
Percent high school graduate or higher	90.58%	86.69%	61.04%	89.63%	87.75%	64.40%
Bachelor's degree or higher	185,313	74,402	6,151	1,114,827	159,001	33,770
Percent bachelor's degree or higher	32.62%	18.95%	16.27%	30.12%	21.91%	17.39%

For June 2023, the most requested technologies in the West Region include facility with Microsoft Office and Power Point, Word, Structured Query Language (SQL), operation of cash registers and forklifts, and use of personal protective equipment. Of the top 10 employers posting jobs in the West Region on July 25, 2023, 8 included hospitals and other healthcare institutions. Reflecting the top occupational groups and those adding the newest jobs, top job postings in the region included healthcare practitioners and technical occupations, management, transportation, and material moving, sales, office, and food preparation.

(iv) Skill Gaps

Demand: Healthcare and social assistance is expected to be the largest industry in Tennessee by 2030, with employment of healthcare practitioners and support workers expected to increase by more than 64,000.2 An important driver of this trend is the need to care for an aging population. The pandemic created additional burdens for the healthcare system in Tennessee which is experiencing increasing shortages of workers due to feelings of burnout and inadequate pay. Healthcare occupations, including registered nurses, were identified as eleven of the fifteen occupations experiencing the greatest supply gaps based on the number of job openings exceeding resumes for occupations requiring postsecondary education.3 Occupations in-demand in at least seven regions include licensed practical nurses, surgical technologists, physical therapy assistants, dental assistants, medical assistants, and phlebotomists. Other occupations in demand in more than half of local workforce development areas include speech language pathologists, diagnostic medical sonographers, pharmacy technicians, and medical records specialists.

Supply: Due to increasing demand, program completers in the health sciences have some of the highest employment rates of any career cluster. The highest employment rates for certificate completers paying above the median wage were or sterile processing technicians, MRI technicians, and psychiatric/mental health nurses (CPBA), and for associate degree completers, registered nurses, respiratory care therapists, medical laboratory technicians, and dental hygienists. For those with bachelor's degrees and above, they included radiographers, family practice nurses, doc- tors of physical therapy, and diagnostic medical sonographers.

Occupations with unmet needs by industry for West Region:

1. Manufacturing

- Tool Die Technicians

2. Transportation

- Heavy Tractor – Trailer Truck Drivers
- Industrial Truck and Tractor Operators
- Mobile Heavy Equipment Mechanics

3. Business, Finance, Government Management, Support

- Medical Records Administrators
- Accounting Technicians
- Business Statisticians
- Project Management Specialists
- Public Policy Specialists

4. Health Sciences

- Registered Nurses
- Respiratory Therapists
- Physical Therapists, Mental Health Nurses

5. Human Services

- Social and Behavioral Health Workers

6. Information technology

- Computer and IT Security

7. Education

- Early Childhood Educators
- Secondary Teachers
- Reading, English, Math, Art Teachers

8. Engineering, STEM

- Mechatronics, robotics, and automation engineering
- Chemical and Industrial Engineering Technology
- Computer Engineering Technology
- Computer Aided Design and Computer Aided Design and Drafting (CAD/CADD)

Advertised Job Skills Table for West Region

Rank	Advertised Detailed Job Skill	Advertised Skill Group	Job Opening Match Count
1	Customer service	Customer Service Skills	7,297
2	Preventative maintenance	Maintenance Technician Skills	612
3	Inventory control	Bill and Account Collectors Skills	547
4	Inventory management	Bill and Account Collectors Skills	530
5	Cash handling	Cashier Skills	515
6	Risk management	Risk Analyst Skills	484
7	Welding	Welding Skills	462
8	Typing	Office Clerk Skills	424
9	Developing new business	Business Development Skills	418
10	Food preparation	Food Preparation Worker Skills	411

Middle Region

(i) Employment and Unemployment

Total employment in the Middle Region, excluding agriculture and the self-employed, increased to 1,461,565. Labor force also increased in the Middle region.

The Middle Region consists of three Local Workforce Development Areas: Northern Middle, Southern Middle, and Upper Cumberland, encompassing a total of 40 counties. Of these, 29 counties increased employment as compared to 40 the year prior. This is an expected pattern as the year prior was a year of recovery for the Tennessee economy. The average number of establishments increased to 97,982 over the year and payroll increased by 11.4 percent to $85.9 billion. The increase in payroll was at a faster rate than the state.

The average unemployment rate decreased from 2021 to 2022 to 3.0 percent, which is less than the state annual average. Youth unemployment in 2021(the latest data available) is lower compared to the state rate of 11.4 percent. The percent of those in poverty was stable at 13.4 percent, below the state rate, yet higher for the Middle Region than last year.

The labor force participation rate (LFPR) in the Middle Region in 2022 was 58.73 percent, somewhat lower than the previous year. However, despite this, the state's labor force participation rate increased to 58.6 percent in 2022. The Middle Region's participation rate mirrors the states. The largest decrease for the Middle Region was in the Southern Middle LWDA, which was expected given the negative population growth. A significant decrease in labor force participation rate was also seen in the Northern Middle area.

Poverty rates declined from 13.9 percent in 2020 to 13.4 percent for the Middle Region in 2021, as federal aid was targeted to individuals with the greatest needs. The highest poverty rate in the region was in the Upper Cumberland LWDA at 16.7 percent. Upper Cumberland LWDA was the only LWDA in the Middle Region that had poverty rates higher than the state's average. The 2022 rates should have been lower, given the improving economy; reducing poverty and increasing educational attainment should be key targets of workforce policy in this region. Like the state, about a third of those not in the labor force have a disability, with Upper Cumberland LWDA having the highest rate.

Youth unemployment in the Middle Region increased slightly from 9.63 in 2020 to 9.89 in 2021.

Significant Barriers to Employment

The table below identifies numbers of individuals with significant barriers to employment in the Middle Region, using the latest data available. The Middle Region has the following populations greater than its share of the population in the state:

- 43 percent of individuals on probation or parole.
- 58 percent of those with limited English- speaking ability

LWDAs	Northern Middle TN LWDA	Southern Middle TN LWDA	Upper Cumberland LWDA	Middle Region	State
Number of American Indians or Alaskan Natives alone	5,580	1280	929	7,789	15,219
Population Ages 15-19	134,346	31,323	22,134	187,803	438,290

LWDAs	Northern Middle TN LWDA	Southern Middle TN LWDA	Upper Cumberland LWDA	Middle Region	State
Population Ages 20-24	139,907	26,953	22,911	189,771	443,703
Population Ages 55+	509,632	158,632	126,627	794,891	2,022,778
Number of Veterans 2022	119,735	30,289	22,849	172,873	423,042
Number Below Poverty	213,708	58,774	58,453	330,935	955,929
Number With Disability	238,769	74,512	65,836	379,117	1,025,259
Number of Single Parent Families	341,445	73,965	58,825	474,235	1,234,824
Probationers and Parolees 2023	22,572	4,305	3,629	30,506	71,142
Community Correction 2023	1,648	5	106	1,759	3,401
Mental Health Court Statistics (FY 2023)	47	0	0	47	96
Limited English Speaking	22,856	821	64	24,331	42,056
Foster Care Services - Youth (Aged 2022)	192	68	52	312	801
Clients In Recovery Courts (2023)	400	45	108	553	1,399
Disadvantaged Youth and Adults	157,655	45,750	40,300	243,705	693,590
TANF 24 Months from 2022	348	112	60	520	1,816
Prison Population 2023	4,263	2,437	0	6,700	19,063
Jail Population 2023	5,646	1,901	1,515	9,065	25,696

(ii) Labor Market Trends

The five largest industry sectors in the Middle Region for 2022 were:

- Healthcare and social assistance (178,447)
- Retail Trade (135,359)
- Manufacturing (139,351)
- Accommodation and Food Services (131,314)
- Educational Services (96,674)

Compared to 2018, the industries adding the most new workers included the transportation and warehousing (20,657 new jobs), professional, scientific, and technical (13,049) and construction (13,705) industries. Only one industry, manufacturing, lost jobs from 2018 to 2022 (1,009). With this increase, accommodation and food services reported a growth of 3% since 2018, thus increasing its employment numbers post-pandemic. The most rapid growth was in the information, construction and transportation and warehousing sectors. The industries with the highest earnings per worker were the management of companies and enterprises, finance, and insurance, professional, scientific, and technical, and information industries. The lowest earnings per employee were in the accommodation and food services industries.

The office and administrative support occupational group remained the largest in the Middle Region, according to the Occupational Employment and Wages Survey for 2022, which provides data on all industries except agriculture and the self-employed. Employment in this group in May 2022 was 184,660; however, it decreased employment by 3% since 2015. The next three largest industries were transportation and material moving, sales and related, and food preparation and serving. Sales and related jobs declined during the pandemic as e-commerce expanded. This group in 2022 has recovered and has employment at about the same level as in 2015.

Occupational groups that added the most jobs from 2015 to 2022 included transportation and material moving, computer and mathematical, business and finance, management, healthcare practitioners and technical, and construction. Office and administrative support and personal care and service lost the most jobs over the seven-year period. Other than management, the occupational groups with the highest median earnings included computer and mathematical, architecture and engineering, legal, healthcare practitioners and technical, and business and finance. These earnings results show the importance of STEM education and training in achieving higher earning.

(iii) Education and Skill Level of the Workforce

The Upper Cumberland LWDA reported the lowest rate of educational attainment in 2021, with 43.2 percent of the population aged 25 years or more having some college or additional education. In contrast, the rate in the Northern Middle LWDA was 66.8 percent, well above the state's average.

The Middle Region of the state of Tennessee shows significant disparities concerning the post high school educational attainment of individuals based on their race or ethnic heritage. These disparities are not unique to the Middle Region, as they reflect a pattern throughout the whole state. In the Middle Region, the attainment of a bachelor's degree or higher by individuals who are over the age of 25 and identify their race as White is 33.39 percent, which shows a

significant disparity when compared to those who identify their race as Black (28.50), and those who identify their heritage as Hispanic or Latino (18.59)

Educational Attainment	Middle Region White Only	Middle Region Black Only	Middle Region Hispanic or Latino Only	Statewide White Only	Statewide Black Only	Statewide Hispanic or Latino Only
Population 25 years and over	1,534,019	230,544	100,658	3,701,360	725,820	194,222
High school graduate only	474,318	68,564	19,937	1,171,517	247,651	54,356
Percent high school graduate only	30.92%	29.74%	19.81%	31.65%	34.12%	27.99%
High school graduate or higher	1,388,732	206,950	68,012	3,317,421	636,892	125,079
Percent high school graduate or higher	90.53%	89.77%	67.57%	89.63%	87.75%	64.40%
Bachelor degree or higher	512,239	65,703	18,717	1,114,827	159,001	33,770
Percent bachelor degree or higher	33.39%	28.50%	18.59%	30.12%	21.91%	17.39%

The most requested certifications in the Middle Region are CPR, commercial driver license, CPA, and nursing leadership certifications. For June 2023, the most requested tools and technologies include facility with Microsoft Office and Power Point, SQL, Python, operation of cash registers and forklifts, and use of personal protective equipment.

Of the top 10 employers posting jobs in the Middle Region on August 1, 2023, 4 included hospitals and other healthcare employers, as well as Kroger, Metro Nashville public schools, and fast-food companies. Reflecting the top occupational groups and those adding the most new jobs, top job postings in the region included healthcare practitioners and technical occupations, management, sales, and food related occupations.

(iv) Skill Gaps

Demand: Tennessee is a leading state in transportation, distribution, and logistics. The transportation cluster contains several occupations that are in-demand statewide and in every region of the state, including automotive service technicians and mechanics; bus and truck mechanics and diesel engine specialists; production, planning, and expediting clerks; heavy and tractor-trailer truck drivers; industrial truck and tractor operators; and mobile heavy equipment mechanics.

Supply: Several TCAT programs train Tennesseans in this cluster who remain in Tennessee to work. The highest employment rates for certificate programs were logistics and supply chain management at 62 percent and diesel mechanics technology at 54 percent. First-year wages for the bachelor's degree program in logistics was $53,062, and for the master's degree, $90,607. High school CTE concentrators in autobody collision repair and diesel mechanics were employed in Tennessee at rates of more than 60 percent. This cluster had 121 apprenticeship completers.

Occupations with unmet needs by industry for Middle Region:

1. Manufacturing

- Electromechanical Engineering Technicians

2. Transportation

- Heavy Tractor – Trailer Truck Drivers
- Industrial Truck and Tractor Operators
- Mobile Heavy Equipment Mechanics

3. Business, Finance, Government Management, Support

- Medical Records Administrators
- Accounting Technicians
- Business Statisticians
- Project Management Specialists
- Public Policy Specialists

4. Health Sciences

- Respiratory Therapists
- Physical Therapists, Mental Health Nurses

5. Human Services

- Social and Behavioral Health Workers

6. Information technology

- Computer and IT Security

7. Education

- Early Childhood Educators
- Secondary Educators
- Reading, Math, English, and Art Teachers

Advertised Job Skills Table for Middle Region

Rank	Advertised Detailed Job Skill	Advertised Skill Group	Job Opening Match Count
1	Customer service	Customer Service Skills	19,463
2	Inventory management	Bill and Account Collectors Skills	1,624
3	Cash handling	Cashier Skills	1,531
4	Developing new business	Business Development Skills	1,442

Rank	Advertised Detailed Job Skill	Advertised Skill Group	Job Opening Match Count
5	Preventative maintenance	Maintenance Technician Skills	1,361
6	Inventory control	Bill and Account Collectors Skills	1,250
7	Food preparation	Food Preparation Worker Skills	1,170
8	Risk management	Risk Analyst Skills	1,115
9	Typing	Office Clerk Skills	1,099
10	Word processing	Office Clerk Skills	869

East Region

Total employment in the East Region, excluding agriculture and the self-employed, increased from 1,088055 in 2021 to 1,097,691 in 2022. Overall unemployment for the region decreased from 4.3 to 3.4, the same as the yearly average for the state. The two large metropolitan statistical areas in the Region, Chattanooga and Knoxville, increased employment.

The East Region consists of three Local Workforce Development Areas: Northeast, Southeast, and East, encompassing a total of 34 counties. Of these, 29 counties increased employment compared to 34 the year prior. This is an expected pattern as the year prior was a year of recovery for the Tennessee economy. The average number of establishments increased to 67,643 over the year and payroll increased by 9.2 percent to $58.1 billion.

The average annual industry wage in the region, calculated by dividing the total payroll by the average number of workers, increased by over 20 percent to $56,372 from $46,124. The median occupational wage increased by 8.5 percent to $38,532, which is slightly below the state's median.

The labor force increased over the year by over 80,000 persons. Youth unemployment in 2021(the latest data available) is slightly lower compared to the state rate of 11.4 percent. The percent of those in poverty was stable at 15.3 percent, below the state rate, and lower for the East Region last year.

The labor force participation rate (LFPR) in the East Region in 2022 was 56.8 percent, somewhat lower than the previous year. However, despite this, the state's labor force participation rate increased to 58.6 percent in 2022. The largest decrease for the East Region was in the Northeast LWDA, although it was minimal, following the pattern set by the region.

Poverty rates remained stagnant from 15.2 percent in 2020 to 15.3 percent for the East Region in 2021, as federal aid was targeted to individuals with the greatest needs. The highest poverty rate in the region was in the Southeast LWDA at 18.8 percent. Northeast also reported higher than state average poverty rates in 2021. The 2021 rates should have been lower, given the improving economy; reducing poverty and increasing educational attainment should be key targets of workforce policy in this region.

Following the pattern set by state data, more than a third of those not in the labor force had a disability, with Northeast LWDA having the highest rate. Youth unemployment in the East Region decreased slightly from 10.97 in 2020 to 10.60 in 2021.

Significant Barriers to Employment

The table below identifies numbers of individuals with significant barriers to employment in the East Region, using the latest data available. The East Region in 2021 had 35 percent of the state's population, with the following higher percent of the populations below compared to its proportion of the state's population:

- 30 percent of the American Indian/ Alaska native population.
- 45 percent of the 55 and over population.
- 34 percent of the prison and jail population.
- 37 percent of the veteran population.
- 37 percent of those below poverty.
- 39 percent of those with disabilities.
- 37 percent of the population of those aging out of foster care.

In addition, the number of individuals with access to mental health courts is very low. The growing importance of these intervention services is being recognized nationally and needs expansion in Tennessee.

LWDA	Northeast LWDA	East LWDA	Southeast LWDA	West Region	State Total
Number of American Indians or Alaskan Natives alone	909	2440	1303	4652	15,219
Population Ages 15-19	38,528	83,422	41,142	163,092	438,290
Population Ages 20-24	32,305	78,180	39,488	149,973	443,703
Population Ages 55+	181,970	406,657	209,364	797,991	1,784,308
Number of Veterans 2022	39,692	86,556	40,149	166,397	449,163
Number Below Poverty	82,656	171,071	90,152	343,879	927,587
Number With Disability	102,094	187,125	112,242	401,461	1,019,661

LWDA	Northeast LWDA	East LWDA	Southeast LWDA	West Region	State Total
Number of Single Parent Families	97,636	214,500	120,576	432,712	1,234,824
Probationers and Parolees 2023	5,953	12,596	4,883	23,432	71,142
Community Correction 2023	356	117	212	685	3,401
Mental Health Court Statistics (FY 2023)	0	0	10	10	96
Limited English Speaking	919	5,879	3,100	9,798	42,056
Foster Care Services - Youth Aged 2022	45	189	64	298	801
Clients In Recovery Courts 2023	65	312	84	461	1,399
Disadvantaged Youth and Adults	61,910	127,625	69,660	259,195	693,590
TANF 24 Months From 2022	176	267	190	633	1,816
Prison Population Total 2023	1,393	1,934	1,943	5,270	19,063
Jail Population Total 2023	2,728	4,558	2,819	10,105	25,696

(ii) Labor Market Trends

Compared to 2018, the industries adding the most workers included the manufacturing (10,556), professional, scientific, and technical (7,641), and transportation and warehousing (5,203) industries. One of the largest industries, Healthcare and Social Assistance, has yet to regain its pre-pandemic level of employment. Despite showing negative growth from previously, accommodation and food services and educational services have reported growth in their industries surpassing 2018 levels. All except one industry sector increased its earnings per worker (total LWDA payroll divided by the average number of workers). The largest increases were in the accommodation and food services, administration and support, and real estate and rental and leasing. The industries with the highest earnings per worker were the management of companies and enterprises, utilities, and professional, scientific, and technical industries. The lowest earnings per worker were in the accommodations and food services industry.

The office and administrative support occupational group remains the largest in the East Region, according to the Occupational Employment and Wages Survey for 2022, which provides

data on all industries except agriculture and the self-employed. Employment in this group in May 2022 was 142,0410; however, it decreased by 10% between 2015 and 2022. Transportation and material moving, production, and food preparation and serving were next largest in total numbers of jobs.

Occupational groups which added the most jobs from 2015 to 2022 included transportation and material moving, business and finance, construction and extraction, and production. Office and administrative support, sales and related, and personal care and service occupations lost the most jobs over the seven- year period. Other than management, the occupational groups with the highest median earnings included architecture and engineering, computer and mathematical, life, physical and social science, and legal occupations. These earnings results show the importance of STEM education and training in achieving higher earnings.

(iii) Education and Skill Level of the Workforce

The Northeast LWDA reported the lowest rate of educational attainment in 2021, with just under 52.2 percent of the population aged 25 years or more having some college or additional education.

The East Region shows significant disparities among the post high school educational attainment of individuals based on their race or ethnic heritage. These disparities are not unique to the East Region, as they reflect a pattern throughout the whole state. In the East Region, the attainment of a bachelor's degree or higher by individuals who are over the age of 25 and identify their race as White is 26.34 percent, which shows a significant disparity when compared to those who identify their race as Black (18.99) and those who identify their heritage as Hispanic or Latino (16.14).

Educational Attainment	East Region White Only	East Region Black Only	East Region Hispanic or Latino Only	Statewide White Only	Statewide Black Only	Statewide Hispanic or Latino Only
Population 25 years and over	1,535,079	94,508	52,723	3,701,360	725,820	194,222
High school graduate only	505,676	33,516	16,786	1,171,517	247,651	54,356
Percent high school graduate only	32.94%	35.46%	31.84%	31.65%	34.12%	27.99%
High school graduate or higher	1,358,277	82,183	18,388	3,317,421	636,892	125,079
Percent high school graduate or higher	88.48%	86.96%	34.88%	89.63%	87.75%	64.40%
Bachelor degree or higher	404,399	17,948	8,511	1,114,827	159,001	33,770
Percent bachelor degree or higher	26.34%	18.99%	16.14%	30.12%	21.91%	17.39%

The most requested certifications in the East region are nursing credentials, CPR, commercial driver license certifications, first aid, and emergency medical technician. For June 2023, the most requested technologies included facility with Microsoft Office, HTML, operation of cash registers and forklifts, and use of personal protective equipment among others.

Of the top 10 employers posting jobs in the East Region on September 1, 2022, 4 included healthcare institutions; others included grocery stores/food marts, Oak Ridge National

Laboratory, and the University of Tennessee. Reflecting the top occupational groups and those adding the most new jobs, top job postings in the region included healthcare practitioners and technical occupations, management, sales, and transportation and material moving occupations.

(iv) Skill Gaps

Demand: Tennessee has done an exceptional job of growing one of the strongest s pecialized manufacturing workforces in the country. As Tennessee expands its manufacturing investments, there are many occupations in-demand across the state, including first line supervisors of mechanics, installers, and repairers and production workers; general maintenance and repair workers; machinists; welders; inspectors, testers, sorters, samplers, and weighers; food batchmakers; and computer numerically controlled tool operators.

Supply: Multiple
certificate programs had employment rates of 60 percent or more among completers. Hig h school CTE
programs in the Manufacturing cluster including machine shop assistant, electromechanica l technologies, mechatronics, and welding had employment rates of 56 percent or more, although salaries were low. Over 600 credentials in machine tool technology were awarded by TCATs and community colleges in 2020-21. Over 2,440 welding credentials were issued, including postsecondary certificates and CTE concentrators.

Occupations with unmet needs by industry for East Region:

1. Transportation

- Heavy Tractor – Trailer Truck Drivers
- Industrial Truck and Tractor Operators
- Mobile Heavy Equipment Mechanics

2. Business, Finance, Government Management, Support

- Medical Records Administrators
- Accounting Technicians
- Business Statisticians
- Project Management Specialists
- Public Policy Specialists

3. Health Sciences

- Respiratory Therapists
- MRI Technicians
- Medical Laboratory Personnel

4. Human Services

- Childcare Workers
- School Counselors

- Social and Behavioral Health Workers

5. Information technology

- Medical Informatics

6. Education

- Early Childhood Educators
- Secondary Teachers
- Reading, Math, English, and Art Teachers

7. Engineering, STEM

- Mechatronics, robotics, and automation engineering
- Chemical and Industrial Engineering Technology
- Computer Engineering Technology
- Computer Aided Design and Computer Aided Design and Drafting (CAD/CADD)

Advertised Job Skills Table for East Region

Rank	Advertised Detailed Tool or Technology	Advertised Tool and Technology Group	Job Opening Match Count
1	Microsoft (MS) Office	Office Suite Software	3,533
2	Hypertext markup language (HTML)	Web Platform Development Software	1,794
3	Forklift	Forklifts	1,382
4	Cash Register	Cash Registers	1,338
5	Microsoft PowerPoint	Presentation Software	1,258
6	Personal protective equipment	Hazardous Material Protective Apparel	1,186
7	Motor vehicles	Automobiles or Cars	1,075
8	Microsoft Word	Word Processing Software	862
9	Cell Phone	Mobile Phones	659
10	Constant Contact	Customer Relationship Management (CRM) Software	644

C. COMPARISON OF ECONOMIC AND WORKFORCE ANALYTICAL CONCLUSION. DESCRIBE AREAS OF OPPORTUNITY FOR MEETING HIRING, EDUCATION, AND SKILLS NEEDS IDENTIFIED

IN THE ECONOMY COMPARED TO THE ASSETS AVAILABLE IN THE LABOR FORCE IN THE STATE.

A comparison of the economic and workforce analysis is provided within each section and for multiple areas (state, west, middle and east). While there are some unique differences across the regions, the state will continue to focus on the emerging industries through 20230, as identified in this plan. Additionally, Tennessee's new efforts to support the manufacturing of electric vehicles and batteries will remain a concentrated focus for both economic and workforce growth across the state. Finally, the infusion of infrastructure funding across the state and the region will continue to present new, currently non-existent workforce needs that the state is proactively researching and coordinating service provision for success.

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 [6] and optional one-stop delivery system partners.[7]

[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.

Activities of the State Workforce Development Board, including strengths and weaknesses and capacity, are detailed further in the Operational Planning Elements of this plan. Some examples include but are not limited to: innovative partnerships with non-core partners for alternative service delivery, co-location of services, and specific business and industry partnerships to meet newly identified needs.

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.

Regarding 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.

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. 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 TNDLWD 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 TNDLWD 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.

As further detailed in the assessment results received on recent program activities, the Tennessee Department of Labor and Workforce Development recently completed an assessment of American Job Center services and Adult Education program provision. The State's research and data analysis goals are to determine which existing workforce services are effective, highlight current gaps in service delivery, and identify services that may no longer be impactful. The outcomes of this evaluation offer recommendations that incorporate local, statewide, and national best practices.

The recommendations are as follows, including notations of strengths and weaknesses of workforce development activities. For those the areas of weakness, TDLWD is currently developing next steps for recommendation implementation, organizational changes, reimagined outreach campaigns and other strategies to deepen and improve the efficiency and effectiveness of workforce development activities across the state.

1. Strength service integration and increase co-enrollment

2. Increase service utilization and awareness among all communities

Weakness: outreach and marketing of AJC services

3. Design and provide intensive, individualized services to enhance employment outcomes

Weakness: poor candidate quality and employer awareness and use of AJC services

4. Identify causes and missing leading practices to enhance efficiency

5. Deepen and track community partnerships and increase access points to customers

Strength: established virtual AJC services

Weakness: low usage of virtual AJC services

6. Focus on staff development, knowledge transferring, and cultural change

Strength: strong institutional knowledge with longevity in program experience

Weakness: poor knowledge transfer and cross training of staff to retain deep institutional knowledge

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[8] and other populations.[9]

(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, which may include evaluation findings, and other feedback to make continuous or quality improvements.

1. Vision

Execution of a comprehensive and cohesive workforce development strategy must 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 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].

Figure 1: The Tennessee Workforce Development System

Guided by the directives of the State Workforce Development Board, as articulated in their recommendations to Governor Bill Lee, the Tennessee Department of Labor & Workforce Development has been tasked with formulating a comprehensive State plan. This plan aims to seamlessly unify the service delivery of all programs, with the overarching objective of enhancing positive outcomes for the residents of Tennessee who engage with our programs. The central focus of this initiative is to optimize co-enrollment opportunities, establish novel intake and referral processes across programs, and create a reporting system that facilitates more thorough analysis of performance and outcomes.

Aligned with the strategy of fostering tighter integration among programs, the State has initiated a Key Performance Indicator initiative. This initiative furnishes performance and planning resources to the Local Workforce Development Areas (LWDA) across all major programs. The ongoing progress has empowered LWDA to visualize opportunities for enhancing the performance of all programs and conceptualize strategies to maximize co-enrollment.

Operating within the framework delineated for the TNWDS, the primary objective is to activate various programs in a more intentional and integrated manner. This approach is designed to align with the state's vision of implementing a multi-agency strategy that better serves the residents of Tennessee. Consequently, the integration of all workforce programs into the TNWDS supports the State Workforce Board's vision to boost participation and performance in a more cohesive manner.

The evolving progress underscores the efficacy of a multi-agency strategy coupled with an emphasis on streamlined program integration. The Re-Employment strategy for TNWDS has provided a platform for Title I, Title II, Title III, and Title IV programs to collaboratively develop new procedures, incorporating resources from higher education and other public programs.

The ultimate vision is to enhance the performance of each program individually by collectively augmenting service capacity through an integrated approach. The execution of department-wide strategic initiatives and goals outlined in this section supports integrated service delivery for both job seekers and employers, in line with the overarching vision.

As a specialized focus on services to support this vision, the state has established the Tennessee Office of Reentry, continued services for veterans and transitioning military and spouses and well as partnered with the Tennessee Department of Human Services to provide SNAP E&T services amongst other services. These partnerships provide a concentrated focus on various individuals who have additional barriers to employment and a coordinated engagement with business and industry to secure employment opportunities various types of jobseekers. Additional details about each program are as a follow:

Tennessee Office of Reentry

The Tennessee Office of Reentry (TOOR) was launched in July 2021 with the mission to help people exiting incarceration succeed in the community by removing barriers and improving state-coordinated reentry processes, focusing on employment as a starting point. Housed within the Department of Labor and Workforce Development, TOOR was established by Governor Bill Lee as a recognition of the importance that stable employment has on reducing recidivism and focuses on three goals: assist justice involved individuals overcome barriers to employment, increase successful reentry, and reduce recidivism. In partnership with the local American Job Centers, TOOR provides strategic guidance and state funding (through a competitive grant process) to community-based organizations, local workforce development boards, faith-based organizations, for profit and nonprofit entities that have proven success in supporting justice involved individuals to gain the necessary workforce training and supportive services to successfully gain and retain employment. Additionally, education and engagement of business and industry partners has proven to be a vital piece of the success of TOOR's work, dispelling myths about second chance hiring and connecting other resources within TDLWD (Work Opportunity Tax Credit, Federal Boarding, etc.) to support employers as they recruit and retain justice involved individuals as employees.

Transitioning Military, Veterans and Spouses

In partnership with the AJC network across the state, JVSG as a SWA offers a variety of services that include resource centers, job fairs, workshops, employment strategies, career counseling, job search assistance, access to job training and certifications, and labor market information. The dedicated staff regularly assist veterans and covered persons find long term suitable employment and gain access to training and education opportunities. Disabled Veteran Outreach Program Specialists (DVOP) provide individualized career services to a targeted population of veterans and eligible persons who have been identified as having significant barriers to employment, and who are economically or educationally disadvantaged to compete in today's labor market. Similarly, Local Veterans Employment Representative (LVER) conduct employer outreach to promote to employers the advantages of hiring veterans. LVER staff also plan and participate in job fairs, conduct job clubs, and coordinate with apprenticeship and internship programs, business organizations, unions in promoting and advocating the benefits of training programs for veterans.

SCSEP

Senior workers are a vital pipeline in workforce development and expansion across Tennessee. The Senior Community Service Employment Program (SCSEP) provides work-based training for seniors 55 and older, who are currently unemployed and in need of updating their

skills. There are several job opportunities across the state that are primarily managed by the state program director. As outlined in the federal program requirements, interested participants receive the following services:

- Assessments to determine individual needs for training
- Training consists of upgrading existing skills, developing new skills, limited educational opportunities, job counseling, and assistance in finding and keeping a job
- Placement is closely matched with seniors' personal goals when placed in a position in community service (nonprofit, public, or private sector) for approximately 20 hours per week
- Participants receive the federal minimum wage of $7.25 per hour

Pending the results of the assessment and development of an employment plan, participants are eligible for the following types of job opportunities:

- Teacher's aides
- Nurse's aides
- Library clerks
- Clerical workers
- Adult and child day care assistants
- Campground recreational coordinators
- Maintenance workers

Engaging more individuals to participate in the state's Apprenticeship, Reentry, Senior Worker and Youth programs will prepare tens of thousands of people to enter or advance within our labor force. Employing sector strategies in our business community will help strengthen partnerships that will grow our economy from Union City to Johnson City.

2. Goals

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.

Above and beyond the performance goals required under WIOA, TDLWD has developed a four-year roadmap for us to travel Tennessee engaging, employing, and enhancing how we provide meaningful and safe employment to all Tennesseans and a skilled and qualified workforce for our employees. There are several strategic and operational goals the department has identified,

however, for the purpose of achieving the vision based on the workforce and the State's economic conditions, workforce, and workforce development activities, only 5 will be mentioned in this plan.

- Goal 1: Increase/Sustain Competitive Labor Force Participation Rate
- Goal 2: Expand Data Research and Analytics
- Goal 3: Implement an Agency-Wide Business Engagement Plan
- Goal 4: Superior Service Delivery Across the Public Workforce System
- Goal 5: Revisioning Unemployment Insurance

3. Performance Goals

TN Core Program: Title I – Adult Program

TN Core Program: Title I – Adult Program	Program Year 2024 Expected Level	Program Year 2024 Negotiated Level	Program Year 2025 Expected Level	Program Year 2025 Negotiated Level
Employment (Second Quarter after Exit)	83.45%		83.95%	
Employment (Fourth Quarter after Exit)	82.00%		82.50%	
Median Earnings (Second Quarter after Exit)	$7,800		$7,850	
Credential Attainment Rate	72.40%		72.90%	
Measurable Skill Gains	72.35%		72.85%	

TN Core Program: Title I – Dislocated Worker Program

TN Core Program: Title I – Dislocated Worker Program	Program Year 2024 Expected Level	Program Year 2024 Negotiated Level	Program Year 2025 Expected Level	Program Year 2025 Negotiated Level
Employment (Second Quarter after Exit)	84.30%		84.80%	

TN Core Program: Title I – Dislocated Worker Program	Program Year 2024 Expected Level	Program Year 2024 Negotiated Level	Program Year 2025 Expected Level	Program Year 2025 Negotiated Level
Employment (Fourth Quarter after Exit)	83.35%		83.85%	
Median Earnings (Second Quarter after Exit)	$8,699		$8,749	
Credential Attainment Rate	69.90%		70.40%	
Measurable Skill Gains	73.95%		74.45%	

TN Core Program: Title I – Youth Program

TN Core Program: Title I – Youth Program	Program Year 2024 Expected Level	Program Year 2024 Negotiated Level	Program Year 2025 Expected Level	Program Year 2025 Negotiated Level
Employment (Second Quarter after Exit)	82.55%		83.05%	
Employment (Fourth Quarter after Exit)	80.15%		80.65%	
Median Earnings (Second Quarter after Exit)	$5,234		$5,284	
Credential Attainment Rate	64.50%		65.00%	
Measurable Skill Gains	60.30%		60.80%	

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

TN Core Program: Title II – Adult Education and Family Literacy Act Program	**PY 2024 Expected Level**	**PY 2025 Expected Level**	**PY 2026 Expected Level**	**PY 2027 Expected Level**
Employment (Second Quarter After Exit)	50.0%	50.5%	51.0%	51.5%
Employment (Fourth Quarter After Exit)	50.0%	50.5%	51.0%	51.5%
Median Earnings (Second Quarter After Exit)	$3,950	$4,000	$4,050	$4,100
Credential Attainment Rate	42.0%	42.5%	43.0%	43.5%
Measurable Skill Gains	40.5%	41.0%	41.5%	42%
Effectiveness in Serving Employers	Not Applicable 1	Not Applicable 1	Not Applicable 1	Not Applicable 1

TN Core Program: Wagner-Peyser Act Employment Service Program

TN Core Program: Wagner-Peyser Act Employment Service Program	Program Year 2024 Expected Level	Program Year 2024 Negotiated Level	Program Year 2025 Expected Level	Program Year 2025 Negotiated Level
Employment (Second Quarter after Exit)	84.30%		84.80%	
Employment (Fourth Quarter after Exit)	83.35%		83.85%	
Median Earnings (Second Quarter after Exit)	$8,699		$8,749	
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable

TN Core Program: Wagner-Peyser Act Employment Service Program	Program Year 2024 Expected Level	Program Year 2024 Negotiated Level	Program Year 2025 Expected Level	Program Year 2025 Negotiated Level
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable

TN Core Program: Vocational Rehabilitation Program

TN Core Program: Vocational Rehabilitation Program	Program Year 2024 Expected Level	Program Year 2024 Negotiated Level	Program Year 2025 Expected Level	Program Year 2025 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.

TDLWD in partnership with a third-party contractor completed an assessment of the American Job Centers and Adult Education programs in Q1 2024. The evaluation focused on the workforce system and supporting infrastructure to better understand the operations of the department that support AJC service delivery and Adult Education to help improve the customer experience and identify possible strategies to strengthen the implementation of reforms introduced by WIOA. To complete the evaluation, we conducted a concise review of the customer experience (of both employer and job seeker customers) in the TN workforce system infrastructure through online surveys of staff and managers and by conducting mystery shopper visits to selected sites. Additionally, we assessed the services provided through local AJCs and the Adult Education program to identify gaps in services and populations served. This was achieved by analyzing program-level data and conducting online focus groups with AJC and Adult Education staff and managers as well as state employers. Using the information from these efforts, the executive leadership team is evaluating a proposed communication and outreach strategy to reach key audiences and move them to action.

TDLWD leadership is still reviewing the report findings and determining what recommendations will be implemented across the AJCs and AE programs.

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

Aligning Tennessee's local workforce development areas with Tennessee's Economic and Community Development (ECD) regions, 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. 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 as valuable tools for advancing its workforce.

Drive to 55

The Drive to 55 Alliance is more than a higher education initiative; it embodies a broader mission encompassing workforce and economic development. Its aim is not only to decrease unemployment but also to enhance the quality of life for residents of Tennessee. The Alliance is dedicated to fostering increased awareness, ownership, and support from the private sector for the comprehensive, long-term measures required in areas such as college entry and completion,

adult education and training, and addressing and bridging skills gaps. The overarching objective of the Alliance is to ensure that, by the year 2025, 55 percent of Tennesseans attain a college degree or certificate, thereby preparing both our workforce and the state for the challenges and opportunities of the future. This initiative includes two primary programs:

1. *Tennessee Promise* is a scholarship program to help more Tennessee high school graduates attend college. The program offers high school graduates two years of community or technical college tuition-free. Volunteer mentors are critical to the program's success. TNAchieves is the Tennessee Promise mentorship organization that recruits and supports mentors for students across the state. Tennessee Promise participants must complete and submit eight (8) hours of community service per term enrolled, as well as maintain satisfactory academic progress (2.0 GPA) at their respective institution. TDLWD supports this initiative by providing volunteer mentors.

2. *Tennessee ReConnect* targets adults who do not already have an associate or bachelor's degree by enabling them to attend community college or technical college tuition-free. TDLWD supports this initiative by training staff to become Tennessee ReConnect Ambassadors.

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 boards' 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.

More details on the state's apprenticeship strategy are provided later in this plan. Those details support the unique needs and concerns of Tennesseans and business and industry that needs skilled and trained workforce and is willing to collaborate in developing the workforce pipeline.

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.

Digital Equity

Led by the Office of Broadband at the Tennessee Department of Economic and Community Development, the findings presented in Tennessee's Digital Opportunity Plan made it evident that Tennesseans require more access to digital skilling and workforce development trainings. As the digital economy continues to shape our society, quality and abundant training opportunities are crucial to ensuring that Tennesseans have access to new types of high-paying and in-demand employment opportunities. One way TNECD aims to meet this need is by supporting efforts statewide, including TDLWD's jail tablets program that provides educational advancement opportunities for incarcerated Tennesseans. Pending funding and program availability and alignment, additional opportunities for collaboration and partnership, specifically related to broadband accessibility, infrastructure and access will continue to be implemented between both departments.

Southeast Region Electric Vehicle Collaborative

In partnership with Department of Labor Employment and Training Administration, Region III (Atlanta), the Southeast Region Electric Vehicle (EV) Industry Collaborative, the following states collectively are referred to as the Partners: Alabama Department of Labor, Florida Department of Economic Opportunity, Georgia Department of Labor, Kentucky Education and Labor Cabinet, Mississippi Department of Employment Security, North Carolina Department of Commerce & Workforce Solutions, South Carolina Department of Employment and Workforce, and the Tennessee Department of Labor and Workforce.

The Southeast Region EV Consortium of Partners aims to coordinate engagement in the region for state and local workforce agencies, educational institutions, partner organizations, and businesses in the electric vehicle sector; and create career-building experiential opportunities for job seekers through identified goals, top priorities, and alignment of strategies throughout this agreement.

Each partner has agreed to the Statement of Work and Guiding Principles which serve as a functional tool for how state Partners will work together to achieve a unified vision to support the EV Sector across the Southeast Region III. The state Partners agree to establish and maintain a framework of cooperation, collaboration, and communication in establishing pathways to good jobs that include attainable entry-level certifications in the Electric Vehicle industry, as well as upskilling credentialed job seekers and helping transition them into the clean advanced energy sector. Employer engagement support and coordination of workforce resources are critical to the success of the consortium’s mission.

The collaborative has agreed to designated roles and responsibilities as follows:

DOL ETA Region III will serve as the coordinating entity for all workforce development Partners and stakeholders to ensure alignment and effectiveness. The partners in the Southeast Region Electric Vehicle Industry Collaborative agree to work cooperatively to prevent duplication of services and to streamline and coordinate services delivered throughout the workforce

ecosystem. The Partners commit to attending meetings and supporting the EV Collaborative's work.

The EV collaborative has identified the following goals:

1. Create a Repository Landing Page to house regional "Partner" data which will include the selected top priorities below:
    a. EV Engagement Speech
    b. Identify Core Competencies
    c. Shared Policies to provide regional alignment
2. Develop a framework on how to engage with employers in the EV Sector.
3. Develop an EV Articulation Agreement and Course Equivalency.
4. Use a regional credentialing system to identify where applicants are on the pathway to better jobs HS / Baseline Certificates, Upskill Certificates, Associate Degree, Bachelor's Degree.
5. Create outreach tools to identify and target entry certifications and paths to good jobs within a sector or industry.

- Targeting: high school students, marginalized populations, re-entry program participants, and Veterans.

6. Develop a regional workforce pipeline service plan.

The department looks forward to the continued collaboration and success of each state's expansion in the electric vehicle industry and greatly appreciates the support of the region in coordinating and expanding such partnerships.

Metropolitan Development and Housing Agency

As an innovative approach to service delivery and immediate needs identified across the state, TDLWD – Division of Workforce Services has partnered with the Metropolitan Development and Housing Agency (MDHA) and the America Job Center Network of Partner to provide on-site services at the two local housing developments in the Metro Nashville area. This pilot program will provide Title I and Title III Programs, the Youth Employment Program, Homeless Veterans Program (HVRP), reverse referrals for SNAP E&T, Reentry, and Adult Education, as appropriate. Additional supportive services such as childcare, transportation, and partner program training will also be provided as identified per participant.

Roles and responsibilities have been identified and the department anticipates changes as the partnership evolves and continuous improvement opportunities are identified. Notably, the department has already identified connections to other pilot projects, Titans Town, for occupational training and job opportunities. Additional details regarding this pilot project are provided below.

Titans Town

In Fall 2022, the Tennessee Titans released their plans for a new stadium in Nashville, TN. The Nashville stadium is an expansive project, sprawling over approximately 1.85 million square feet. This colossal structure, designed to be the new home for the Titans, will boast concrete and structural steel construction across eight floors, resting on more than 700 concrete piers. With

seating for 60,000 spectators, the venue features a unique, circular ETFE translucent roof system spanning 338,000 square feet with 38-foot spans, ensuring an immersive viewing experience. The stadium's design also includes 44 escalators for facility access and dedicates 12,000 square feet for community events, setting a new standard for multipurpose venues in the heart of Nashville. As imagined, a construction project of this size provides great economic development for the city of Nashville and highlights an almost immediate increase in new workforce needs, especially specific, technical jobs. To support these efforts, the Tennessee Department of Labor and Workforce Development, TOSHA Division, Consultative Services Section, along with Tennessee Builder's Alliance, and any groups of subcontractors, insurers, employees, and/or their representatives performing work at the Tennessee Titans Stadium who wish to participate have entered a historic partnership.

The purpose of this partnership is to have a meaningful and positive impact of an effective safety and health programs which assist the construction manager and their subcontractors in providing a workplace free of conditions which jeopardize employee safety and health with the goal of proactively preventing injuries and illnesses.

Tennessee Department of Labor and Workforce Development, the TOSHA Division, through the efforts of the Consultative Services Section, working with Tennessee Builder's Alliance, support of the partnership and are committed to protecting ALL workers of all contractors and subcontractors, through the following:

- Reducing hazards in the workplace, increasing frontline worker knowledge of these hazards, and reducing worker exposure to hazards
- Implementing an effective, site-specific Safety and Health program management commitment and employee engagement and accountability of both groups, and finally
- Reducing workplace injuries and illnesses through these two steps above. In theory, the active steps of the program should result in strategies to prevent recurrence of hazards and unsafe actions via the development of a safety culture, resulting in the lower injury rates.

Additionally, the Department is supporting the influx of job opportunities and career exploration through support from the Workforce Services Division. The local workforce development board in with the Tennessee Builders Alliance (TBA) has developed a robust workforce development plan to align with the needs of the stadium's construction and emphasizes opportunity for individuals in the promise zones. This plan includes three strategies:

1. Industry specific training for unemployed, underemployed, justice involved, WIOA eligible youth and adults interested in growing a career in construction. This includes a future state- registered pre-apprenticeship program that is currently in development.
2. Incumbent worker training to include short term training and registered apprenticeships for construction trade partners
3. Community engagement and long-range pipeline development through career exploration and other K-12 activities

To ensure operational excellence in the execution of this workforce plan, the Department is working with the local area to secure technical and financial resources which will ensure timely and sustainable delivery of services.

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 and workgroups 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.

- Infrastructure – policy and planning to expand new legislative and funding opportunities, communications, collaborative workforce training (apprenticeship and pre-apprenticeship)

While outside of the traditional committee structure, the SWDB has recently created an additional ad-hoc committee to address emerging and innovative workforce needs across the state. As stated above, state workforce board members were asked to participate in an Infrastructure Work Group (IWG) as a smaller more agile subset of the larger board, especially the Innovations Committee. In alignment new bipartisan legislation passed by the US Congress, the Infrastructure Investment and Jobs Act (IIJA), also known as the Bipartisan Infrastructure Law (BIL) serve as a foundational guide for the tasks and function of this workgroup. In its initial phase, this workgroup will make recommendations on the following:

- policy and planning related to critical workforce pipeline development in key infrastructure sectors in the state such as trades (roads, bridges, etc.), communications (broadband) and environment (wastewater)
- cross collaborative approaches to apprenticeship and pre-apprenticeships related to infrastructure
- workforce funding opportunities at both the federal and state level to support interagency partnerships
- focused outcomes related to workforce training from certificate to degree level credential attainment

As legislation and funding opportunities expand under IIJA, BIL or new acts/laws, the SWDB, especially the IWG will expand its roles and responsibilities.

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

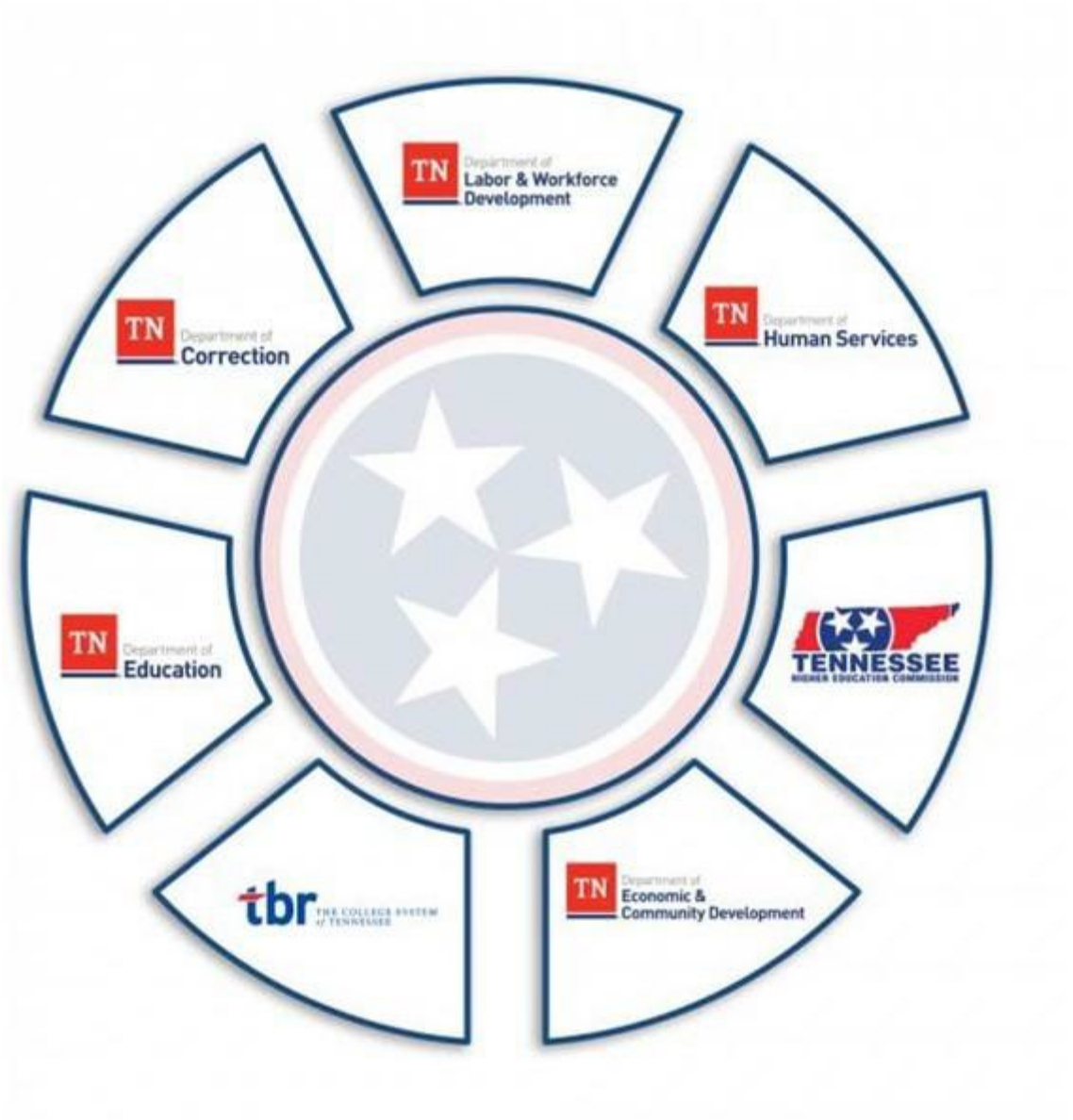
All Tennessee's current policies, guidance, and procedures are designed to ensure that the local development areas and key partners are aligned with the strategic direction of USDOL, the Governor, and the Tennessee Workforce Development Board. Tennessee has fully embraced the key principles of the Workforce 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.



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-12Adult Education
        - Re-Entry
        - Dislocated Worker/Re-Employment (Unemployment Insurance/Workers Comp)
        - Military Transition
        - Post-Secondary

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

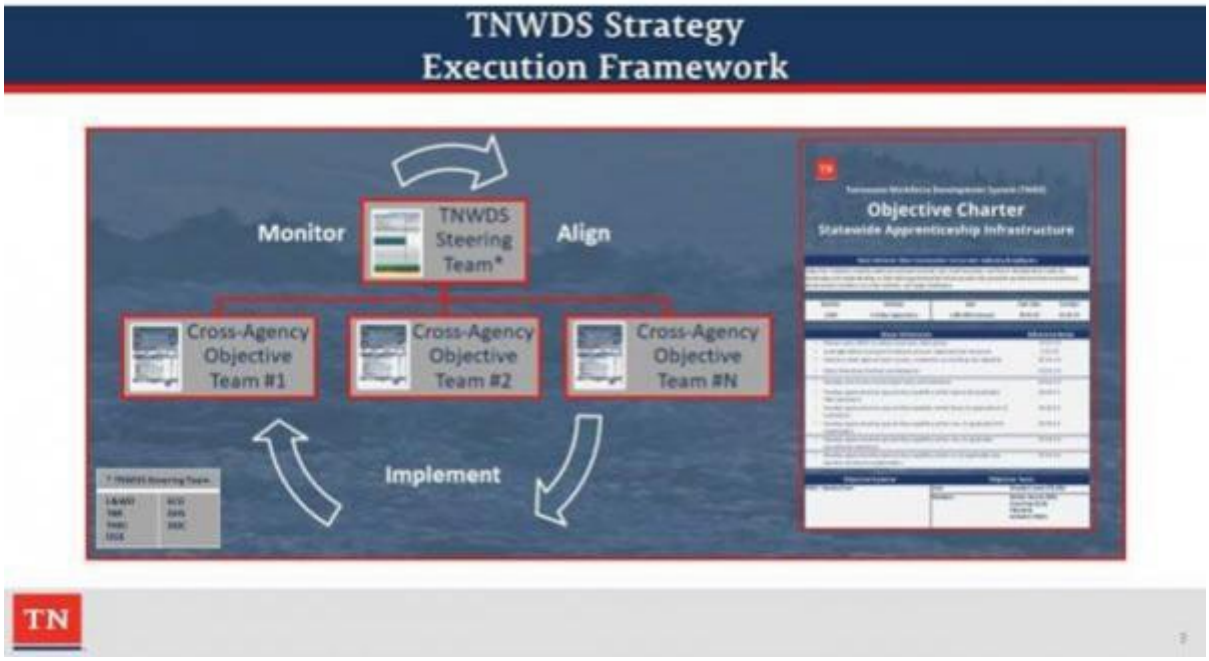
-
    - Cross Agency Incentive Process
    - Cross Agency Project Management Process

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.



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, 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.

Regarding 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 One-Stop Delivery system is critical to our workforce development system across the state. The State Workforce Development Board has adopted policies and/or guidance that drive and support the workforce development system's efforts of developing new and maintaining existing partnerships within the American Job Center Network while ensuring collaboration and alignment of WIOA required and optional one-stop partners. Planning and execution occur at the state, regional, and local levels with all one-stop partner programs to ensure efforts focus on coordination and reducing the duplication of efforts. Planning is supported by the state policies and/or guidance that include but are not limited to addressing co-enrollment efforts with one-stop partner programs, regional and local planning, MOU/One-stop Service Delivery, One-Stop System Design, One-Stop Certifications, all of which address strategic alignment of partner activities.

One-stop partner meetings are held at the local level, usually on a quarterly basis, to address alignment of workforce services provided by all core, required and optional partners participating in the One-Stop Delivery System. The goal is to increase the alignment and coordination with existing partner programs and to introduce any new partner programs and service delivery coordinative efforts. Strategic discussions include ways to maximize service delivery between Comprehensive, Affiliate, and satellite offices as well as access points, with emphasis placed on co-enrollment and coordination with One-stop required and optional program partners. MOUs outlining the services and funding to be provided by workforce system partner are in place which further support the efforts of not duplicating services.

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 at the state level. This vision supports the work that is being completed at the regional and local level. 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 TNDLWD 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 TNDLWD 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 partners 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. 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 most 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. 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 Labor and Workforce Development's Employer Operations Unit leads in the conceptualization and implementation for its statewide business services strategy, however it recognizes that serving employers is a collaborative effort across the entirety of the workforce system. There are multiple offices, units, and roles within the Tennessee Department of Labor and Workforce Development (TDLWD) along with other Tennessee state agencies that play an essential role in the delivery of services to businesses.

- The TDLWD will help ensure interagency collaboration between all partners defined below in helping employers find and retain qualified talent according to WIOA Section 108(b)(4)(B) which outlines business services activities that are intended to promote, market, connect, and provide access to initiatives provided within TDLWD.
    - Employer Operations (TDLWD) includes oversight statewide for business services strategy, employer VOS accounts, field support and Zen Desk tickets, On-the-job and Incumbent Worker Training grants, online training portal, and virtual job fair application.
    - Business and Workforce Directors (TDLWD) positioned in each of the local workforce areas serve as the connecting point between TDLWD and each local workforce board. Business and Workforce Directors have a pulse on labor market trends and assist in identifying employer staffing challenges.
    - WFS Division Program Directors and Grants Managers for employer facing services to include:

        - Apprenticeship TN
        - Work Opportunity Tax Credit
        - Federal Bonding
        - Reentry
        - Local Veterans' Employment Representative
    - One-Stop Service Delivery System and One-Stop Operators (OSO) are charged with enhancing the range and quality of workforce development services available to businesses through a coordinated approach among partner agencies including helping businesses find skilled workers and access other services such as training for their current workforce.
        - American Job Center (AJC) cross functional teams based at each Comprehensive American Job Center (to include affiliates and specialty centers) works under the direction of the OSO through the guidance, and authority of the local workforce board (WIOA 361.430(a)(4)(ii) and (a)(6) Team members vary by LWDA/American Job Center and may include Wagner-Peyser staff (Team Lead, Career Specialist), Local Veterans' Employment Representatives, Adult and Education representatives.
    - LWDA Business Services Staff responsibilities vary by area, but typically include, Rapid Response and Layoff Aversion, local area business engagement and coordination with American Job Center Business Services Team members. (Note, not all 9 local boards have a designated team member to carry out the business services functions.

- In addition to Tennessee Department of Labor and Workforce Development, six other state agencies work in tandem to create a pipeline that can supply a qualified and trained workforce for Tennessee employers. These agencies are:
    - 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 to meet the current and projected workforce needs of employers. 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, Local Veterans' Employment 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.
    - Tennessee Board of Regents
    - Tennessee Department of Corrections

- Tennessee Department of Economic and Community Development
- Tennessee Department of Education
- Tennessee Higher Education Commission

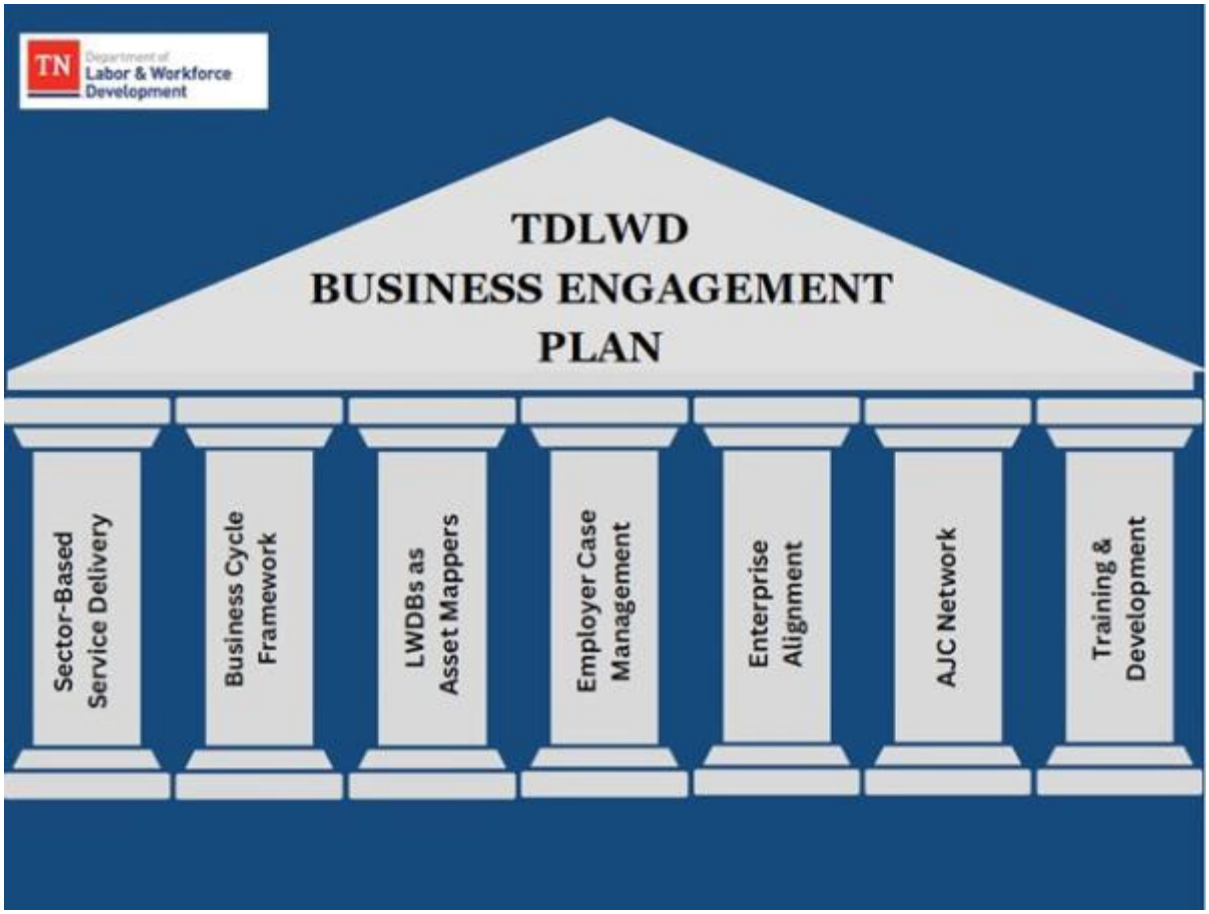
The TDLWD Employer Operations Unit has developed a Business Engagement Plan (BEP) to implement a statewide strategic approach to serving the needs of Tennessee employers.

In FY23, the department developed a Business Engagement Plan to prioritize Tennessee employers as workforce system "customers" by building business consulting relationships, confidently projecting a value proposition, and customizing programs and benefits available. To better serve our employer customer, this infrastructure creates a state-wide business services model for TDLWD staff and external LWDA partners to implement and provide a consistent approach of streamlined solutions. This plan establishes a comprehensive agency-wide mindset redefining "business engagement." Assessment of need and identified high-level solutions have been organized into seven foundational themes called plan "pillars." These seven foundational pillars collectively create the plan structure:

- Adopting a Sector-Based Service Delivery Approach
    - Top industry sectors pursued by the State Workforce System will be based upon current data provided by WIRED. Business and Workforce Directors drive consistent messaging and work with industry partners to develop regional sector strategies and industry partnerships. Regional Planning Councils and LWDBs will collaborate with Business and Workforce Directors to establish and/or participate in, sector-based committees to align with TDLWD identified state sector priorities.
- Utilizing a Business Cycle Framework
    - Utilizing the business cycle framework will provide a comprehensive approach to supporting business engagement across various stages. The business lifecycle encompasses distinct phases: Start-up, Growing, Expansion/Peak, Maturity/Maintenance, Contraction/Transition, and Closure.
- Positioning LWDBs as Asset Mappers
    - Asset mapping will serve as an important step in understanding all the levels of resources that are available and how to braid those resources so the community can leverage, support, and integrate workforce and economic development initiatives. This approach helps bridge the gap between workforce supply and employer demand, ultimately contributing to economic growth and job opportunities in the region.
- Case Managing Employers
    - Case managing employers as customers will involve several essential steps to ensure effective communication with and positive responses from employers. First, efforts will focus on establishing a unified approach to managing business customer relationships via a CRM platform. Second, managing employer relationships through single points of contact will streamline the approach to connecting with employers while helping to reduce the potential of employer fatigue. Lastly, trained staff will work to develop personalized solutions that align with each employer's goals.

- Enterprise Alignment
    - A collaborative effort between internal and external workforce partners will be supported through Business and Workforce Directors, the primary strategy to help align efforts within TDLWD and coordination with external partners in the employer operations space.
- AJC Network Improvements
    - The AJC network will shift its strategies and internal processes to better receive and act upon information from Business and Workforce Directors to help meet employer needs from a service delivery level. To that end, Business Services Teams will be reorganized, roles will be expanded.
- Training & Development
    - TDLWD will implement a comprehensive training plan that supplies materials and development opportunities that address our business engagement culture, concepts, and processes. Outside business experts will train WFS staff on business and industry knowledge, and staff will be cross-trained in business "speak" and projecting a professional image while representing enterprise objectives.

Each of these plan pillars is supported by targeted strategies and specific goals. As part of this blueprint infrastructure for business engagement, strategies and goals are detailed through action items and assigned action owners. Additionally, metrics for success are identified to measure progress. Through these strategies, the department will enhance how we provide customer service to our employers and become better positioned to provide agile responses to workforce system needs.



E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS AND OTHER EDUCATION AND TRAINING PROVIDERS.

Describe how the State's Strategies will engage the State's community colleges, adult education providers, area career and technical education schools, providers on the State's eligible training provider list, and other education and training providers, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv). Include how the State's strategies will enable the State to leverage other Federal, State, and local investments to enhance access to workforce development programs at these institutions.

PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

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.

PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS

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, 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 can 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

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 individuals 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.

F. 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

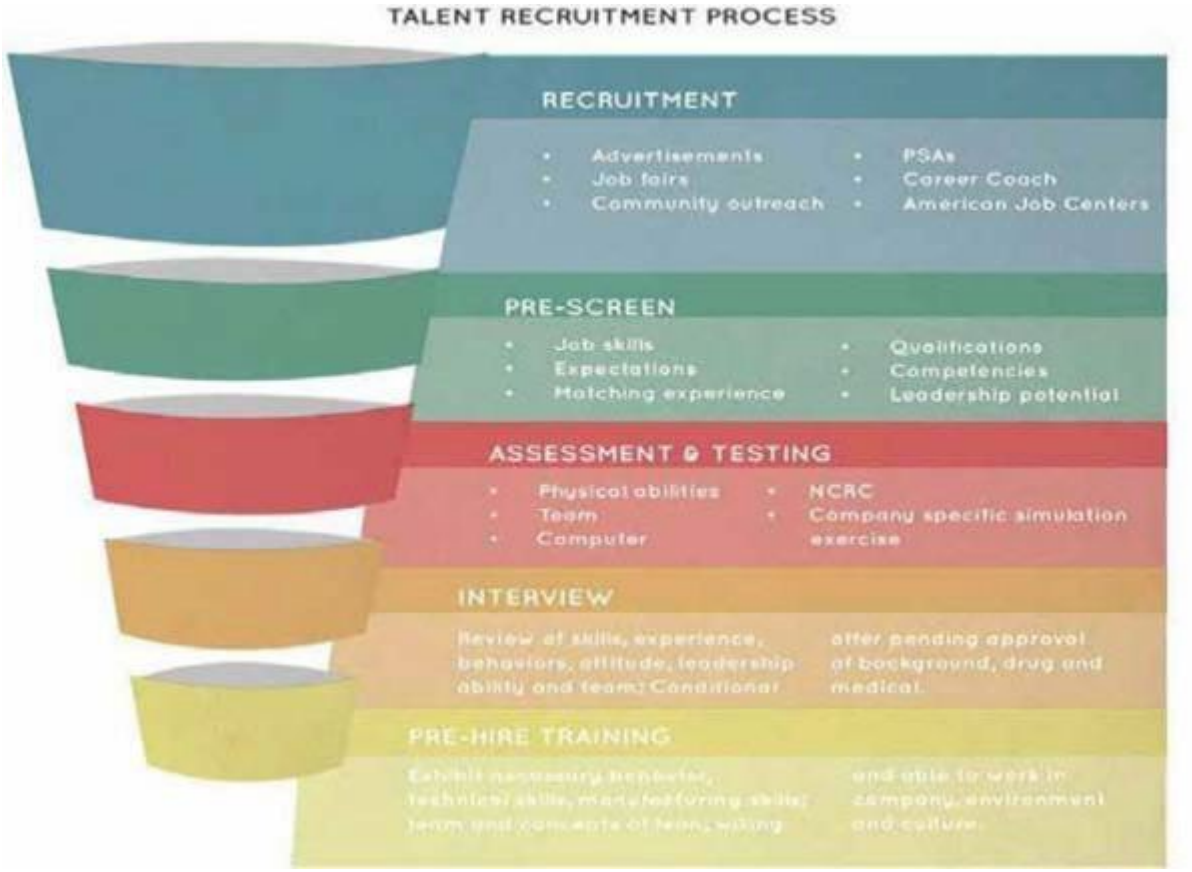
The Pharmacy Technician Area of Study trains students to assist licensed pharmacists in providing medication, medical devices or products, and customer service to patients. Pharmacy Technicians may also perform tasks related to preparing or compounding medications, communicating with physician offices 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.

G. 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:



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—

1. THE STATE OPERATING SYSTEMS THAT WILL SUPPORT COORDINATED IMPLEMENTATION OF STATE STRATEGIES (E.G., LABOR MARKET INFORMATION SYSTEMS, DATA SYSTEMS, COMMUNICATION SYSTEMS, CASE MANAGEMENT SYSTEMS, JOB BANKS, ETC.).

    1. THE STATE OPERATING SYSTEMS THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES. THIS MUST INCLUDE A DESCRIPTION OF–

    1. 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.)

In Tennessee our WIOA required core and combined partners have oversight over multiple data systems that support and help carry out WIOA reporting requirements. We work together as partners sharing data across systems so that we can best provide our services to Tennesseans depending on their needs.

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 (Title 1 WIOA Adult, Dislocated Worker Youth, Title 2 Adult Education, and Title 3 Wagner Peyer, Apprenticeship, TAA, SNAP E&T and JVSG 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:

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- 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:

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- 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 Title IV (TDHS) – Vocational Rehabilitation (VR) is under contract with Alliance Enterprises, Inc. and has replaced their new system, Aware, that is federally compliant and supports the changes required by WIOA. The new system is providing 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 Tennessee Department of Human Services – Temporary Assistance for Needy Families has recently launched a new case management called EBMS in 2023. This new system has allowed better case management for participants and allowed better sharing data for other systems.

2. 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.10

1. 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 for Title I, II and III using a 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 (FOR EXAMPLE. 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 AND ANY ADDITIONAL GUIDANCE FOR ONE-STOP PARTNER CONTRIBUTIONS.

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 WIOA Technical Assistance (tn.gov)

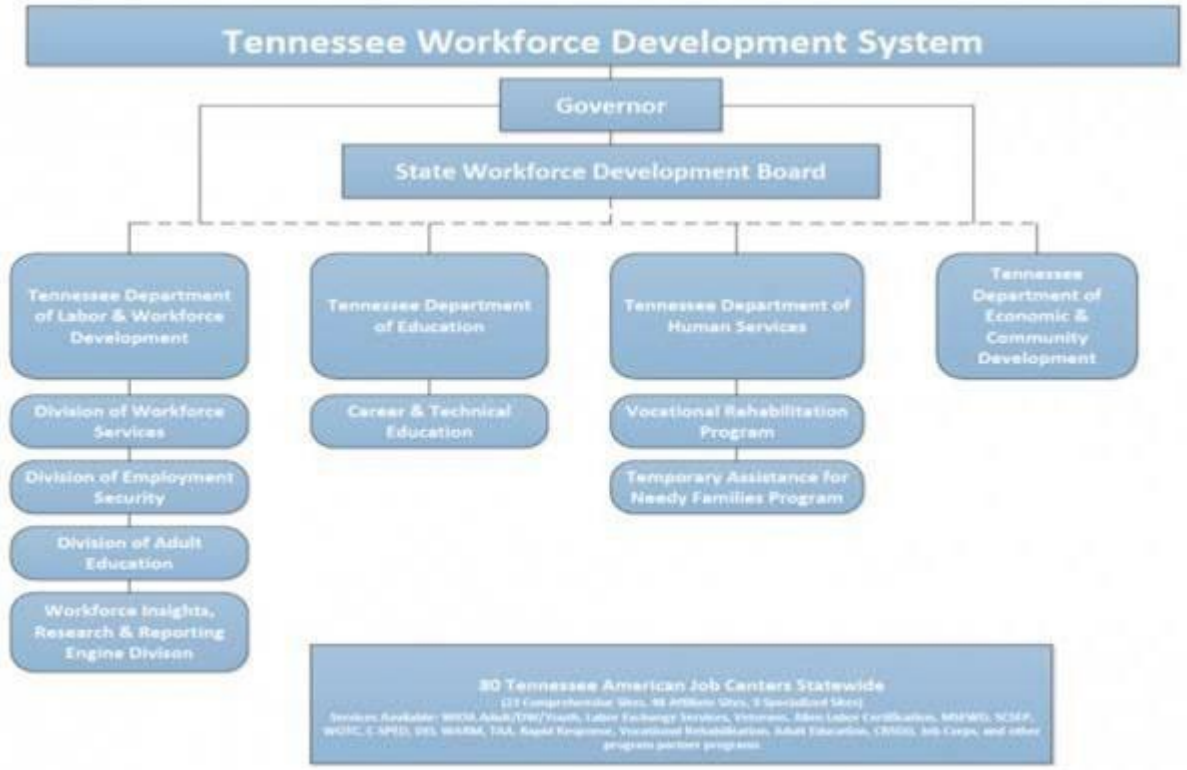
To address the handling of One-Stop partners' contributions the state has a policy labeled One-StopInfrastructure Governor's Guidance and guidance developed on the creation of local IFAs

and MOUs labeled MOU/One Stop Service Delivery and Infrastructure Funding Agreement. These policies can be located at WIOA Technical Assistance (tn.gov)

3. STATE PROGRAM AND STATE BOARD OVERVIEW

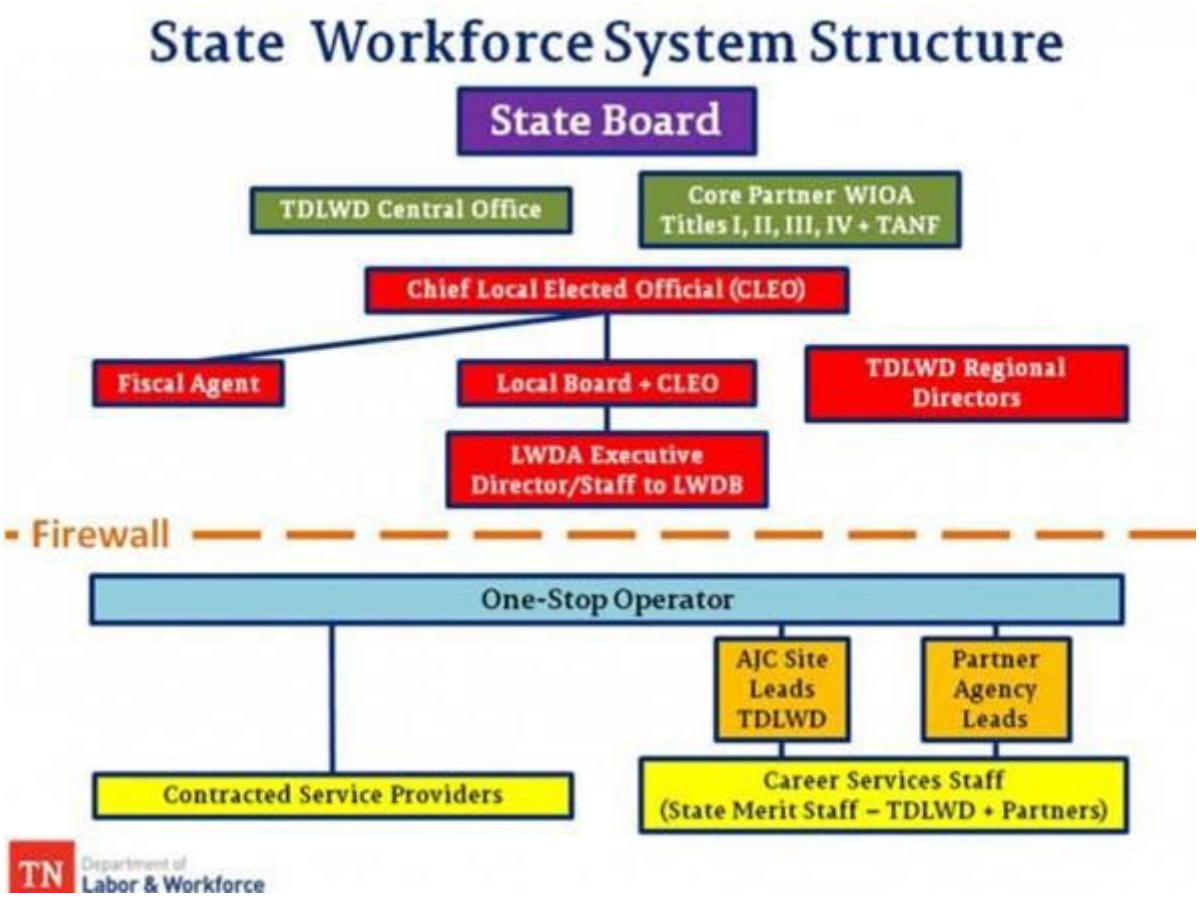
A. STATE AGENCY ORGANIZATION

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.



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 32 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.



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 activities that will assist State Board members and staff in carrying out State Board functions effectively. Also, provide a membership roster for the State Board consistent with 20 CFR 679.110-120, including members' organizational affiliations and position titles.

Under the oversight and direction of Governor Bill Lee, the Tennessee State Workforce Development Board is comprised of 32 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.

Board Member Name	Employer or Organization of Board Member	Special Requirement	Total % of Board	Board Numbers
Governor		WIOA Section 101(b)(1)(A)		

Board Member Name	Employer or Organization of Board Member	Special Requirement	Total % of Board	Board Numbers
Michael Hendrix	Tennessee State Government	**Governor's Designee**		**1**
Representatives of Business		WIOA Section 101(b)(1)(C)(i)		
Natalie Alvarez	Solyco Capital	Business		1
Martha Axford	ABC Design, LLC	Business		1
Joe Baker	Ole Smokey Distillery	Business		
Tim Berry	Herschend Enterprises	Business		1
Lynda Botsch	Rocket City HR Consulting	Business		
Michelle Falcon	Aegis Sciences Corporation	Business		1
Ben Ferguson	Personnel Placements Holdings, Inc.	Business		1
Bill Godwin	BACAR Constructors, Inc.	Business		1
Marshall Graves	Stone Door Group	Business		1
J. Paul Jackson	Thor Boats	Business		1
Stuart Price	Lee Company	Business		1
Jason Schmitt	Old Time Pottery	Business		1
Ruste Via	Christian Family Medicine and Pediatrics	Business		1
Vacant		Business		
Vacant		Business		
Vacant		Business		

Board Member Name	Employer or Organization of Board Member	Special Requirement	Total % of Board	Board Numbers
		Business Total This must be the majority.	**52%**	**16**
Representatives of Workforce		WIOA Section 101(b)(1)(C)(ii)		
Jason Bates	Toyota Bodine Aluminum, Inc.	Apprenticeship/ Training		1
Billy Dycus	TN AFL-CIO/AFL-CIO	Organized Labor		1
Jeffrey Vance	Bridgestone	Organized Labor		1
Kevin Vaughn	FirePro LLC	Apprenticeship/ Training		1
Ronald Wade	HopeWorks	Community Based Organization		1
Vacant		Workforce		1
		Workforce Total This must be at least 20%	**21%**	**6**
Representatives of State Legislature		WIOA Section 101(b)(1)(B)		

Board Member Name	Employer or Organization of Board Member	Special Requirement	Total % of Board	Board Numbers
State Representative Clark Boyd	Tennessee State Government	State Representative		1
State Senator Paul Bailey	Tennessee State Government	State Representative		1
		State Legislature Total		**2**
Representatives of Government		WIOA Section 101(b)(1)(C)(iii)		
Deniece Thomas	Tennessee Department of Labor and Workforce Development	Labor & Workforce Development Titles I and III	*State Agency Official/*	1
Jay Baker	Tennessee Department of Labor and Workforce Development	Adult Education Title II	*State Agency Official/Partner*	1
Kevin R. Wright	Tennessee Department of Human Services	Vocational Rehabilitation Title IV	*State Agency Official/Partner*	1
Stuart McWhorter	Tennessee Department of Economic and Community Development	Economic & Community Development	*State Agency Official/Partner*	1
Lizette Reynolds	Tennessee Department of Education	Education (Perkins)	*State Agency Official/Partner*	1
Clarence Carter	Tennessee Department of Human Services	Human Services (TANF and SNAP)	*State Agency Official/Partner*	1
Mayor Tim Kelly	Chattanooga, TN	Chief Elected Official - City		1

Board Member Name	Employer or Organization of Board Member	Special Requirement	Total % of Board	Board Numbers
Mayor Mike Pogreba	Humphreys County, TN	Chief Elected Official - County		1
		Government Total	**28%**	**8**
			Grand Total:	**34**

Table 22: Revised Tennessee State Workforce Development Board Membership Roster

Per feedback from the Federal Panel, our board roster has been revised to comply with the WIOA statute and regulations.

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 AND ONE-STOP PROGRAM PARTNER PROGRAMS.

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. 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. 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.

1. 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 (WIR2ED) 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.

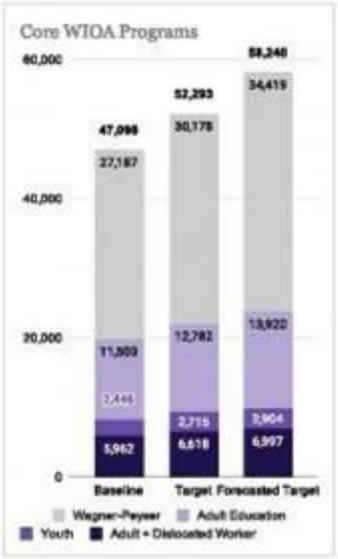
Additionally, each state VR agency is required to perform a comprehensive statewide needs assessment (CSNA) every three years. The CSNA is required as part of the Rehabilitation Act of 1973 as amended by the Workforce Innovation and Opportunities Act (WIOA). The CSNA serves as the basis for state plan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

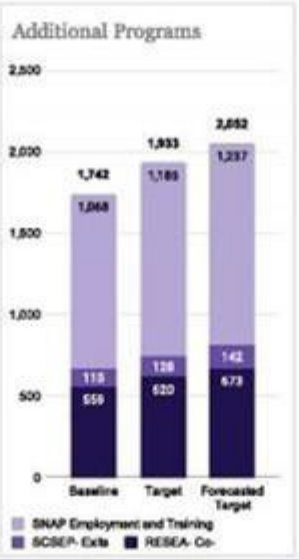
2. ASSESSMENT OF ONE-STOP PARTNER PROGRAMS

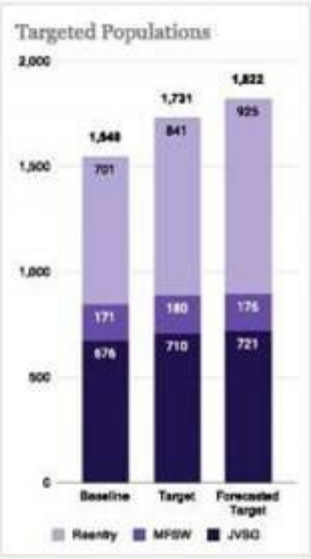
Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. Such state assessments should take into account local and regional planning goals.

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.)





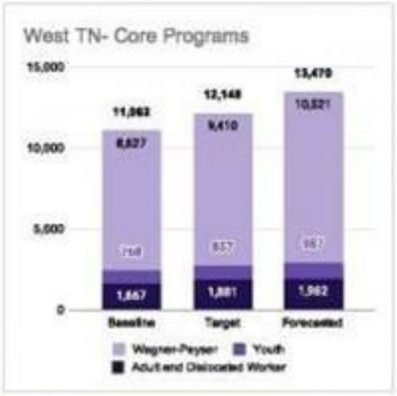


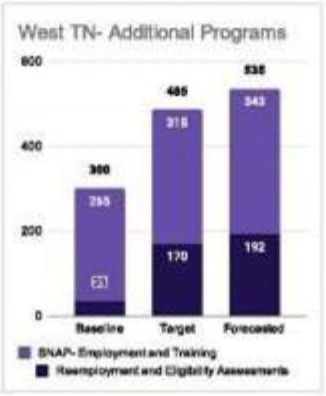
Core Programs	Target	Baseline	Forecasted Target	Measure	Geography	Historical Trend
WIOA Title I- **Adult and Dislocated Worker**	6,618	5,962	6,997	New Enrollment	Region	↓
Youth	2,715	2,446	2,904	New Enrollment	Region	—
WIOA Title II- **Adult Education**	12,782	11,503	13,920	New Enrollment	Provider	↓
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	↓

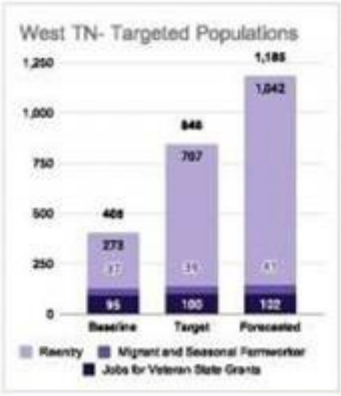
Additional Programs	Target	Baseline	Forecasted Target	Measure	Geography	Historical Trend
Reemployment and Eligibility Assessments	738	559	819	Co-Enrollment	Region	↓
Senior Community Service Employment Program	128	115	142	Exits	Provider	↓
SNAP- Employment and Training	1,499	1,350	1,581	New Enrollment	Region	↑
Trade Adjustment Assistance	34.8%	19.6%	50.0%	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	175	New Enrollment	Region	↓
Reentry	2,000	701	3,000	New Enrollment	Region	↑

1



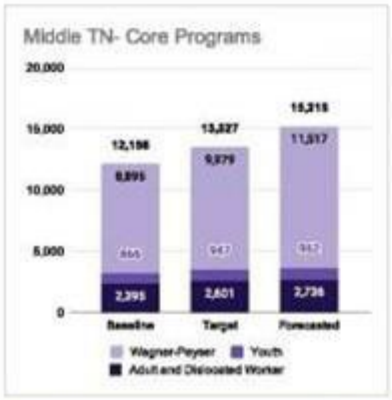


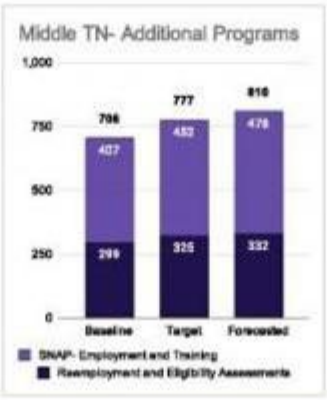


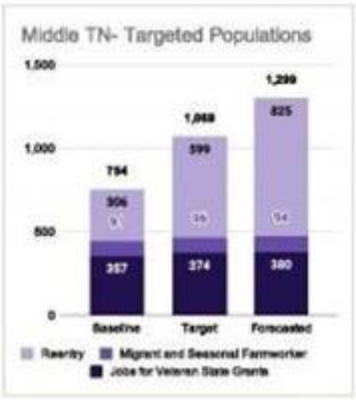
Core Programs	Baseline	Target	Forecasted Target	Measure	Methodology	Historical Trend
Adult and Dislocated Worker	1,667	1,881	1,962	New Enrollment	Regional Baseline + (State Increase x proportion of allocation)	—
Youth	768	857	987	New Enrollment	Regional Baseline + (State Increase x proportion of allocation)	↓
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 UI Claimants Selected	↓
Senior Community Service Employment Program	NA	NA	NA	NA	Provider Specific	NA
SNAP- Employment and Training	265	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)	↑



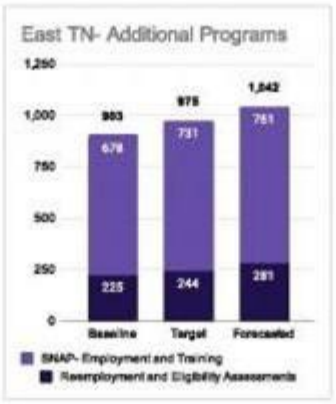


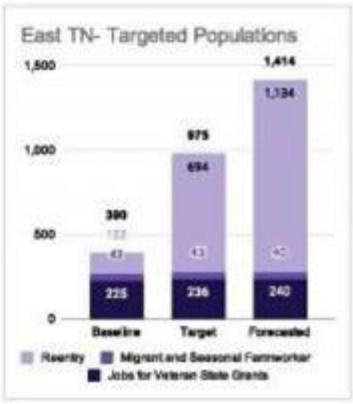


Core Programs	Baseline	Target	Forecasted Target	Measure	Methodology	Historical Trend
Adult and Dislocated Worker	2,295	2,601	2,736	New Enrollment	Regional Baseline + (State Increase x proportion of allocation)	↓
Youth	866	947	962	New Enrollment	Regional Baseline + (State Increase x proportion of allocation)	↑
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 + (1% increase x Proportion of UI Claimants Selected)	↓
Senior Community Service Employment Program	NA	NA	NA	NA	Provider Specific	NA
SNAP- Employment and Training	407	452	478	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	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	399	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	9,665	10,788	12,381	New Enrollment	Regional Baseline + (State Increase x proportion of working poor)	↓
Vocational Rehabilitation	2,050	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%	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	225	236	240	New Enrollment	Regional Baseline + (State Increase x proportion of staff)	↑
Migrant and Seasonal Farmworker	43	43	40	New Enrollment	Regional Baseline + (Regional Baseline x State targeted growth rate)	↓
Reentry	122	694	1,134	New Enrollment	Regional Baseline + (State Increase x Relative Potential to Serve)	↑

4

The 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.

As an extension of the evaluation process, the SWDB has recently begun its Board Excellence Certification Program. This program is an integrated system of assessment, feedback, and professional development and is designed to foster and sustain high performing workforce development boards and facilitate effectiveness and innovation in meeting their obligations and leading into the future. Boards that achieve Board Excellence Certification serve as role models of improvement, innovation, and excellence for the rest of the workforce organization.

What is the benefit of the Board Excellence Certification Program?

Achieving Board Excellence Certification acknowledges reliable approaches that lead to many areas of value:

• Creates systematic processes & identifies essential skills.

• Demonstrates credibility & commitment to excellence.

• Ensures legal responsibilities of the boards are integrated into board operations.

• Promotes accountability.

• Recognizes competence and expertise.

• Prepares board for possible new grant funding opportunities.

What is the Board Excellence Certification Program?

The Program foundation is a set of Elements of Certification that serve as the body of knowledge based on the Baldrige Framework for Excellence criteria and the Workforce Innovation and Opportunity Act (P.L. 113-128). The Elements of Certification address board operations and responsibilities in these key areas:

• Board structure, roles, relationships*

• Board and board member responsibilities*

• Governance system**

• Strategic Insight**

• Performance Management**

• Customer & Partner Engagement**

*Source: Board bylaws, charter, WIOA requirements

***Source: Baldrige Framework for Performance Excellence*

The Elements of Certification serve as the body of knowledge for high performing boards. For each element, there are Standards. These Standards are specific to each Element of Certification and identify actions critical to achievement of certification elements. They serve as the basis for the assessment of board performance.

For each Standard, there are incremental Levels of Competence to be demonstrated. These Levels of Competence range from having a process in place, following the process consistently, evaluation the process for effectiveness, to demonstrating the process is effective via measurable results. The Levels of Competence serve as the basis for feedback to the Board that identifies areas of strength, and opportunities for improvement and professional development.

A designation of overall Level of Achievement is determined, taking into account all elements, standards, and levels of competence. There are three Levels of Achievement:

- Compliant: Practices are in place, accessible, and known by those responsible for their execution.
- Competent: Practices are systematic and consistently followed. Practices are often reviewed, and some indicators or measures are identified.
- Role Model: Practices are evaluated for effectiveness. Practices are determined to be effective.

How does the Board Excellence Certification Program work?

1. Certification examiners review information supplied by board and WSD that demonstrates competence based on Standards.

2. Certification examiners prepare the Certification Assessment Report, including proposed levels of achievement for each Element.

3. Certification review team recommends Certification Level and approves assessment report.

4. The board celebrates Certification Level, analyzes reports, and identifies priorities for improvement.

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. PREVIOUS ASSESSMENT RESULTS

For each four-year state plan and state plan modification, 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), in accordance with methods described in 4(A). Describe how the State is adapting its strategies based on these assessments.

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.

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.

Beginning in August 2023 the Tennessee Department of Labor and Workforce Development (TDLWD), in partnership with a third party, evaluated the state workforce system and supporting infrastructure for the American Job Center (AJC) and Adult Education (AE) network to identify leading practices, service gaps, and opportunities for improvement. The findings and insights from this effort will help TDLWD shape how it delivers essential workforce services across the State. This includes improvements to the overall customer experience and strategies to strengthen the implementation of reforms introduced by WIOA.

To complete the evaluation, the State leveraged multiple data instruments to gather input from key stakeholders who interact with the State's workforce ecosystem, including staff, business partners, workforce leaders, employers, and residents. The evaluation team assessed the customer experience of employers and job seekers by analyzing program-level data and conducting stakeholder interviews, a workforce assessment workshop, online focus groups, open surveys, and mystery shopping visits. This range of data collection methods provided a holistic view of the existing job placement services, training programs offered, and the populations served. Using the information from these efforts, the evaluation team recommended program and management strategies to improve service delivery and outcomes for job seekers and employers.

The State's research and data analysis goals are to determine which existing workforce services are effective, highlight current gaps in service delivery, and identify services that may no longer be impactful. The outcomes of this evaluation offer recommendations that incorporate local, statewide, and national best practices. As a result, the AJC network and AE program will be positioned to consistently support job seekers and employers, encourage flexibility and innovation, and quickly pivot to meet local or statewide workforce development needs. There were six strategies as recommendations to help tackle the challenges uncovered by the most recent analysis to enhance the State's WIOA and Title II services. TDLWD is currently reviewing these recommendations and determining next steps for implementation, review and continuous improvement.

The six recommendations are as follows:

1. Strengthen service integration and increase co-enrollment

2. increase service utilization and awareness among all communities

3. Design and provide intensive, individualized services to enhance employment outcomes

4. Identify causes and missing leading practices to enhance efficiency

5. Deepen and track community partnerships and increase access points to customers

6. Focus on staff development, knowledge transferring and cultural change

Notably, services for vocational rehabilitation were not included in the most recent assessment however initial conversation are currently in development for a phase II evaluation. In the meantime, 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 and overall program performance. 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.

C. EVALUATION

Describe how the State will conduct evaluations and research projects of activities carried out in the State 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 (WIOA Section 116(e)).

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; 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;
5. 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)

TN Allocation Formula for WIOA Youth, Adult and Dislocated Worker Programs

WIOA Youth Activities in Accordance with WIOA Section 128(B)(2) or (B)(3)

Formula:

1/3: Local area relative share of total unemployed in areas of substantial unemployment (ASU) (average 12 months ending 6/30) 1/3: Local area relative share of excess unemployed (average 12 months ending 6/30)

1/3: Local area relative share of disadvantaged youth. A youth aged 16-21 whose income, or whose family income was below the poverty level or below 70% of the poverty lower living standard. (American Community Survey 2016-2020)

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.

LWDA	Youth	Adult	Dislocated Worker	TOTAL
NE	$826,025.29	$832,931.93	$599,656.62	$2,258,613.84
ET	$1,698,466.60	$1,680,959.44	$1,705,087.60	$5,084,513.64
SE	$1,062,118.13	$1,011,275.55	$1,246,882.69	$3,320,276.37
SM	$669,851.09	$696,764.42	$702,713.47	$2,069,328.98
UC	$563,813.57	$581,607.51	$430,209.64	$1,575,630.71
NM	$2,510,336.98	$2,414,840.44	$2,914,669.11	$7,839,846.53
SW	$514,724.81	$520,076.02	$356,251.49	$1,391,052.31
NW	$531,546.34	$538,968.22	$379,128.59	$1,449,643.15
GM	$3,640,902.19	$3,498,148.47	$2,251,702.79	$9,390,753.46
TOTAL	**$12,017,785.00**	**$11,775,572.00**	**$10,586,302.00**	**$34,379,659.00**
Regional PY 2023-2024 Allocations				
East	$3,586,610.02	$3,525,166.92	$3,551,626.91	$10,663,403.85
Middle	$3,744,001.64	$3,693,212.37	$4,047,592.22	$11,484,806.23
West	$4,687,173.34	$4,557,192.71	$2,987,082.87	$12,231,448.92

Table: Program Year (PY) 2023 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)

TN Allocation Formula for WIOA Youth, Adult and Dislocated Worker Programs

WIOA Youth Activities in Accordance with WIOA Section 128(B)(2) or (B)(3)

Formula:

1/3: Local area relative share of total unemployed in areas of substantial unemployment (ASU) (average 12 months ending 6/30) 1/3: Local area relative share of excess unemployed (average 12 months ending 6/30)

1/3: Local area relative share of disadvantaged youth. A youth aged 16-21 whose income, or whose family income was below the poverty level or below 70% of the poverty lower living standard. (American Community Survey 2016-2020)

WIOA Adult Activities in Accordance with WIOA Section 133(B)(2) or (B)(3)

Same as Youth Activities, except Formula uses disadvantaged ADULTS instead of YOUTH. An adult aged 22-72 whose income, or whose family income was below the poverty level or below 70% of 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.

LWDA	Youth	Adult	Dislocated Worker	TOTAL
NE	$826,025.29	$832,931.93	$599,656.62	$2,258,613.84
ET	$1,698,466.60	$1,680,959.44	$1,705,087.60	$5,084,513.64
SE	$1,062,118.13	$1,011,275.55	$1,246,882.69	$3,320,276.37
SM	$669,851.09	$696,764.42	$702,713.47	$2,069,328.98
UC	$563,813.57	$581,607.51	$430,209.64	$1,575,630.71
NM	$2,510,336.98	$2,414,840.44	$2,914,669.11	$7,839,846.53
SW	$514,724.81	$520,076.02	$356,251.49	$1,391,052.31
NW	$531,546.34	$538,968.22	$379,128.59	$1,449,643.15
GM	$3,640,902.19	$3,498,148.47	$2,251,702.79	$9,390,753.46
TOTAL	**$12,017,785.00**	**$11,775,572.00**	**$10,586,302.00**	**$34,379,659.00**
Regional PY 2023-2024 Allocations				
East	$3,586,610.02	$3,525,166.92	$3,551,626.91	$10,663,403.85
Middle	$3,744,001.64	$3,693,212.37	$4,047,592.22	$11,484,806.23
West	$4,687,173.34	$4,557,192.71	$2,987,082.87	$12,231,448.92

Table: Program Year (PY) 2023 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

WIOA Dislocated Workers in Accordance with WIOA Section 133 (B)(2) and Based on Data and Weights Assigned

Formula:

Funds to local areas must be allocated based on a formula created by the Governor using the following 6 data factors:

- Insured unemployment data; 33%
- Unemployment concentrations; 33%

- Plant closing and mass layoff data; 3%
- Declining industries data; 14%
- Long-term unemployment data; 17%

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.

LWDA	Youth	Adult	Dislocated Worker	TOTAL
NE	$826,025.29	$832,931.93	$599,656.62	$2,258,613.84
ET	$1,698,466.60	$1,680,959.44	$1,705,087.60	$5,084,513.64
SE	$1,062,118.13	$1,011,275.55	$1,246,882.69	$3,320,276.37
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UC	$563,813.57	$581,607.51	$430,209.64	$1,575,630.71
NM	$2,510,336.98	$2,414,840.44	$2,914,669.11	$7,839,846.53
SW	$514,724.81	$520,076.02	$356,251.49	$1,391,052.31
NW	$531,546.34	$538,968.22	$379,128.59	$1,449,643.15
GM	$3,640,902.19	$3,498,148.47	$2,251,702.79	$9,390,753.46
TOTAL	**$12,017,785.00**	**$11,775,572.00**	**$10,586,302.00**	**$34,379,659.00**

Regional PY 2023-2024 Allocations

East	$3,586,610.02	$3,525,166.92	$3,551,626.91	$10,663,403.85
Middle	$3,744,001.64	$3,693,212.37	$4,047,592.22	$11,484,806.23
West	$4,687,173.34	$4,557,192.71	$2,987,082.87	$12,231,448.92

Program Year (PY) 2023 WIOA Title I Adult, Dislocated Worker and Youth Activities Program Allotments

B. FOR TITLE II

I. DESCRIBE THE METHODS AND FACTORS THE ELIGIBLE AGENCY WILL USE TO DISTRIBUTE TITLE II FUNDS.

In program years 2024-25 through 2026-27, TDLWD will distribute WIOA Title II funds in alignment with the methodology established in its 2023 grant competition and subsequent 2023-24 program year. The 2023 competition was designed to ensure statewide coverage of Adult Basic Education services (i.e., awarding local providers to cover all 95 counties). It was also designed to award Integrated English Literacy and Civics Education grants (which are far more limited in funds) to the state's five metro areas with the largest population of immigrants. The 2023 competition resulted in 17 funded local AE providers. Applicants were encouraged to propose funding amounts based on the potential-to-serve population of their proposed service area (by county), as established by annual census data (American Community Survey). The specic data we used, and will use in the coming years, include 5-Year Estimate Data for "Sex by

Age by Nativity and Citizenship Status" (includes individuals aged 18 years and over identifying as non-U.S. citizens), and 5-Year Estimate Data for "Educational Attainment" (includes individuals aged 18-64 without a high school diploma).

TDLWD will determine each year's total budget for local grants based on the Federal award from the U.S. Department of Education and funds appropriated for Adult Education in the Tennessee state budget. We will budget at least 82.5% of its Federal award for Adult Basic Education local grants, in accordance with WIOA Section 222. We plan to budget 100% of the Federal award for Integrated English Literacy and Civics Education (WIOA Section 243 funds) for local grants. We will allocate the funding to the 17 local providers largely in alignment with the amounts awarded in the 2023-24 year, with slight adjustments made each subsequent year based on the prior year's local provider performance and spending.

In the spring of 2027, TDLWD will conduct another grant competition to determine local providers and associated grants for subsequent years. We anticipate using similar methodology to what was used for the 2023 competition.

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.

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.

Describe data-collection and reporting processes used for all programs and activities, including the State's process to collect and report data on co-enrollment, and for those present in the one-stop centers.

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

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    - 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- Peyser, 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.

While all of the aforementioned systems remain in use, the department has recently entered a request for proposal process for new, transformed data and case management system. The review of system requirements and features is currently in progress with project completion and the launch of the new system are scheduled to be completed by Q1 FY25.

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 Governors 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 in included in the response to question 1 in this section.

IV. DESCRIBE THE STATE’S DATA SYSTEMS AND PROCEDURES TO 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 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 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 statue 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.

A. DESCRIBE HOW THE STATE WILL IMPLEMENT THE PRIORITY OF SERVICE PROVISIONS FOR COVERED PERSONS 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.

B. DESCRIBE HOW THE STATE WILL MONITOR PRIORITY OF SERVICE PROVISIONS FOR VETERANS.

C. DESCRIBE THE TRIAGE AND REFERRAL PROCESS FOR ELIGIBLE VETERANS AND OTHER POPULATIONS DETERMINED ELIGIBLE TO RECEIVE SERVICES FROM THE JOBS FOR VETERANS STATE GRANTS (JVSG) PROGRAM'S DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALIST/CONSOLIDATED POSITION.

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 is a person who has served at least one (1) day of active duty in the military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2). Active service includes full-time Federal service in the National Guard or a Reserve component. This definition of "active service" does not include full-time duty performed strictly for training purposes.

2. Eligible Spouse as defined at section 2(a) of the JVA (38 U.S.C. 4215[a]) means 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 the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:

i. Missing in action;

ii. Captured in line of duty by hostile force; or

iii. Forcibly detained or interned in line of duty by a foreign government or power;

c. Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or

d. Any veteran who died while a disability was in existence. A spouse whose eligibility is derived from a living veteran or service member (i.e., categories b. or c. above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

POS is defined as:

- The right to take precedence over non-covered persons –taking precedence may mean:
    - Covered person gains access to services or resources earlier or instead of non-covered persons
    - Priority of Service applies to every qualified job training program funded, in whole or in part, by the Department of Labor

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 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.

Tennessee has developed a standardized process for referring veterans and other eligible persons with significant barriers to employment (SBE) to a DVOP. This triage approach begins at the point of entry into the American Job Center (AJC). Triage is conducted either in-person or telephonically by front desk (intake) staff asking a series of questions to determine eligibility for the various AJC programs, SBEs, and services desired. Tennessee also offers assistance through a virtual AJC where veterans and eligible persons can identify what services are needed, and the system will match them with the appropriate AJC partner.

As part of the triage process, customers are asked if they have served in the military. If they answer "YES" to the question, the veteran/eligible person is given a copy of the most current approved "Eligibility Triage Form" (ETF), with instructions on how to complete the form and return it to the intake person. The intake person will review the form and assess the questionnaire responses.

Veterans and eligible persons who are identified as having a SBE through the initial intake process at the AJC, and need specific Individualized Career Services, may be referred to, and depending upon the visit reason, the appropriate Wagner Peyser, DVOP/ Consolidated Position (CP) staff for assistance as required.

In the absence of DVOP staff, or if the Veteran/eligible person does not meet the criteria for DVOP services, the Team Lead, or other Wagner-Peyser 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.

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.) regarding 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, Brailed 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 Brailed 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. Describe how English language learners will be made aware of the opportunity to enroll and/or co-enroll in all the core programs for which they are eligible.

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 an 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.

Joint planning and coordination, when applicable, are a part of normal business practices for core programs. Details regarding program-specific coordination is provided in the following sections for core programs. The State Workforce Development Board continues to provide strategic oversight and governance for the core programs while the leadership teams at the Tennessee Department of Labor and Workforce Development and the Tennessee Department of Human Services provide operational oversight and continuity of services in alignment with the respective program parameters and SWDB's strategy.

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 administrating 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;	Yes

The State Plan must include	Include
(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;	
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
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	Yes

The State Plan must include	Include
delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	

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

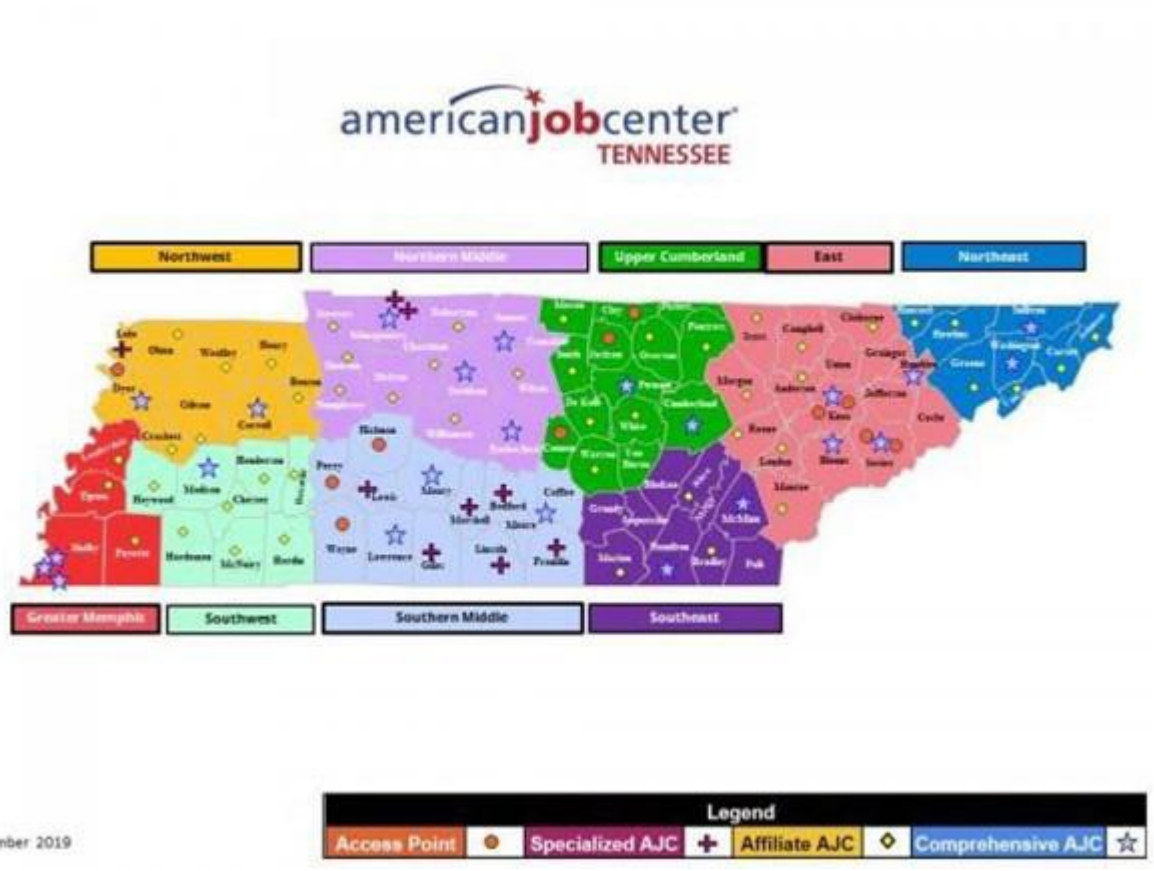
The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B—

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 as identified in State Workforce Development Board Policy- One-Stop System Design. 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.



B. DESCRIBE THE PROCESS AND POLICY 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 to better align their resources with Tennessee's Economic Development regions.

During the time from February 2018 up to the SWDB quarterly meeting on May 11, 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 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 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.

Workforce Services publishes a monitoring guide annually that describes the monitoring procedures to determine LWDB performance and fiscal integrity. That monitoring guide is posted on the State Workforce Development Board policy website: https://www.tn.gov/workforce/contact-the-department0/boards---commissions/boards---commissions-redirect/state-workforce-development-board/wioatechnicalassistance.html. The current year monitoring guide is located at: https://www.tn.gov/content/dam/tn/workforce/documents/wfs/2023-2024-WFS-Monitoring-Guide.pdf.

Each area is assessed annually for both programmatic and fiscal integrity to determine that the Local Workforce Development Areas area performing the required responsibilities within compliance. Any activities that are not in compliance are addressed through corrective action. If any actions are considered egregious, then further sanctions are applied as identified in the State Workforce Development Board Policy - Sanctions for Failure to Meet Federal and State Standards. The following link is to the referenced sanctions policy: https://www.tn.gov/content/dam/tn/workforce/documents/ProgramManagement/WFS_Policy-Sanctions_for_Failure_to_Meet_Federal_and_State_Standards-08-27-2021_s.pdf

The letter below was signed by Governor Bill Haslam on May 24, 2018 to realign the LWDAs.

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

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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 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

C. PROVIDE THE APPEALS PROCESS AND POLICY 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

The State Workforce Development Board (SWDB) has created a process to appeal decisions made by the SWDB through the State Workforce Development Board Policy- Sanctions for Failure to Meet Federal and State Standards. This policy describes the process to appeal decisions to the SWDB as well as appeal processes to the Secretary for the US Department of Labor. That policy and process can be located at: https://www.tn.gov/content/dam/tn/workforce/documents/ProgramManagement/WFS_Policy-Sanctions_for_Failure_to_Meet_Federal_and_State_Standards-08-27-2021_s.pdf

Note: This sanctions policy is currently under revision and will be approved by Quarter 4 of the 2024 Calendar Year.

D. PROVIDE THE APPEALS PROCESS AND POLICY REFERRED TO IN SECTION 121(H)(2)(E) OF WIOA RELATING TO DETERMINATIONS FOR INFRASTRUCTURE FUNDING

The One-Stop Infrastructure Governor's Guidance describes the appeals process for Infrastructure Funding as follows:

1. The Governor, through assistance of the State Workforce Development Board, will make the final determination of each required partner's proportionate share of statewide infrastructure costs under the State funding mechanism.
2. Any required partner may appeal the Governor's determination on the basis of a claim that:

a. The Governor's determination is inconsistent with the proportionate share requirements of 20 CFR 678.735(a) or;

b. The Governor's determination is inconsistent with the cost contribution caps described in 20 CFR 678.735(c) and 678.738.

3. 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.

4. An appeal must be made within 21 days of the Governor's determination and must be submitted formally, in writing, by registered mail no later than the 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, guidance, 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/contact-the-department0/boards---commissions/boards---commissions-redirect/state-workforce-development-board/wioatechnicalassistance.html

B. DESCRIBE HOW THE STATE INTENDS TO USE GOVERNOR'S SET ASIDE FUNDING FOR MANDATORY AND DISCRETIONARY ACTIVITIES, INCLUDING HOW THE STATE WILL CONDUCT EVALUATIONS OF TITLE I ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES.

The majority of the WIOA 15 percent set-aside supports Economic and Community Development employer initiatives, as well as:

- Consolidated Business Grants – supporting work based learning (OJT, IWT, Apprenticeship, Customized Training, etc.)
- Youth Initiatives – Summer Youth Employment Programs
- Monitoring and Single Audit Reviews
- Program Evaluations – KPMG TN workforce development evaluation. The Tennessee Department of Labor and Workforce Development (TDLWD), in partnership with KPMG LLP, evaluated the state workforce system and supporting infrastructure for the American Job Center (AJC) and Adult Education (AE) network to identify leading practices, service gaps, and opportunities for improvement. The findings and insights from this effort will help TDLWD shape how it delivers essential workforce services across the State of Tennessee (the State). This includes improvements to the overall customer experience and strategies to strengthen the implementation of reforms introduced by the Workforce Innovation and Opportunity Act (WIOA).
- Duns & Bradstreet EconoVue Platform (Employment Services) – purchase of D & B software with Wagner Peyser 10 percent set aside
    - This platform is being utilized to evaluate small, medium, and large employers in the state to determine potential needs for serving businesses in their respective business life cycles. This platform will support our efforts to better case manage employers as we have outlined in our Business Engagement Plan.
- Case Management RFP - TDLWD is currently working with our Central Procurement Office and Strategic Technology Solutions to procure a new Case Management system within this 4-year planning cycle. This new system will replace a system that has been in place for the past 10 years.
- Economic development projects via customized training and on-the-job training opportunities
- Expansion of innovative services for youth, re-entry, underemployed adults, etc.
- Potential change in AJC structure (especially brick and mortar)
    - Offsetting costs for non-traditional work sties (local courthouse, library, school, etc.)
- Support of pilot projects that will lead to expansion of serving individuals "where they are" in the communities to include: provide AJC staff in housing and development areas,

community colleges, and other highly populated areas that may include potentially eligible job seekers.

- State Board Certification – TDWLD is working with a state partner to deploy a State Workforce Development Board (SWDB) Certification Program for the Tennessee Department of Labor and Workforce Development (TNLWD). Utilizing the Baldrige criteria, the partner will measure success through measuring compliance standards (including WIOA governance requirements and Baldrige Criteria elements), demonstration of board competence, and levels of strategic achievement. This project will initially focus on what is learned at the state level to deploy board certification at the local level, share best practices across the state, and providing related professional development.
- Other Selected Initiatives – new learning management system, incentive/performance based awards, and rural counties specific funding.

The Rapid Response set aside in the first year is used to support layoff aversions and provide assistance to workers impacted by layoffs, plant closures, or natural disasters. After the first years, any unobligated funds are used to support the aforementioned statewide activities.

C. 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 respond to layoffs and closures quickly and effectively. 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 shall designate 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 five 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 used to assist with 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. This effort enhances supportive service offerings to people who need it most in these situations.

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 LWDAs 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 Employer Services works with multiple partner agencies, including Adult Education and Vocational Rehabilitation in the LWDAs, 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.

D. 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 an NDWG 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:

- Classroom training
- Daycare
- Jobs at work sites, including wages and benefits
- Mileage
- On-the-job training
- Out-of-area job search and relocation
- Outreach and communications
- Tools needed for the job
- Work-related physical exams and medical exams

TDLWD has 5 mobile American Job Centers stationed across the state. In the event of a disaster, TDLWD will coordinate with TEMA, FEMA, and the LWDAs to mobilize the units to set up information and command centers in local communities to provide DWU and Rapid Response services.

E. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) AND ENSURES THE PROVISION OF APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED. (SECTION 134(A)(2)(A) AND TAA SECTION 221(A)(2)(A) .) THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE 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 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 AND HOW THE STATE WILL ENSURE THE PROVISION OF APPROPRIATE CAREER SERVICE TO WORKERS IN THE GROUPS IDENTIFIED IN THE PETITION (TAA SEC. 221(A)(2)(A)).NOTE: UNTIL THE TAA PROGRAM IS REAUTHORIZED, THE REQUIREMENTS TO PROVIDE RAPID RESPONSE AND APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A PETITION HAS BEEN FILED IS NOT APPLICABLE.

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].

A top priority is investing in our youth, and 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 Assistance program, that in the past has not utilized WBL programs, will now leverage the use of this type of instruction for eligible trade-impacted participants.

Work-based learning programs complement all apprenticeship models, including pre-apprenticeships and youth apprenticeships. 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 aged 16 and 17. Additional program-specific details regarding the integration of apprenticeship models in Tennessee are provided below.

Out-of-school youth participants also benefit from this comprehensive strategy for work-based learning. The State Youth program has created a new framework within a Youth Strategic plan for forging stronger partnerships with area nonprofits, other state departments, and external 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. More details regarding in-school and out-of-school youth services, include work-based learning, are provided later in the Youth Services section of this plan.

[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., outreach to sponsors and prospective sponsors, identifying potential participants and connecting them to apprenticeship opportunities).

The key to growing Registered Apprenticeship programs in Tennessee continues to be providing knowledge and communication. This outreach is a multi-layered approach and includes several audiences – AJC staff, business and industry (employers), apprentices (existing and new hire employees). Under the Apprenticeship State Expansion grant, the Office of Apprenticeship 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, information-sharing materials with Office of Apprenticeship contact information are being developed for reference and are provided to employers as handouts. The Office of Apprenticeship will be working with the T.O.S.S. and Communications offices to develop additional informational and outreach tools, including videos, that agency staff can share with employers and workers seeking employment opportunities. These materials will be readily available for all staff members in all locations.

While the ApprenticeshipTN website launched in 2020, it continues to evolve, just as Registered Apprenticeship Programs grow. This website is a tool for staff members to locate active apprenticeship programs in TN as they work with individuals seeking employment in apprenticeship programs. Employers and job seekers also utilize the website to learn more about the benefits of Registered Apprenticeship Programs and locate staff contact information. Through our collaborative partnerships the ApprenticeshipTN website and other state agency websites are linked to present a unified effort on Apprenticeships. The Office of Apprenticeship intends to include the informational and outreach tools developed on the website for additional touch-point opportunities.

The Office of Apprenticeship has increased its staff to nine (9) positions. It will realign the positions to streamline support for the continuing increase in Registered Apprenticeship Programs. In addition to the State Director, three Regional Apprenticeship Directors, a Grants Program Manager, a Compliance Officer, and one Apprenticeship Specialist, the office will realign positions to add a Data Analyst and two support positions. The Office of Apprenticeship

will seek opportunities through grants to provide additional support as needed with the growth of Registered Apprenticeship Programs.

As part of National Apprenticeship Week, the Office of Apprenticeships hosts three regional conferences across the state. Partnering agencies and employers are invited to learn more about the benefits of Registered Apprenticeship Programs. For the 10th Anniversary of National Apprenticeship Week, the Office of Apprenticeship plans to expand opportunities to focus on the benefits of apprenticeships as part of the celebration. The ApprenticeshipTN team will develop a strategic partnering plan to reach more employers and celebrate the accomplishments of its apprentices as it provides information about the benefits of Registered Apprenticeship Programs.

Finally, to ensure engagement and alignment with business and industry, Tennessee's Apprenticeship Council was established by the State Legislature in 2021 and is composed of eleven (11) individuals appointed by the governor. Ex-officio council members are leaders of state employment and educational agencies (or their designees). The remaining members are individuals representing public and private sector employer and employee organizations and one knowledgeable public representative familiar with apprenticeships and apprenticeable occupations. In addition to advising Tennessee's Office of Apprenticeship regarding duties set forth by Tennessee's legislation, the committee is also charged with providing community outreach and education regarding the benefits of apprenticeship. The Apprenticeship Council meets quarterly and features presentation from industry leaders, review applications for new register apprenticeships across the state and advise on changes and improvements for apprenticeship opportunities across the state.

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.
- Information concerning whether a provider is in a partnership with a business.
- Evidence that the program successfully leads to an ETPL Qualifying Credential.
- Information addressing the alignment of training with in-demand industry sectors and occupations, to the extent possible.
- 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 select programs 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 the program successfully leads to an ETPL Qualifying Credential:
    - ETPL Qualifying Credential is defined in Section 2 of the State Workforce Services Policy Eligible Training Provider. See below for an excerpt:
    - Programs may be delivered in person, online, or via a blended approach and must lead to at least one ETPL Qualifying Credential defined as:
        - A. An industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the State of Tennessee or federal government;
        - B. A postsecondary credential, including an associate or baccalaureate degree:
        - C. A secondary school diploma or its equivalent;
        - D. Employment, or
        - E. Measurable skills gains toward a recognized postsecondary or secondary school diploma or its equivalent credential.
- 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 one of 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, or credential attainment)

After the LWDB votes on the ETP's application, written notification must be submitted to the State within ten (10) business days of the decision to add, postpone, 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:

- The State Workforce Services Policy Eligible Training Provider details the concerns with Continued Eligibilty. Section 4(B)(1)(g) states: "*ETP's ability to offer quality training services leading to an ETPL Qualifying Credential."*
    - Based on the definition in the policy for qualifying credential, that one section addresses the three bullet points that are needed for continued eligibility.

- The State Workforce Services Policy Eligible Training Provider references that RAPs can opt-in to the ETPL in Section 5. Our State Workforce Development Board Guidance-ETPL Registered Apprenticeship Programs under section 2.1 provides the procedures to opt-in. See the below excerpt:
    - *"Registered Apprenticeship program sponsors are automatically eligible for placement on the statewide ETPL. The TN Office of Apprenticeship informs RAP sponsors of their automatic eligibility for the ETPL and encourages interested program sponsors to opt-in by contacting WFS.ETPL@tn.gov."*

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. This data-driven method ensures that all parties strive to provide prepare workers for high quality jobs. 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 as follows:

- WIOA student completion rate for each program must be ≥ 40%.
- All student completion rates for each program must be ≥ 60%
- WIOA student placement rate for each program must be ≥ 40%.
- All student placement rates for each program must be ≥ 60%.

As subsequent eligibility determinations are made, 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.

Additional continued eligibility requirements include:

- Whether the providers timely and accurately submitted all the information required for completion of eligible training provider performance reports required under WIOA 116(d)(4) and all the information required for initial and continued eligibility.
- ETP performance on WIOA performance indicators: Unsubsidized Employment 2nd Quarter or 4th Quarter after exit, median earnings, credential attainment.
- Access to training services throughout the state, including rural areas and through technology use.
- Information reported to state agencies on federal and state training programs other than WIOA Title I-B programs.
- The degree to which training programs relate to in-demand industry sectors and occupations in the state.
- State licensure requirements of training providers, and licensing status of providers of training services, if applicable.
- ETP's ability to offer quality training services leading to an ETPL Qualifying Credential.

- ETP's ability to provide trainings that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities.
- ETP's ability to provide training services to individuals who are employed and individuals with barriers to employment.

Providers who substantially violate the requirement to timely and accurately submit all required information for completion of the ETP performance reports required under WIOA Section 116(d)(4) and all the information required for initial and continued eligibility must be removed from the ETPL. Substantial violations include but are not limited to:

- Failure to submit annual performance reports by the deadline.
- Failure to keep current the eligible training provider and program demographic information displayed on the ETPL.
- Failure to respond to a State request for a data validation visit.
- Poor performance during a data validation visit.
- Failure to submit corrections needed following yearly report validation by the specified deadline.
- Failure to comply with State requests for information.

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 training provider 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.

Upon receipt of an appeal, the State will notify the associated LWDB as well as the appealing ETP that the appeal request has been received. The ETPL state appeals review process is completed within (60) business days upon receipt of appeal. Documentary evidence will be collected from both parties and submitted to impartial members of the ETPL State Appeals Committee for review. The LWDB and the appealing ETP will receive an explanation of the committee's ruling in writing. The LWDB enacts the committee's ruling within (10) business days.

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. To be included on the ETPL, RAPs must express interest by opting-in. Local areas must add them without applying any additional eligibility requirements that applies to other types of training providers.

RAPs must provide information necessary to verify the registration status for the RAP by providing certification of registration available in RAPIDS 2.0. The ETP coordinator may work with the state office of apprenticeship to facilitate the process, enabling these programs to be placed on the statewide ETPL with minimal burden.

RAP sponsors who wish to be included on the ETPL can access the provider application through Jobs4TN.gov or by emailing Apprenticeship.TN@tn.gov or ETPL Coordinator/general mailbox.

RAPs must provide the following basic information:

- Occupations included within the RAP
- Name and address of the RAP sponsor
- Name and address(es) of the related technical instruction provider(s) and the locations(s) of instruction if different from the program sponsor's address
- Cost of the instruction, if the provider of the Related Technical Instruction is different from the program sponsor
- Method and length of instruction
- Number of active apprentices

RAPs 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).

RAPs are maintained on the ETPL until:

- They are deregistered
- The RAP notifies the State that it no longer wants to be included
- The RAP is determined to have intentionally supplied inaccurate information or to have substantially violated any provision of Title I WIOA or the WIOA regulations, including 29 CFR Part 38.

RAPs are exempt from performance reporting requirements in WIOA § 116(d)(4) and 122 but are encouraged to voluntarily report performance outcomes when possible.

4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR FOR THE ADULT PRIORITY OF SERVICE REQUIREMENT IN WIOA SECTION 134 (C)(3)(E) THAT REQUIRES AMERICAN JOB CENTER STAFF, WHEN USING WIOA ADULT PROGRAM FUNDS TO PROVIDE INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES, TO GIVE PRIORITY OF SERVICE TO RECIPIENTS OF PUBLIC ASSISTANCE, LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT (INCLUDING ENGLISH LANGUAGE LEARNERS).

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/workforce/contact-the-department0/boards---commissions/boards---commissions-redirect/state-workforce-development-board/wioatechnicalassistance.html

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 need 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 (and supportive services if necessary).

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

6. DESCRIBE THE STATE'S POLICY ON WIOA AND TAA CO-ENROLLMENT AND WHETHER AND HOW OFTEN THIS POLICY IS DISSEMINATED TO THE LOCAL WORKFORCE DEVELOPMENT BOARDS AND REQUIRED ONE-STOP PARTNERS. TRADE ACT SEC. 239(F), SEC. 235, 20 CFR 618.325, 20 CFR 618.824(A)(3)(I).

TAA Co-enrollment memorandum was established in January 1, 2023 to mandate the co-enrollment of TAA participants into Title I DW. This memorandum further defines the process

of co-enrollment and how to case manage these individuals. The requirement for co-enrollment is further enhanced through annual KPIs requiring 100% co-enrollment of eligible participants. Below is the "State Workforce Development Board Memorandum for Trade Adjustment Assistance Co-Enrollment" for reference:

https://www.tn.gov/content/dam/tn/workforce/documents/wfs/WFS_Memo_Trade_Adjustment_Assistance_Co-Enrollment.pdf

7. DESCRIBE THE STATE'S FORMAL STRATEGY TO ENSURE THAT WIOA AND TAA CO-ENROLLED PARTICIPANTS RECEIVE NECESSARY FUNDED BENEFITS AND SERVICES. TRADE ACT SEC. 239(F), SEC. 235, 20 CFR 618.816(C)

Section 4 in the "State Workforce Development Board Memorandum for Trade Adjustment Assistance Co-Enrollment" covers the state's strategy for ensuring co-enrollment between WIOA and TAA participants. The language reads as following:

TAA co-enrollment requirement does not require use of DW funds. The primary purpose of co-enrollment with DW is to promote access to DW program services, including career decision making and career guidance services, individualized occupational exploration, how to conduct labor market research and find local information, exploration of training options, training readiness, participation in dislocated professionals support groups, workshops offered by the DW program and even employment retention and career ladder guidance for A/RTAA participants that won't result in direct participant cost obligations.

There may be instances where a need for direct supportive services that cannot be funded by the TAA program are required. In these situations, funding for eligible supportive service such as travel/transportation, childcare, etc. would be covered through DW funds as part of co-enrollment.

On-site monitoring occurs for each Comprehensive AJC where TAA central office are located, and technical assistance is provided for new and existing staff that require training regarding co-enrollment.

8. DESCRIBE THE STATE'S PROCESS FOR FAMILIARIZING ONE-STOP STAFF WITH THE TAA PROGRAM. 20 CFR 618.804(J), 20 CFR 618.305

TAA staff receive a copy of the TAA Manual referenced below:

https://www.tn.gov/content/dam/tn/workforce/documents/ProgramManagement/TAA_Manual.pdf

Specifically, in the TAA Manual, it is noted that for TAA Participation, establishing participation in the TAA program starts with setting up an Initial Assessment activity in Jobs4TN (VOS). All TAA workers must have specific activities offered to them as part of core and intensive services. Initial Assessment is always the first service offered to the adversely affected worker - followed by these activities (not necessarily in this order):

- IEP – Individual Employment Plan (VOS activity code 205) must be developed on all TAA participants
- LMI – Labor Market Information (VOS activity code 107) that will assist with reemployment
- Job Search (VOS activity code 125) Suitable employment search required prior to requesting training

- Referral to AE – Assessment (TABE/CASAS testing) (VOS activity code 138)
- Referral to Title 1 (VOS activity code 134) - required for co-enrollment with the Dislocated Worker program
- Rapid Response (VOS activity code 110) adversely affected worker attended a rapid response meeting
- There may be other activities that you include on the adversely affected worker, but the list above is required on all TAA workers that are looking at occupational training.

Implementation of the above reference manual, and annual on-site monitoring of each Comprehensive AJC where TAA central office staff assess AJC staff on their understanding of program requirements, provide for opportunities where staff may lack any understanding and require subsequent training.

C. YOUTH PROGRAM REQUIREMENTS.

With respect to youth workforce investment activities authorized in section 129 of WIOA, States should describe their strategies that will support the implementation of youth activities under WIOA. State's must-

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.[11] FURTHER, INCLUDE A DESCRIPTION OF HOW THE STATE ASSISTS LOCAL AREAS IN DETERMINING WHETHER TO CONTRACT FOR SERVICES OR TO PROVIDE SOME OR ALL OF THE PROGRAM ELEMENTS DIRECTLY.

[11] Sec. 102(b)(2)(D)(i)(V)

The local boards will adhere to the procurement policy issued by the 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.

- State Workforce Development Board Policy- One-Stop Operator and Service Provider Procurement includes language on procurement requirements for Youth Service Providers that the LWDBs must follow. Section II has the following requirements:
    - *"Bidders must demonstrate the ability to successfully meet Federal and State performance accountability measures to include performance indicators established by ETA and Key Performance Indicators (KPIs) set by the SWDB in their delivery of services. Bidders must also commit to successful outcomes for all contracted services. In all cases, the LWDBs must ensure that all sub-recipients and*

contractors are monitored for quality of services and achievement of the above performance standards."

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 providers to ensure all Tennesseans are receiving adequate high-quality linkage to the workforce system, and supportive services to achieve completion.

2. EXPLAIN HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN ACHIEVING EQUITABLE RESULTS FOR OUT-OF-SCHOOL AND IN-SCHOOL YOUTH. DESCRIBE PROMISING PRACTICES OR PARTNERSHIP MODELS THAT LOCAL AREAS ARE IMPLEMENTING AND THE STATE'S ROLE IN SUPPORTING AND SCALING THOSE MODELS WITHIN THE STATE FOR BOTH IN-SCHOOL AND OUT-OF-SCHOOL YOUTH.

The State recognizes as a top priority investing in youth, and 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 recognizes the importance of strategic partnerships and will continue to collaborate with partner agencies and organization 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. A Youth Strategic Plan is being drafted that will set forth strategies and priorities to leverage partnerships and strengthen the pipeline between employers and youth. Also included in this plan will be specific goals and strategies on how to reach

disadvantaged youth with barriers, including homelessness and justice-involved youth, with the goal of ensuring these youth have increased opportunities to receive WIOA services.

Also, the State intends to expand funding opportunities to nonprofits and other entities that are currently serving at-risk youth and have established programs and services that align with one or more of the 14 youth program elements. The State will produce a comprehensive youth program framework that local boards and entities will use to construct program design and delivery from a local perspective. These combined efforts will contribute to improved outcomes for the growing number of out-of-school youth participants.

Tennessee will utilize multiple strategies for improving the outcomes for the out-of-school youth population. This includes utilizing 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 will continue to hold monthly partner meetings to ensure all partners, core and required, are aware of program operations and fostering alignment across program enrollment and service delivery. These meetings will also serve as a collaborative report-out on local youth activities, partner program engagement, sharing best practices and exploring potential expansion in partnership with non-core partners.

To expand and sustain the focus on youth work experience, the department is utilizing state fund to support the Tennessee Youth Employment Program (TYEP) to serve all youth (including those not WIOA-eligible) between the ages of 14-24. This program will provide opportunities for work experience in all fields of employment and include the involvement of local workforce boards as well as community organizations across the state. With the first round of funding being available in FY23, there was a “soft launch” of the program held for summer 2023, including community partners such as Peer Power in Memphis and the Urban League, and Big Brothers & Big Sisters across multiple cities in the state. As the department prepares for a full launch of the program in Q2 2023, more community partners will be engaged, expanding the opportunities to put more youth to work across the state. The State is utilizing a marketing agency and internal communication teams to implement a statewide advertising campaign for TYEP, including advertisements on radio, TV, and social media targeting youth, employers, and parents. Additionally, a communications toolkit was developed and distributed to local areas and participating partner agencies.

While work experience has been a historical program element under WIOA youth services, this addition of state funding allows the department to maximize WIOA funds for other services needed by out-of-school youth with minimal restrictions. The program design allows for the participants wages and other liabilities to be covered by the grant while the employer focuses on providing quality work experience training, soft skills training and real-life experience on their work site. This program will help the State learn best practices to implement for the WIOA Youth program and expand resources to support businesses who employ youth.

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 complement 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. To expand the partnership strategy to core program partners and other stakeholders, the state has launched the Tennessee Youth Employment Program (TYEP) 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.

3. DESCRIBE HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN IMPLEMENTING INNOVATIVE MODELS FOR DELIVERING YOUTH WORKFORCE INVESTMENT ACTIVITIES, INCLUDING EFFECTIVE WAYS LOCAL WORKFORCE BOARDS CAN MAKE AVAILABLE THE 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2); AND EXPLAIN HOW LOCAL AREAS CAN ENSURE WORK EXPERIENCE, INCLUDING QUALITY PRE-APPRENTICESHIP AND REGISTERED APPRENTICESHIP, IS PRIORITIZED AS A KEY ELEMENT WITHIN A BROADER CAREER PATHWAYS STRATEGY.

The State has a policy Workforce Services Policy- Youth Program Service Design and Framework that defines a programmatic framework for all WIOA-funded youth programs, which went into effect on June 5, 2020. Under this policy, an orientation is required to be conducted with each eligible youth participant that includes information on the 14 program elements within the Title I youth program (including pre-apprenticeship programs), and which entity administers each element within the Local Workforce Development Area (LWDA). The State also works closely with the Local Workforce Development Board (LWDB) through frequent technical assistance calls, in-person monitoring, and case file reviews to ensure that work experience is prioritized within a broader career pathways strategy and to share best practices across the state.

The State will conduct annual monitoring as outlined in State's most current monitoring guide. Regular quarterly desktop reviews of Youth enrollments will also continue, with results and Technical Assistance (if necessary) communicated to each local area. 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. Additional details on pre-apprenticeship programs are provided in the section above related to Registered Apprenticeships and connections to the K-12 system.

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.

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.

- The Training, Oversight, and Strategic Support (TOSS) along with the Youth Director and Youth program staff monitor Title I Youth procedures and policies on an annual basis to ensure compliance with the Title I Youth program. This monitoring includes a review of the required policies the Local Workforce Development Boards (LWDB) must have implemented. The requirement of defining additional assistance was placed on the LWDBs on June 5, 2020, and has been effective since that requirement was issued.

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.

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 DISBURSAL 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).)

Not applicable

4. A DESCRIPTION OF THE ROLES AND RESOURCE CONTRIBUTIONS OF THE ONE-STOP PARTNERS.

Not applicable

5. THE COMPETITIVE PROCESS USED TO AWARD THE SUBGRANTS AND CONTRACTS FOR TITLE I ACTIVITIES.

Not applicable

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.

Not applicable

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.

Not applicable.

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.

Not applicable.

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 MOST RECENT DATA AVAILABLE REGARDING THE RESULTS AND OUTCOMES OBSERVED THROUGH IMPLEMENTATION 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:

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 ligancy 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:

We would like to continue utilizing the flexibility of the waiver beyond program year 2022.

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 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 LWDAs.
- 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 LWDAs. 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.

1.

    a. **Evidence that the State met its goals (performance results) for its last waiver approval;**

The data regarding performance results for the last waiver approval would be available through the WIRED division.

1.

    a. **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 2022 and 2023 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.

1.

    a. **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 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, and they are participating in the Summer Youth Employment Program initiative as a partner.

#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 remaining at a low-level post-pandemic, 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 Statuary or Regulator Barriers:

TN applied for the waiver in June 2018 and US DOL ETA granted TN this waiver request for program years 2022 and 2023. TN would like to continue utilizing the flexibility of the waiver beyond program year 2023. 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.

1.

    a. **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 in 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.

1.

    a. **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 who are still developing partnerships that will allow the use of ITAs for ISY.

1.

a. **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 childcare, 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 school 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	Yes

The State Plan must include	Include
program's Disabled Veterans' Outreach Program (DVOP) specialist;	
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

The State Plan must include	Include
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	83.4		83.9	
Employment (Fourth Quarter After Exit)	82.0		82.5	
Median Earnings (Second Quarter After Exit)	7,800		7,850	
Credential Attainment Rate	72.4		72.9	
Measurable Skill Gains	72.3		72.8	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	84.3		84.8	
Employment (Fourth Quarter After Exit)	83.3		83.8	
Median Earnings (Second Quarter After Exit)	8,699		8,749	
Credential Attainment Rate	69.9		70.4	
Measurable Skill Gains	73.9		74.4	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	82.5		83.0	
Employment (Fourth Quarter After Exit)	80.1		80.6	
Median Earnings (Second Quarter After Exit)	5,234		5,284	
Credential Attainment Rate	64.5		65.0	
Measurable Skill Gains	60.3		60.8	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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 is aware of how to refer a customer to a job posting as well as how to result in the outcome of that referral if the information is obtained. Case noting is used to give an account of interactions between staff and customers. Staff participates in professional training at a minimum of once per quarter. This is designed to develop and strengthen proficiency in career assessment and advising for job seekers. It provides needed insights into the use of discernible labor market data to better equip job seekers in selecting a viable in demand career that offers high quality wages. Included are partner staff from all core programs. The training also includes strategies to better assist employers in recruitment and retention services at a local and regional level.

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

Through the RESEA selection process, AJC staff can work with the claimant, assisting with job searches and providing referrals to partner programs that can provide necessary education and/or training to get the claimant back to work.

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 AJC 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 Reemployment Services and Eligibility Assessment (RESEA) program.

The RESEA program serves 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 (UIPL) are reviewed and distributed across the RESEA management team, as well as key staff members in other core programs. Through the state's virtual one-stop system (VOS), RESEA staff have the ability to efficiently collaborate with UI program staff to address UI eligibility issues. Ongoing communications provide the capacity for learning to occur across the programs. When eligibility issues are detected, a dedicated UI adjudication agent deals specifically with RESEA customers.

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, when positions and funding allow, 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 strategic partnership also enhances supportive service offerings for the customer. This 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, again when positions and funding allow. 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.

Currently UI is assisting by other means such as virtual meetings pilot, attending rapid response meetings, and the AJC question/issue list that go to a dedicated team within Claims Operations.

C. DESCRIBE THE STATE'S STRATEGY FOR PROVIDING REEMPLOYMENT ASSISTANCE TO UI CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS

Unemployed individuals receive multiple services from all 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 Reemployment Services and Eligibility Assessment (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.

The State of Tennessee is currently reviewing data to determine claimant characteristics that may indicate repeated claims filing. Those that they are identified as "high risk" will be provide employment rapid assessment, training, and career services to alleviate chronic job dislocation The data sharing from the UI team to local one stop centers helps in creating a proactive service offering to those most in need.

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 Jobs4TN landing page. 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 WIOA program enrollment for 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. Consistent with previous years, H2A job order have increased. In 2021, employers job orders increased to 551, requesting a total of

6,579 H2-A workers. In 2022 agricultural employers placed 591 job orders, requesting a total of 6,648 H2-A visa holders.

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, corn, cotton, wheat. 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. 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 into the use of highly sophisticated equipment using the latest in GPS technology as well as the use of drone technology.

Training still is a large part of the agricultural industry. However, over the years those needs have changed from mostly maintenance of farm equipment to the integration of farming technology.

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.

Tennessee has a thriving H2A visa program that continues to increase annually, which account for more than 6,648 MSFWs in Tennessee. The H2A visa holders do a vast array of job duties while on a farm. Some operate agricultural equipment, some plant and harvest row crop, while others work in agricultural construction to name a few. However, the need for qualified labor is still there, therefore, job advertisements are posted on our state website jobs4tn.gov.

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

In Tennessee our five main labor-intensive crops currently are soybean, tobacco, cotton, wheat and hay, with livestock fast becoming one of the five. Many farms exist within our state, however, most are geographically located beginning in Northwest, TN, extending into Southeast, TN. The livestock industry saw U.S. beef exports from January through August 2023 decrease 12.3% compared to 2022. Total beef export value over the first eight months of 2023 totaled $6.69 billion, a decrease of 18.8% compared to 2022. Pork exports during the first eight months of 2023 were 10.6% higher than 2022 with export values totaling $5.32 billion, an increase of 8.3% compared to 2022.

“Cattle prices are expected to plateau in 2024 but remain strong relative to recent years,” said livestock specialist Andrew Griffith, also in the UTIA Department of Agricultural and Resource Economics. “Red meat demand should support beef and pork prices, as demand has remained strong and total production will moderate.

According to the UT Institute of Agricultural, A Total 2023 U.S. agricultural and related exports were down 9% when compared to 2022 due to lower volumes and lower prices, decreasing the value of U.S. exports. The factors affecting exports at the national level also affected Tennessee. Although the state’s agricultural and related exports were $3 billion, up $337 million or 13% when compared to the previous fiscal year, Tennessee experienced decreases in all major categories, except for consumer-oriented agriculture, which was up $437 million or 34%. The overall increase in exports this fiscal year was due to exports of distilled spirits. Key exports for the state included distilled spirits at $1.2 billion and cotton at $846 million, which increased by $477 million and decreased by $37 million, respectively. Exports of bulk agricultural commodities, which include cotton, tobacco, and soybeans, totaled $956 million, down $6 million or 1%; exports of intermediate products such as soybean meal and oil and other feeds totaled $177 million, down 23%; and related-product exports, which are mostly forest products, totaled $158 million, down 21%. Tennessee continues to be a leading exporter of forest products at $156 million, despite the 21% decline compared to the previous fiscal year.

The highest priority for employers/farmers is to have a consistent reliable workforce. Most all agricultural labor is completed by foreign labor. There is now, was and will be an issue with find reliable local farm labor. If it were not for the H2A visa program and those of a similar nature, Tennessee’s agricultural economy would suffer greatly. A need that farmers are expressing is one of streamlining the H2A visa process to reduce the paperwork, timeframes and time spent petitioning for visa status.

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. Though several factors contributed to limiting the number of MSFW workers, a prominent one was the increase in H2-A holders. PY2021, 551 job orders were completed and 6,579 H2A visa holders were granted enter into the country. PY2022 591 job orders were completed and 6,648 H2A visa holders were granted entry. Tennessee's MSFW population are predominately from Mexico and speak Spanish. Our MSFW population is mostly comprised of H2A farm workers here for seasonal work. Once, the contract time expires, they will return to their home country to await the next growing season. Tennessee's MSFW annual peak season is from February 1 to September 30, which is traditionally our growing season. During peak season, approximately 6,000 MSFW live on farms where they are employed. The remaining time is considered non-peak season, October 1 to January 31. According to our National Farmworker Job Program (NFJP) partner, TOPs, approximately 157 MSFWs are present during non-peak season. Like H2A workers, these are Spanish speaking seasonal workers from Mexico. However, unlike H2A workers, these workers remain in the U.S. migrating from state to state.

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:

Tennessee has posted three full time outreach positions, for West, Middle and East Tennessee. These positions are posted seeking multilingual candidates to best serve the MSFW communities. Spanish and English speaking candidates are ideal as the majority of MSFW in Tennessee speak Spanish. When hiring, emphasis will be placed on the applicant's MSFW background and/or experience with farm worker activities. This is very important skillsets to have since most MSFWs do not visit the AJC, therefore outreach workers will spend most of their time in the field. These positions will be full-time and year round, in peak and non-peak season. The main duties/responsibilities of each position will be to diligently visit MSFWs living, gathering, and working areas to communicate the full scope of Tennessee's workforce services as well as inform about other farmworker organizations. Tennessee will continue to partner with Tennessee Opportunity Programs (TOPS), 167 National Farm Worker Jobs Program (NFJP) grantees for outreach services. The following portrays the various steps leading to an active enrollment efforts with TOPS:

· The SWA will coordinate with the Outreach Specialist and the local AJC Offices to continue training and explanation of services offered.

· The Outreach Specialists will case manage and 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 TABE 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 third quarter of 2022-2023 TOPs served 60 new MSFW which totaled 133. Of which 22 entered employment. During the same quarter 91 days, 683 hours of time was spent performing outreach. We have found that MSFWs are concentrated in specific locations with some scattered throughout the state. The Outreach workers in East, West, and Middle Tennessee will locate and outreach to the MSFW populations not reached by normal methods.

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 AJCs. The SWA will also coordinate with TOPS to use the mobile career coach units to bring AJC services to MSFWs in their home communities.

The Outreach Specialist responsibilities and activities include but are 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 MSFW'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, TABE 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.

· Meeting at community gathering areas for MSFW.

· Networking with businesses in the area that use MSFW labor.

· Networking with religious organizations in the MSFW communities.

· Being present at job fairs and non-profit centers.

A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES

When the SWA places workers on a clearance order, the employer is notified in writing that the SWA, must conduct random, unannounced field checks to determine and document whether wages, hours, working, and housing conditions are being provided. The State Monitor Advocate will be notified of said placement at which point an unannounced field visit to the employer's place of business will be completed. During the field check the SMA will meet with project managers, crew leaders and employees to go over the full range of Tennessee's employment services, supportive services, and other MSFW related employment programs.

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.

Outreach staff will be trained and provide technical assistance in a multitude of ways. This includes but not limited to:

- Training on the AJC policies.
- Shadowing career specialist on procedures, benefits, and employment services afforded to MSFWs.
- Outreach staff will be provided training on farmworker rights.
- To help identify problematic areas when outreaching, trainings will also be conducted on human trafficking, heat illness, pesticide training, assault, sexual harassment, sex trafficking, and coercion.
- Additionally, outreach staff will be trained on the Employment Service and Employment-Related Law Complaint System by ES staff.
- Also, throughout the year, the SWA will give single topic trainings on topics like referrals, career services, employment opportunities and supportive services.
- Training opportunities such as: shadowing preoccupancy inspections, shadowing career services staff in AJC and Collaboration with TOPs our NFJP.
- Conferences: SETA, Workforce GPS, and NASWA.
- Moreover, outreach staff, schedule permitting, will be given the chance to attend any agricultural conferences, seminars, meetings, and virtual calls.
- Outreach workers will be presented with the other organizations the state currently collaborates with to better serve the MSFW community too. ES staff will help with the coordination in meeting these organizations.

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- Training opportunities such as: shadowing preoccupancy inspections, shadowing career services staff in AJC and Collaboration with TOPs our NFJP.
- Conferences: SETA, Workforce GPS, and NASWA.
- Moreover, outreach staff, schedule permitting, will be given the chance to attend any agricultural conferences, seminars, meetings, and virtual calls.
- Outreach workers will be presented with the other organizations the state currently collaborates with to better serve the MSFW community too. ES staff will help with the coordination in meeting these organizations.

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

1. INCLUDING THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING ON IDENTIFICATION OF UI ELIGIBILITY ISSUES

The Unemployment Insurance division is a partner in the AJC. AJC staff have been trained on UI procedures and policies. If procedures or policies change, notification and training is provided to the AJC staff by UI staff. UI has a new Benefits and Appeals system called IRIS. AJC staff have been provided training on how to provide meaningful assistance to UI claimants. The training consisted on how to complete a claim, submit weekly certifications as well as new self-service options that are available to them. New AJC staff and Outreach workers will receive the same training as the AJC staff Trainings on core partners and programs are provided to include Title I, Title II Title III, Title IV, and Title V, and SNAP E&T and other workforce programs such as RESEA, TAA, JVSG, Apprenticeship, Reentry.

Tennessee is in the process of putting an Unemployment staff presence back in each Comprehensive AJC across the State. We understand that many of our customers require a hands on approach to assist with filing an unemployment insurance claim or weekly certification. This strategic partnership will provide an opportunity for enhanced supportive service offerings for the claimant. This opportunity will help to drive customers to the AJC, where additional Workforce Services and partner programs can be provided, if applicable. This is a multi-year project.

Currently UI is assisting by other means such as virtual meeting with One Stop Operators and AJC staff, attending rapid response meeting, creating and disbursing a monthly informational newsletter, and an AJC/UI concerns/issue lists. If a claimant comes into an AJC with questions and the staff is unable to answer the question, a concern/issue spreadsheet is used and forwarded to UI staff for answers. The UI staff resolve the question and notify the claimant personally. Additionally, customers who contact the UI division via phone or live chat for assistance will be 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.

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.

Tennessee has posted three full time outreach positions, for West, Middle and East Tennessee. The SWA will make available different professional developments platforms available to the Merit Outreach Workers. These include but are not limited to Allison, Coursera, Workforce GPS, etc. Additionally, quarterly trainings will be conducted with state merit staff to review and provide updates on the employment services Tennessee has to offer the MSFW populations. Furthermore, outreach works will be included on invitations to attend H2A, NFJP, and national MSFWs meetings, conferences or seminars are taking place to continue their professional education and enhance their ability to provide services to both jobseekers and employers.

For hands-on experience, the SWA will coordinate with NFJP and TOPs to schedule ongoing shadowing and joint outreach activities of their case workers while in the field. During shadowing opportunities, outreach workers will be able to nurture meaningful relationships with other case workers and ensure outreach workers have an opportunity to share information the employment services Tennessee has to offer with MSFWs. These professional development activities will ensure outreach workers provide high quality services to both jobseekers and employers.

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.

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.

Tennessee is increasing outreach efforts by hiring three outreach positions throughout the state, resulting in reaching all MSFW service areas. Outreach workers will be year-round full time during peak and non-peak seasons. Outreach workers will coordinate with the NFJP, TOPs, on a regular basis. The SMA, will also conduct quarterly meetings with TOPs. Furthermore, outreach workers will schedule ongoing shadowing of their case workers to enhance outreach activities. The outreach workers will visit living, working, and gathering areas for MSFWs to explain Tennessee's employment services. As well as to outreach to MSFWs organizations, non-profit and businesses to explain what business services Tennessee has to offer. Another possibility of collaboration would be the sharing with TOPs referrals and MSFW data gathered in jobs4tn.gov.

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 to meet the recruitment needs of employers. TDLWD provides education and training on agency services to agricultural employers' caseworkers 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)

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).

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.

Although Tennessee is a non-significant state, we are still tasked with meeting the Equity Ratio Indicators (ERI). In jobs4tn.gov, when an MSFW identifies as an MSFW that information is captured. This information includes the ERI's quarterly and captured data creates individual reports showing which ERIs are met, and which ones are not. The state has reviewed the Monitor Advocate Report and Tennessee has not consistently met all ERIs. The state believes this is due to lack of adequate staffing of the outreach position. The current efforts to hire and train three outreach workers will increase the overall capacity for fulfilling all program requirements, including meeting all the ERIs. The state anticipates all ERIs will increase with the fully staffed team and with extensive, regular training, all performance requirements will be met. The SMA will review the Monitor Advocate Report as part of their ongoing monitoring responsibilities, ensuring there is regular review of the information and continuous improvement practices put in place timely.

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. Sot 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: 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans; 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	Yes

The State Plan must include	Include
within 5 calendar days; 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 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.	
5. The SWA has established and maintains a self-appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).	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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	65.2		65.7	
Employment (Fourth Quarter After Exit)	64.8		65.3	
Median Earnings (Second Quarter After Exit)	6,499		6,549	
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 [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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) Adult Education (AE) Division has worked over the past several years to implement the College and Career Readiness Standards (CCRS) and English Language Proficiency Standards (ELPS) for Adult Education. TDLWD has led trainings across the state to help local providers with standards-based instruction implementation. While the CCR standards have been implemented in Tennessee in a basic sense, refining our guidance and ensuring practitioners are implementing them properly in the classroom will be the focus of the next several 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, and using specialized staff to facilitate training and technical assistance activities to improve standards-based instruction statewide.

In the years ahead, TDLWD plans to scale up the usage of distance learning technology, including providing access to quality online training for teachers, and recommending guidance and resources for providing virtual instruction to students. Currently, many local providers develop their own methods of training teachers and determining what curriculum materials are most suitable for instruction. While there is value in some local autonomy, utilizing a statewide training platform to deliver and track training will lead to a coordinated and consistent effort in instructional delivery, and will ensure a standards-based approach is infused across the state. TDLWD curriculum and instruction staff members will focus on the development of teacher CCRS- and ELPS-based resources such as lesson plans, curriculum, and assessments. They will also develop standards training and oversee standards-based curriculum implementation.

B. LOCAL ACTIVITIES

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, 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.

In 2023, TDLWD conducted an Adult Education grant competition per WIOA's requirements. In the early months of 2027, we will conduct an Adult Base Education (ABE) grant competition in accordance with 34 CFR 463 subpart C. This new grant cycle will begin with the 2027-2028 program year, and likely last through the 2031-2032 program year. The grant competition will be announced via a request for applications (RFA), accompanying RFAs for a corrections education grant and Integrated English Literacy and Civics Education (IELCE) grant. The ABE-specific competition will award the 82.5% of grant funds designated under Section 231—less the corrections education grant amount (which will be 20% or less of the 82.5%)—to eligible providers. Grant contracts with eligible providers will require that local administrative costs are capped at 5% of their award (unless they negotiate a higher rate with TDLWD).

TDLWD will ensure that all eligible providers have direct and equitable access to apply and compete for grant contracts. We will use the same grant announcement and application process for all eligible providers in the State. To ensure direct and equitable access and the same announcement and application process, we will publish the RFA on TDLWD's website and Tennessee State Government's General Services website, and we will announce the RFA to our directory of current and potential stakeholders (including current local adult education providers, WIOA partners, state and local workforce board members, the TN Department of Education, local education agencies, the system of community and technical colleges, and county mayors).

Applicants will be required to demonstrate past effectiveness by providing performance data on their record of improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy, in the content domains of reading, writing, mathematics, and English language acquisition. Applicants must also provide information regarding their outcomes for participants related to employment, attainment of high school diploma or equivalency, and transition to postsecondary education and training. "Demonstrated effectiveness" will not be a scored part of the application, but it will be required to determine if an applicant is an eligible provider. Prior to an application being reviewed and scored, TDLWD will evaluate applicants for their demonstrated effectiveness. Applicants who do not establish demonstrated effectiveness will not have their applications reviewed, scored, or considered for funding. We will make this requirement explicitly clear in the RFA. Applicants' past performance data will also be evaluated as one of the criteria in scoring applications and considering funding awards.

In the RFA, TDLWD will require that eligible providers' applications include the following:

1.

    a. A description of how funds awarded will be spent consistent with AEFLA.

    b. A description of cooperative arrangements they have with other organizations for adult education service delivery.

    c. A description of how they will provide services in alignment with the local workforce development plan (including how they will promote concurrent enrollment with WIOA Title I programs).

    d. A description of how they will meet State-adjusted levels of performance and how they will collect data to report on performance.

    e. A description of how they will fulfill required one-stop responsibilities.

    f. A description of how they will provide services in a manner that meets the needs of eligible individuals.

g. Information that addresses the 13 considerations listed in 34 CFR 463 subpart C.

TDLWD will fulfill the requirement that grant applications are submitted to the appropriate Local Boards for review by sending the applications directly to the Local Boards and then considering any review comments they provide.

TDLWD will incorporate the above-listed application requirements and the 13 considerations from 34 CFR 463 subpart C into a scoring rubric that will be used for evaluating applications and determining funding awards.

Through the grant competition, TDLWD will fund eligible providers to establish or operate ABE programs that can include the following ABE activities:

- Adult education
- Literacy
- Workplace adult education and literacy activities
- English language acquisition activities
- Integrated English literacy and civics education
- Workforce preparation activities
- Integrated education and training

It is our imperative in Tennessee to ensure that, at a minimum, basic adult education and literacy services are offered in each of the state's 95 counties. The ABE RFA will reflect this with designated service areas that encompass all counties. The specific service delivery area designation will be determined based on an evaluation of the labor market and the needs of Tennesseans. AE services provided will include basic math, reading, writing, and high school equivalency preparation instruction. ABE services will also include career pathways activities. These include workforce preparation activities and career advisement services to help students dual enroll in or transition to postsecondary or training opportunities.

The grant will also require applicants to consider the populations of English language learners (ELLs) in a given service area, and grantees will be required to provide English language activities as part of their AE service offerings when there is a sizeable ELL population. In sum, ABE grantees will be required to provide a large suite of AE services concurrently: basic adult education and literacy, high school equivalency preparation, English language acquisition (if applicable), workforce preparation activities, and transition services.

Because the scope of this suite of services is so large, TDLWD staff will focus much of its time and resources providing technical assistance to grantees to support them in their various service offerings. The core value we will continue to instill in grantees is to focus on individual students' needs. Students who come to a program who are high level and need to pass the high school equivalency exam will receive high school equivalency prep instruction. Students who come to a program with limited English language skills will receive English language instruction appropriate for their skill level. In all cases, local providers will be encouraged to design learning pathways for each student, which will be informed by the student's education and career goals. The learning pathway will define which skills and knowledge a student needs and the classes or activities the student must complete to attain those skills and knowledge. Students' learning pathways will be designed for the ultimate goal of attaining a high school equivalency diploma and/or transitioning to postsecondary education/training or employment.

Grantees will be encouraged to do regular analysis of their service areas and student populations to determine the most efficient and effective structuring of service offerings. Grantees will regularly consider and adjust their class structure—multi-level classes offering all academic subjects, high school equivalency prep, and workforce preparation at one end of the spectrum, and single-level classes that focus on only one subject at the other end. Grantees will also regularly consider and adjust class locations and times, including virtual/remote offerings, to ensure adequate service offerings.

The specific structure of AE services from any given ABE grantee will be dependent on that agency's structure and capacity. TDLWD will use the competition process and regular technical assistance processes to ensure the organization and scope of services is as effective as possible in every service area.

The IELCE grant is narrower in funding and scope and will be designated for specific areas in Tennessee that have the largest immigrant populations. The grant will require local providers to establish and provide all required IELCE services in their designated area: English language acquisition, civics instruction, workforce preparation activities, and integrated education and training. As with ABE services, IELCE grantees will be expected to meet the individual needs of students and provide learning pathways that help students continuously improve and meet their education and career goals.

We began a strategic focus in recent years that we call "workforce development initiatives" (WDIs). A WDI is defined as any of the following programs:

- Integrated Education and Training
- Pre-apprenticeship
- Workplace AE and literacy
- Postsecondary/training dual enrollment

The expectation is for all AE grantees to always be implementing and offering at least one WDI to students in their program—especially to students who are higher level in their academic skills and knowledge (ABE 4-6 and ESL 4-6). To ensure that planned WDIs meet regulatory requirements, are based on LMI data and local industry needs, and involve necessary system partners (such as training providers, employers, and WIOA Title I/III staff), grantees will be required to submit WDI applications to TDLWD before implementation.

In addition to WDIs, we have been pushing for more intentional incorporation of workforce preparation activities from all grantees. We specifically have established expectations for each grantee to provide digital literacy and soft skills instruction to students. We plan to continue the focus of WDIs and workforce preparation activities in the coming years. We will continue to provide ongoing training and technical assistance to grantees to continuously expand and improve these offerings.

To support local providers in this effort, TDLWD has three staff members dedicated to helping local providers design, implement, and expand WDI's and student career pathways. In the coming years, we will make the WDI planning and implementation process more robust by increasing the collaboration among system partners. We will work with state-level WIOA partners to plan and provide system training to local partners across the state, and ensure they are aware of each other's programs and resources. We will train them to think about participants holistically, and to design career pathways for individuals that are grounded in LMI data and draw on all of the partners' resources.

In addition, a new and innovative initiative concerning the expansion of options for earning high school equivalency (HSE) credentials will occur in the coming years, beginning in 2024. Rather than having only one pathway for earning a HSE diploma—since 2016, the HiSET exam has been the only pathway—Tennessee will now have multiple pathways. This will include additional assessments approved by the Tennessee State Board of Education, including: GED, TABE, CASAS, and ACT WorkKeys. If a student demonstrates competency through a passing score on an approved math, reading, writing, science, and social studies exam, they will earn a HSE diploma.

The goal of expanding HSE diploma options in Tennessee is to provide more opportunities for success to our student population. This credential is critical in order for a person to access additional education, training, and employment opportunities. This is a vital workforce initiative for the state—with a struggling labor force participation rate, it is critical to develop strategies that get more Tennesseans off the sidelines and into the workforce. Allowing more options for earning a HSE diploma will help more Tennesseans to achieve this education milestone and thereby have more opportunities to engage in the workforce.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate programs that provide any of the following correctional educational programs identified in section 225 of WIOA:

- 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.

In 2023, TDLWD conducted an Adult Education grant competition per WIOA's requirements. In the early months of 2027, we will conduct a corrections education grant competition in accordance with 34 CFR 463 subpart C. This new grant cycle will begin with the 2027-2028 program year, and likely last through the 2031-2032 program year. The grant competition will be announced via a request for applications (RFA), accompanying RFAs for an Adult Basic Education (ABE) grant and Integrated English Literacy and Civics Education (IELCE) grant. The corrections-specific competition will award 20% or less of the 82.5% of grant funds designated under Section 231 to eligible providers. Grant contracts with eligible providers will require that

local administrative costs are capped at 5% of their award (unless they negotiate a higher rate with TDLWD).

TDLWD will ensure that all eligible providers have direct and equitable access to apply and compete for grant contracts. We will use the same grant announcement and application process for all eligible providers in the State. To ensure direct and equitable access and the same announcement and application process, we will publish the RFA on TDLWD's website and Tennessee State Government's General Services website, and we will announce the RFA to our directory of current and potential stakeholders (including current local adult education providers, WIOA partners, state and local workforce board members, the TN Department of Education, local education agencies, the system of community and technical colleges, and county mayors).

Applicants will be required to demonstrate past effectiveness by providing performance data on their record of improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy, in the content domains of reading, writing, mathematics, and English language acquisition. Applicants must also provide information regarding their outcomes for participants related to employment, attainment of high school diploma or equivalency, and transition to postsecondary education and training. "Demonstrated effectiveness" will not be a scored part of the application, but it will be required to determine if an applicant is an eligible provider. Prior to an application being reviewed and scored, TDLWD will evaluate applicants for their demonstrated effectiveness. Applicants who do not establish demonstrated effectiveness will not have their applications reviewed, scored, or considered for funding. We will make this requirement explicitly clear in the RFA. Applicants' past performance data will also be evaluated as one of the criteria in scoring applications and considering funding awards.

In the RFA, TDLWD will require that eligible providers' applications include the following:

1.

    a. A description of how funds awarded will be spent consistent with AEFLA.

    b. A description of cooperative arrangements they have with other organizations for adult education service delivery.

    c. A description of how they will provide services in alignment with the local workforce development plan (including how they will promote concurrent enrollment with WIOA Title I programs).

    d. A description of how they will meet State-adjusted levels of performance and how they will collect data to report on performance.

    e. A description of how they will fulfill required one-stop responsibilities.

    f. A description of how they will provide services in a manner that meets the needs of eligible individuals.

    g. Information that addresses the 13 considerations listed in 34 CFR 463 subpart C.

TDLWD will fulfill the requirement that grant applications are submitted to the appropriate Local Boards for review by sending the applications directly to the Local Boards and then considering any review comments they provide.

TDLWD will incorporate the above-listed application requirements and the 13 considerations from 34 CFR 463 subpart C into a scoring rubric that will be used for evaluating applications and determining funding awards.

Grant contracts and/or policies with eligible providers will direct that the providers must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program. TDLWD plans to fund the following corrections education activities in accordance with 34 CFR 463 subpart F:

1. Adult education and literacy activities
2. Integrated education and training
3. Career pathways
4. Concurrent enrollment
5. Transition to re-entry initiatives and other post-release services with the goal of reducing recidivism

The grant will require grantees to make connections with the local and county jail staff in their given service area, and to establish AE programs and services for the individuals incarcerated in those facilities.

Historically, we have not offered programs specific to English language learners (ELLs) in Tennessee's local and county jails. We have completed an analysis of the jail populations to determine where there are populations of ELLs, and we plan to work with the grantees in those areas to design and implement ELL-focused adult education programs in those facilities.

In addition, we plan to begin a strategic focus on implementing workforce development initiatives (WDIs) with corrections students; we already have WDIs in place in several jails and will scale this up in the future. These initiatives include establishing career goals and pathways with students, and working with system partners to provide pre-apprenticeships, integrated education and training programs, and work release opportunities.

Concerning state-level partnering and plans in the coming years, we intend to work more closely with the TDLWD Office of Reentry, the TN Board of Regents Corrections Education Initiative, the TN Higher Education Initiative nonprofit, the TN Office of Criminal Justice Programs, and the TN Department of Correction to design and implement comprehensive education-workforce pathways for incarcerated individuals. This will include robust systems and processes for referring and tracking students through their participation in various programs and through the reentry process. We have already made great progress in connecting with these various partners, and we will prioritize being more intentional about collaborative goals, initiatives, and trainings as we go forward.

Finally, in the coming years, we will continue to expand the jail tablets program in county jails across the state. These tablets provide safe and secure access for incarcerated individuals to work on adult education coursework, workforce training programs, and rehabilitative programs, with in-person or virtual instruction from teachers. This a system-wide initiative that will positively impact the tens of thousands of individuals incarcerated in Tennessee. As we expand the project, we will develop comprehensive training plans, key performance indicators, and reports to ensure the project's success and sustainability. WIOA funds will not be used to pay for the tablets, but our local providers will be expected to use staff time and resources to teach corrections education students via the tablets.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA. Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be offered in combination with integrated education and training activities found in 34 CFR section 463.36.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation.

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.

In 2023, TDLWD conducted an Adult Education grant competition per WIOA's requirements. In the early months of 2027, we will conduct an Integrated English Literacy and Civics Education (IELCE) grant competition in accordance with 34 CFR 463 subpart C. This new grant cycle will begin with the 2027-2028 program year, and likely last through the 2031-2032 program year. The grant competition will be announced via a request for applications (RFA), accompanying RFAs for an Adult Base Education (ABE) grant and corrections education grant. The IELCE-specific competition will award the grant funds designated under WIOA Section 243. Grant contracts with eligible providers will require that local administrative costs are capped at 5% of their award (unless they negotiate a higher rate with TDLWD).

TDLWD will ensure that all eligible providers have direct and equitable access to apply and compete for grant contracts. We will use the same grant announcement and application process for all eligible providers in the State. To ensure direct and equitable access and the same announcement and application process, we will publish the RFA on TDLWD's website and Tennessee State Government's General Services website, and we will announce the RFA to our directory of current and potential stakeholders (including current local adult education providers, WIOA partners, state and local workforce board members, the TN Department of Education, local education agencies, the system of community and technical colleges, and county mayors).

Applicants will be required to demonstrate past effectiveness by providing performance data on their record of improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy, in the content domains of reading, writing, mathematics, and English language acquisition. Applicants must also provide information regarding their outcomes for participants related to employment, attainment of high school diploma or equivalency, and transition to postsecondary education and training. "Demonstrated effectiveness" will not be a scored part of the application, but it will be required to determine if an applicant is an eligible

provider. Prior to an application being reviewed and scored, TDLWD will evaluate applicants for their demonstrated effectiveness. Applicants who do not establish demonstrated effectiveness will not have their applications reviewed, scored, or considered for funding. We will make this requirement explicitly clear in the RFA. Applicants' past performance data will also be evaluated as one of the criteria in scoring applications and considering funding awards.

In the RFA, TDLWD will require that eligible providers' applications include the following:

1.

    a. A description of how funds awarded will be spent consistent with AEFLA.

    b. A description of cooperative arrangements they have with other organizations for adult education service delivery.

    c. A description of how they will provide services in alignment with the local workforce development plan (including how they will promote concurrent enrollment with WIOA Title I programs).

    d. A description of how they will meet State-adjusted levels of performance and how they will collect data to report on performance.

    e. A description of how they will fulfill required one-stop responsibilities.

    f. A description of how they will provide services in a manner that meets the needs of eligible individuals.

    g. Information that addresses the 13 considerations listed in 34 CFR 463 subpart C.

TDLWD will fulfill the requirement that grant applications are submitted to the appropriate Local Boards for review by sending the applications directly to the Local Boards and then considering any review comments they provide.

TDLWD will incorporate the above-listed application requirements and the 13 considerations from 34 CFR 463 subpart C into a scoring rubric that will be used for evaluating applications and determining funding awards.

Through the grant competition, TDLWD will fund eligible providers to establish or operate IELCE programs that will include the following activities, in accordance with 34 CFR 463 subpart D:

1. Literacy
2. English language acquisition
3. Instruction on the rights and responsibilities of citizenship and civic participation
4. Integrated education and training

Because the IELCE grant is limited in funding, it will be designated for specific areas in Tennessee that have the largest immigrant populations. The grant will require local providers to establish and provide all required IELCE services in their designated area. These services will be provided to eligible individuals who are English language learners, including professionals with degrees and credentials in their native country. Services will be focused on expediting workforce training and employment opportunities for IELCE students, especially considering students who have work experience, degrees, and credentials in their native country. IELCE services include: English language acquisition, civics instruction, workforce preparation

activities, and integrated education and training, all provided in a concurrent and integrated model. IELCE grantees will be expected to meet the individual needs of students and provide learning and career pathways that help students continuously improve and meet their education and career goals.

To ensure IELCE students are being prepared for employment in in-demand industries with livable wage jobs, we will require IELCE programs to design, implement, and offer integrated education and training (IET) programs to students. To ensure that planned IET programs meet regulatory requirements, are based on LMI data and local industry needs, and involve necessary system partners (such as training providers, employers, and WIOA Title I/III staff), IELCE grantees will be required to submit IET applications to TDLWD before implementation.

A critical component of an IELCE IET program, and for helping students become more employable, is the inclusion of workforce preparation activities. We will ensure IELCE grantees are incorporating these activities into their instruction, including digital literacy and soft skills. We will purchase or recommend curriculum products, such as Worldwide Interactive Network (WIN) Learning soft skills and Northstar digital literacy, and provide training to local providers on how to use these tools with students. We also plan to recommend or procure curriculum such as BurlingtonEnglish to help IELCE students become more employable, especially through utilizing the career-contextualized English language learning materials within the curriculum.

We currently incorporate expectations for IELCE programs to provide IET programming and workforce preparations, and will continue to do so in the coming years. We will provide ongoing training and technical assistance to IELCE grantees to continuously expand and improve these offerings.

To support local providers in this effort, TDLWD has three staff members dedicated to helping local providers design, implement, and expand IET programs and student career pathways. In the coming years, these staff members will work specifically with IELCE grantees to ensure the various component of the IET programs and workforce preparation activities are effective and leading to positive student employment and training outcomes.

In the years ahead, we will increase our efforts on advocating among state-level partners and with local system partners for the IELCE programs and their services. We will ensure that these programs are considered in the local workforce development partnerships and plans. We will ensure that our IELCE providers' interests are advocated for by the Adult Education representative on each local board. To do this, TDLWD AE staff will review local workforce plans to ensure the IELCE program and students are included in the plan. We will advocate for strong WIOA partnerships at the local level, including through developing postsecondary/training pathways for IELCE students, and through establishing relationships with local employers from in-demand industries to encourage employment opportunities for IELCE students. Our staff will guide local IELCE program leaders in participating in local board meetings and ensuring their students are advocated for and included in the local workforce strategy.

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

TDLWD will utilize funds through various methods in order to carry out required State Leadership activities. These methods are addressed individually below.

Aligning Adult Education with Core Programs and One-stop Partners

To support local providers in aligning with core programs and one-stop partners, TDLWD has three staff members who will work with local AE providers. These staff members will conduct extensive planning and training activities with local AE providers, and will work at the state level and locally with system partners to design a more holistic and aligned workforce system. They will also review local plans to ensure AE interests are advocated for. They will review local workforce plans to ensure the AE program and students are included in the plan. We will advocate for strong WIOA partnerships at the local level, including through developing postsecondary/training pathways for AE students, and through establishing relationships with local employers from in-demand industries to encourage employment opportunities for AE students. Our staff will guide local AE program leaders in participating in local board meetings and ensuring their students are advocated for and included in the local workforce strategy and operations within the American Job Center (AJC) delivery system. They will also ensure AE providers have guidance concerning sharing in the AJC infrastructure costs. Lastly, we will provide regular technical assistance and guidance to local AE providers concerning their processes for informing students of the various AJC service offerings, their effectiveness at co-enrolling students in other WIOA programs and supportive services, and their processes for transitioning students to postsecondary education, training, and employment opportunities.

Professional Development

TDLWD will continue to provide AE grantees with professional development opportunities to improve program administration and instruction to students. We will utilize state leadership funds to continue to fund our "curriculum and instruction" team of staff members. These include a director of professional development, a director of academic services, and a director of ESL services. Further, we will use state leadership funds to maintain a training and professional development platform. We plan to use this platform extensively for teachers' professional development opportunities. Additionally, we will use state leadership funds to provide regular regional trainings, webinars, and conferences for local staff professional development. Where necessary and feasible, we also plan to use these funds to bring in third-party experts to provide targeted professional development in various subjects to teachers, such as math instruction, literacy instruction, and leveraging technology for teaching and learning.

TDLWD plans to provide an annual "new local program director" training conference each August or September. This training will focus on helping new local program directors understand critical policies and practices associated with program administration, including the following topics: fiscal management; NRS, assessment policy, and data management; student eligibility; program design and operations.

TDLWD plans to provide semi-monthly "local leadership webinars" in which local leaders are provide training and information on relevant topics, such as new initiatives in workforce development or curriculum and instruction, and to discuss policies or best practices in program design and operations.

TDLWD plans to conduct monthly virtual trainings or "office hours" for various local staff groups, such as career coaches, teachers, or data entry staff, to provide professional development on understanding policies and best practices for effective service delivery.

TDLWD also plans to conduct an annual or bi-annual "Tennessee Adult Education Conference" to bring all local staff together (either in-person or virtually). This conference will be to reflect on past performance, cast the vision for future performance and goals, and to provide professional development to all staff on topics relevant to their specific roles.

TDLWD will also provide targeted professional development to new or struggling local providers; we will go onsite to observe their practices and give focused training on aspects of their programming that need improvement.

Technical Assistance

TDLWD plans to use state leadership funds to provide technical assistance to local providers in the areas of (1) instructional and programmatic practices, (2) one-stop partnership roles, and (3) the use of technology. We will fund technical assistance primarily through TDLWD AE personnel costs. These staff members will plan and carry out technical assistance to local providers.

Instructional and Programmatic Practices

TDLWD personnel who will conduct technical assistance for instructional practices include the curriculum and instruction team—a director of academic services, a director of ESL services, and a director of professional development. These individuals will be at the forefront of researching best practices for AE instruction. They will also observe and gather best practices from local instructors. They will build out our training and professional development platform to house and disseminate these best practices.

Similarly, we will use funds for personnel who focus on technical assistance related to general program development and operations. These staff members will analyze local provider performance and provide targeted technical assistance to improve program design, operations, and service delivery strategies for the providers struggling the most. The staff will provide guidance concerning program development best practices and conduct trainings to facilitate discussions about best practices among local program leaders.

One-Stop Partnership Roles

TDLWD personnel who will conduct technical assistance for one-stop partnership roles include our workforce programs specialist and career pathways specialist. These individuals will work with local AE providers in collaboration with other system partners, to plan and carry out training and technical assistance to help local providers understand their responsibilities as one-stop partners. They will also make training available on our online platform. Staff will update and disseminate our "WIOA Partnership" guidance document and conduct discussions with local program staff to ensure they understand and follow the requirements laid out in the guidance.

TDLWD staff will also conduct local monitoring visits, during which we will interview local staff about their one-stop practices, and observe local American Job Centers to determine the extent to which the AE program is meeting its responsibilities. We will provide technical assistance to buoy up areas where the one-stop responsibilities are falling short. In addition, we will work with state-level WIOA partners to plan and provide system training to local partners across the state, and ensure they are aware of each other's programs and resources.

Use of Technology

TDLWD personnel who will conduct technical assistance for using technology include the grants analyst, the data specialist, and the curriculum and instruction team.

We will continue to use the state's fiscal and grants management software, SmartSimple, to process local fiscal activities, such as submitting invoices for reimbursement. TDLWD staff will

do system troubleshooting and testing to ensure it meets the needs of local AE programs and will plan and conduct training and technical assistance to the local programs.

We will conduct an RPF for a student data management system in 2024. Our data specialist will oversee this, in addition to planning and conducting regular training of local program staff on how to effectively enter data, retrieve reports, and conduct analyses to benefit their program.

We will procure a training platform in 2024. Our curriculum and instruction team will oversee this, in addition to planning and conducting regular training of local program staff on how to access the systems, create coursework for students, and complete professional development and training courses.

Our jail tablets initiative for corrections education students will need continuous support with ongoing maintenance and software renewals. TDLWD staff members will oversee this, in addition to planning and conducting regular training of local program staff on how to access and utilize the tablets and programs to maximize student usage and outcomes.

Monitoring and Evaluation

TDLWD plans to use state leadership funds to conduct monitoring and evaluation of the statewide AE program. We will fund monitoring and evaluation, and dissemination of best practices, primarily through TDLWD AE personnel costs. We will conduct regular, overarching monitoring and evaluation activities as well as in-depth monitoring of specific local providers.

TDLWD staff will regularly analyze program data to determine areas of strength and areas in need of improvement. We will develop quarterly local program report cards for "desktop monitoring" that will inform state and local staff of how local providers are performing. We will use the data from these report cards to determine which local providers need more or urgent technical assistance and training in various program areas (such as curriculum and instruction, workforce development initiatives, fiscal management, or data management).

TDLWD will develop an annual "monitoring plan" that will use a risk assessment to determine which local providers need to have in-depth, in-person, formal monitoring each program year. The risk assessment will include indicators such as how experienced local staff are, student performance in the prior year, student enrollment levels in the prior year, how many fiscal-related errors program staff commit, and prior audit findings or monitoring findings. We will use a "monitoring guide" that specifies which elements of the local program should be monitored and how state staff should acquire evidence to support findings or best practices in those elements (such as through staff or student interviews, classroom observations, reviewing fiscal records and student records, reviewing data recorded in the data management system, etc.). The formal monitoring visits will result in a monitoring report that TDLWD drafts and sends to the local provider. The local provider will then be required to develop (and have TDLWD approve) a corrective action plan to address the findings of the monitoring report and make program improvements. TDLWD will follow up at intervals after receiving the corrective action plan to ensure the local provider is making necessary progress toward resolving the findings.

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 several additional permissible activities. We will fund personnel who will focus on developing resources for instructional use,

and we will provide guidance curriculum resources (including software for distance learning) that can be used by local providers across the state. We will fund personnel who will focus on developing systems, process, and training related to transitioning students from AE services to postsecondary or training. Similarly, we will fund personnel who focus on improving and increasing local providers' collaborative activities with employers, training, providers and WIOA partners. We will fund personnel who develop content and models for integrated education and training programs, workplace learning programs, and career pathways. We will fund personnel who will focus on expanding occupational skills training for integrated English literacy and civics education students. We will also use state leadership funds for outreach resources and activities to help recruit more students into the statewide AE program.

F. ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II. Describe how the eligible agency will take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Describe how the eligible agency will use evaluations, data analysis, program monitoring, or other methods to improve the quality of adult education activities in the State.

To assess the quality of local AE providers, TDLWD staff will conduct regular monitoring activities with specific local providers. These will include a quarterly report card analysis (or "desktop monitoring") of each local provider, as well as formal, in-person monitoring of the specific local providers identified by our annual "monitoring plan" and risk assessment. We will also seek various forms of stakeholder feedback (including from local provider staff and students) that will provide insight on the effectiveness of various components of the statewide program (such as new initiatives that have been instituted, barriers to successful outcomes, state-level changes needed, additional resources needed, etc.).

In addition, TDLWD leadership will conduct monthly strategy meetings to look at performance metrics resulting from various initiatives that we have instituted, and to plan necessary changes that will help to improve outcomes. Based on monitoring, "desktop monitoring", and stakeholder feedback, we will develop and conduct regular training events and develop and disseminate guidance to improve program quality in various program areas (such as curriculum and instruction, workforce development initiatives, fiscal management, or data management).

We will provide this training and guidance through monthly leadership meetings, annual conferences, regional trainings, and local provider-specific activities. If we determine that many local providers need to improve quality in the same area, we will view this as a systemic issue and provide statewide training and guidance. If a quality issue appears to be specific to a local provider, we will provide focused training and guidance to that provider. The planning of these activities and costs associated with them will be funded with the state leadership funds.

In addition, based on the evaluation of the various data (i.e., desktop monitoring and in-person, formal monitoring, and stakeholder feedback), TDLWD will identify the local providers most in need of quality improvement, and will work with the local program leaders to draft a program improvement plan which will outline suggested changes for the program, goals and targets to achieve, and specific training activities that the local program staff should complete. We will follow up with the local program on a continuous schedule to adjust their program improvement plan as needed and to offer additional support. After the prescribed period of time, we will re-assess how the program is performing and determine if their program improvement plan needs to continue, or if their quality has improved to a satisfactory point.

Lastly, in 2023-24, TDLWD invested in a third-party evaluation of local AE providers and the American Job Center system in general. The evaluation was conducted by the organization "KPMG". Their assessment included observations and interviews with local staff and an analysis of AE program data. KPMG provided a "Program Evaluation" report which offered recommendations for program quality improvement. We will work to integrate these recommendations into our training and guidance in the coming years, including making AE services more accessible to student populations, focusing on demographic groups that have barriers (e.g., English language learners and individuals with disabilities), streamlining administrative tasks, developing outcome-focused strategies, and focusing on customer satisfaction.

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	Yes

The State Plan must include	Include
manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	
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) of WIOA;	Yes
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 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)

APPLICANT'S ORGANIZATION	**Enter information in this column**
Applicant's Organization	Tennessee Department of Labor and Workforce Development
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	**Enter information in this column**
First Name	Jay
Last Name	Baker
Title	Assistant Commissioner of Adult Education
Email	jay.baker@tn.gov

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

• Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.

• Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.

• Applicants are not required to have mission statements or policies that align with equity to apply.

• Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.

• Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

GEPA Section 427 Instructions to State Applicants for their Subrecipient Applicants

The State grantee provides a subrecipient applicant seeking Federal assistance instructions and guidance for how it must comply with the GEPA Section 427 requirement. The State grantee determines the form and content of the information a subrecipient applicant must include in its application regarding the steps it proposes to take to ensure equitable access to, and equitable participation in, its local-level project or activity. For example:

• The State grantee may require its subrecipient applicant to use and submit the GEPA Section 427 form that it is required to submit to the Department; or

• The State grantee may use a State-developed form that is sufficient to meet the GEPA Section 427 requirement.

• The State grantee maintains the subrecipient applicants' responses in the State office.

Please refer to GEPA 427 - Form Instructions for AEFLA Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.*

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

The mission of the Tennessee Department of Labor and Workforce Development (TDLWD) is to advance workforce development and improve workplace safety. TDLWD works to ensure that there is equitable access to and participation in all Adult Education activities and services across the state. To advance workforce development in the state, TDLWD is committed to improving adult education and literacy outcomes, particularly for disadvantaged communities. TDLWD has invested heavily in reentry and corrections education for the purpose of improving education and workforce outcomes of justice-involved individuals. TDLWD also focuses efforts among rural communities and immigrant communities to provide services that help these populations access greater education and economic opportunities.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of*

Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

Because we seek to provide Adult Education services to immigrant communities, English language skills are a barrier. Because we seek to provide services to justice-involved individuals, their criminal record can be a barrier. Because we generally serve minority and undereducated communities, they may have additional barriers to participation, including transportation and child care needs.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.*

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

TDLWD will work to ensure that there is equitable access to and participation in all Adult Education activities and services across the state. 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 and public outreach messages will be offered via a variety of media and communication tools and will be translated into other common languages in Tennessee such as Spanish and Arabic.

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, job postings will be announced broadly, and processes will incorporate principles of increasing diversity, equity, and inclusion.
5. During local program monitoring activities, TDLWD staff will conduct observations and interviews to ensure equitable access to services, Title VI non-discrimination rules are being followed, ADA rules are being followed, and teaching and learning accommodations for students with disabilities are being provided.
6. For local AE grant competitions, TDLWD will ensure applicants provide information to meet the requirements of Section 427 of GEPA.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.*

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

In the summer of each year, beginning in 2024, TDLWD will develop training and professional development plans for training local Adult Education staff that will include how to help them address students' barriers and ensure equitable access.

In September of each year, beginning September 2024, TDLWD will develop a program monitoring plan that identifies which local Adult Education providers will be formally monitored, and which will include a monitoring guide. The guide will address how locals are to ensure Title VI and nondiscrimination rules are being followed, and that ADA rules are being followed.

In TDLWD's next Adult Education grant competition, to be conducted in the spring of 2027, we will ensure that local grant applicants address GEPA Section 427 requirements as part of the grant application components.

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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	50.0	50.0	51.0	51.0
Employment (Fourth Quarter After Exit)	50.0	50.0	51.0	51.0
Median Earnings (Second Quarter After Exit)	3,950	5,275	4,050	5,300
Credential Attainment Rate	42.0	52.0	43.0	52.5
Measurable Skill Gains	40.5	40.5	41.5	41.5
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

PROGRAM-SPECIFIC REQUIREMENTS FOR STATE VOCATIONAL REHABILITATION (COMBINED OR GENERAL)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A. STATE REHABILITATION COUNCIL.

1. ALL VR AGENCIES, EXCEPT FOR THOSE THAT HAVE AN INDEPENDENT CONSUMER-CONTROLLED COMMISSION, MUST HAVE A STATE REHABILITATION COUNCIL (COUNCIL OR SRC) THAT MEETS THE CRITERIA IN SECTION 105 OF THE REHABILITATION ACT. THE DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPLICABLE, HAS:

Select A or B:

(A) is an independent State commission

(B) has established a State Rehabilitation Council

(B) has established a State Rehabilitation Council

2. IN ACCORDANCE WITH ASSURANCE (A)(1)(B), IF SELECTED, PLEASE PROVIDE INFORMATION ON THE CURRENT COMPOSITION OF THE COUNCIL BY REPRESENTATIVE TYPE, INCLUDING THE TERM NUMBER OF THE REPRESENTATIVE, AS APPLICABLE, AND ANY VACANCIES, AS WELL AS THE BEGINNING DATES OF EACH REPRESENTATIVE'S TERM.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	1st Term	09/2021
Parent Training and Information Center	2nd Term	10/2023
Client Assistance Program	2nd Term	10/2023
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	2nd Term	10/2023
Community Rehabilitation Program Service Provider	1st Term	07/2022

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Business, Industry, and Labor	1st Term	10/2023
Business, Industry, and Labor	2nd Term	10/2023
Business, Industry, and Labor	2nd Term	10/2023
Business, Industry, and Labor	2nd Term	04/2021
Disability Advocacy Groups	1st Term	10/2023
Current or Former Applicants for, or Recipients of, VR services	1st Term	10/2023
Section 121 Project Directors in the State (as applicable)		
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	1st Term	10/2023
State Workforce Development Board	1st Term	10/2023
VR Agency Director (Ex Officio)	1st Term	10/2023
Representative of Disability Group	1st Term	02/2022
Representative of Disability Group	1st Term	07/2022

3. IF THE SRC IS NOT MEETING THE COMPOSITION REQUIREMENTS IN SECTION 105(B) OF THE REHABILITATION ACT AND/OR IS NOT MEETING QUARTERLY AS REQUIRED IN SECTION 105(F) OF THE REHABILITATION ACT, PROVIDE THE STEPS THAT THE VR AGENCY IS TAKING TO ENSURE IT MEETS THOSE REQUIREMENTS.

Please note in the previous section: While these members are fully participating on the council, some may be pending approval from the Governor’s office.

Meetings are being conducted quarterly. All Selections have been made to the Governor’s Office and two are pending appointment.

4. IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION 101(A)(21)(A)(II)(III) OF THE REHABILITATION ACT, INCLUDE A SUMMARY OF THE COUNCIL’S INPUT (INCLUDING HOW IT WAS OBTAINED) INTO THE STATE PLAN AND ANY STATE PLAN REVISIONS, INCLUDING RECOMMENDATIONS FROM THE COUNCIL'S ANNUAL REPORTS, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION AND OTHER COUNCIL REPORTS.

The SRC is engaged continuously throughout the year regarding the activities, initiatives, and goals of the Tennessee VR agency. The SRC provides feedback to the VR agency at each quarterly meeting and as needed throughout the year. For the State Plan, the SRC was engaged at the beginning of the process and worked together with the VR agency to formulate their responses. The SRC identifies areas they want to focus on based on the comprehensive statewide needs assessment and relevant topics that arise throughout the year. An extremely important aspect for the SRC is the belief in diversity, equity, inclusion, and accessibility (DEIA) for all individuals in all aspects of their lives. The SRC made DEIA one of its primary focuses for both VR customers and VR employees in the State of Tennessee. The SRC continuously heard from the Blind community about the quality and availability of services to help them achieve their career goals. Therefore, the SRC engaged the VR agency and requested a comprehensive review take place. Another important topic for the SRC is the accessibility of service providers to assist VR customers in achieving their career goals. In order to make sure VR customers have access to the best providers, the SRC requested the VR agency review the current fee structure. Another topic area the SRC finds critical is the online/virtual accessibility to the TN VR program. Similarly, the SRC recommends the TN VR agency create customer journey maps to help VR customers navigate their VR journeys from start to finish.

5. PROVIDE THE VR AGENCY'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS, INCLUDING AN EXPLANATION FOR THE REJECTION OF ANY INPUT AND RECOMMENDATIONS.

List each recommendation/input followed by the VR agency response

- The SRC recommended DEIA training for all VR employees. VR agency supported this recommendation and provided required HR training along with disability specific trainings related to DEIA.
- The SRC recommended a review of the Blind Services offered through VR. VR agency supported this recommendation and contracted with a third party to complete an analysis of blind services and assist with the creation of a comprehensive strategic plan to enhance blind services in TN VR.
- The SRC recommended a review of the CRP fee structure. VR agency supported this recommendation and is conducting an analysis to determine if TN VR needs to make adjustments to the current CRP fee structure. Also, the TN VR agency has established a process to continuously review CRP fee structures to ensure equitable pay for service provisions occurs.
- The SRC recommended a review and update to the VR website. VR agency supported this recommendation and updated the VR website. The VR agency created a QR code for the SRC to utilize when sharing information with the public. The VR agency continuously reviews and updates, as appropriate, the VR and SRC websites.
- The SRC recommended the VR agency create common VR journey maps customers might take to help them understand and better participate throughout their VR journey to employment. VR agency supports this recommendation and will be working to create these with input from the SRC.

B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

1. THE VR SERVICES NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, INCLUDING:

A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES AND THEIR NEED FOR SUPPORTED EMPLOYMENT;

In 2022, in collaboration with the State Rehabilitation Council, the Vocational Rehabilitation Program conducted several assessments and relied upon existing State and national data to capture a comprehensive picture of the state's needs. VR customers and their caregivers, CRPs, VR staff, stakeholders, WIOA partners, Pre-ETS providers, and parents of students with disabilities all provided valuable feedback on the strengths and opportunities for vocational rehabilitation in Tennessee.

The CSNA seeks to address the vocational rehabilitation needs of Tennesseans that represent individuals with the most significant disabilities, including their need for supported employment services.

As part of the VR Assessment that VR and the SRC conducted, respondents across several surveys 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. Although, customers and caregivers ranked the option of "College Training" highly. More than 68% of respondents to the Customers and Caregivers survey believed that the services offered by VR met their needs. However, when respondents were asked if they believed the VR services they received assisted in eliminating barriers long term, only about 52% of respondents agreed that VR services helped remove barriers long term.

The majority of stakeholders who responded actively refer individuals for VR services, but do not believe that VR services address certain barriers. 63% of stakeholder respondents do not feel that VR staff are professionals who are informed, trained, and prepared to help VR customers match their abilities, strengths, needs, and interests with successful employment outcomes. Further, 74% do not think that VR Counselors are informed about the current and developing labor market or how to better assist customers in developing in-demand skills. While they were generally positive about VR service delivery, stakeholders submitted recommendations on ways that VR could improve, including increasing communication and coordination with community partners, businesses, and WIOA partners, increased community presence, and an increased number of counselors in the field. However, customers and caregivers were increasingly more satisfied when asked questions about VR service delivery and timeliness and responsiveness of VR staff. 75% of respondents were happy with how soon they were able to meet with a counselor and apply for services. Additionally, 69% of respondents stated that services received met their needs and of those with a job, nearly 92% indicated their job aligned with their interests, skills, and abilities.

B. INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES AND INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

The VR 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. 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 healthcare were among the top needs identified When asked for ideas on how to better reach these individuals, survey responses show the need for public outreach such as hosting an open house to explain VR services and community partnerships to assist in ensuring a VR presence at job fairs, health fairs, and community events to meet these populations where they may already be visiting.

The CSNA used data obtained in the 2020 ACS one-year experimental data tables at https://www.census.gov/programs-surveys/acs/data/experimental-data/1-year.html to determine accurate information about the racial makeup of citizens in the state of Tennessee.

Label	Tennessee Estimate	Margin of Error
Total:	6,886,833	*****
White alone	5,062,808	+/-16,905
Black or African American alone	1,055,220	+/-11,761
American Indian and Alaska Native alone	22,813	+/-2,191
Asian alone	127,575	+/-4,157
Native Hawaiian and Other Pacific Islander alone	2,396	+/-431
Some other race alone	148,209	+/-13,200
Two or more races	467,812	+/-21,294

For Tennessee, data suggests that regardless of race, individuals with a disability are less likely to be employed. The most recent overall employment rate for individuals with disabilities who were of working age is 35% (up from 33% when the CSNA was completed), while the employment rate of working-age people without disabilities in Tennessee is 74% (down from 77% when the CSNA was completed), illustrating a 39% employment gap (down from a 44% gap in employment rate when the CSNA was completed, a 5% improvement for Tennessee in 2023. https://www.tennesseeworks.org/by-the-numbers

C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND

According to the VR Needs Assessment, VR staff responded that the agency or community partnerships that have been the most beneficial in assisting VR customers to achieve successful employment outcomes were WIOA Partners to include American Job Centers and Adult Education. However, when asked what areas/topics they would like to receive additional training in to better prepare for their job, respondents indicated that WIOA training would be

beneficial. While the WIOA partner response rate to the survey was severely lacking, these state partners indicated that their organization's staff was not well informed, or trained, and do not understand the importance of assistive technology and accommodations for individuals with disabilities, especially in terms of helping individuals to obtain employment in a competitive and integrated setting. Respondents agreed that the Tennessee workforce system works together to create unified policies that work toward successful WIOA implementation but disagreed that the Tennessee workforce system adequately shares relevant data, reporting measures, or works to jointly monitor progress toward outcome-based results. . In addition to VR counseling and guidance, common service needs for individuals co-enrolled as a VR customer and in other programs within the workforce development system include job readiness training, employment services, and business employment consultant services. Specifically for co-enrolled youth, top service needs include self-advocacy training, workplace readiness, and work-based learning experience.

D. YOUTH WITH DISABILITIES, INCLUDING STUDENTS WITH DISABILITIES AND THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES. 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 IDEA.

Another component of the 2022 needs assessment focused on youth and/or students with disabilities and their needs for Pre-Employment Services (Pre-ETS). Based on the statewide assessments conducted with parents of students with disabilities, it was strongly agreed that youth with disabilities need help preparing for the world of work. Across the five areas that Pre-ETS services address, parents agreed their children could greatly benefit from these services; however according to information reported, there was an evident gap in knowledge about the Pre-ETS program. Parents also felt that overall, their children would benefit from the following opportunities:

- learn about the local labor market;
- develop skills through employment in the community;
- talk with employers in the community about job options;
- participate in job shadowing;
- receive job training;
- explore two-year community college and vocation training program options;
- explore four-year college options;
- learn about disability support services available in college.

Tennessee VR coordinates transition services with the state education agency (SEA) and local education agencies (LEAs) through a collaborative process aimed at supporting students with disabilities as they prepare for employment or post-school education. This is accomplished by the following:

- Interagency Agreement: VR and the Tennessee Department of Education (TDOE) recently updated the interagency agreement for the provision of Pre-ETS that outlines

each parties' responsibilities in creating a collaborative approach to providing transition services.

- LEA Contracts: VR contracts with over 50 LEAs for the provision of Pre-ETS, and the contracts specify which transition services are allowable through the VR program, and that transition services required under IDEA are not to be supplanted. The contract also requires coordination in the development of individual education programs (IEP), including transition services.
- Transition Leadership Team: VR and TDOE jointly share the lead in hosting quarterly Transition Leadership Team meetings, as well as leading a team of transition experts and stakeholders at the National Technical Assistance Center on Transition: The Collaborative's (NTACT: C) annual Capacity Building Institute (CBI).
- Data Sharing and Shared Goals: VR and TDOE regularly share programmatic data and outcome data through the Transition Leadership Team and Employment First Task Force and have a shared goal for increasing work-based learning (WBL) for students with disabilities, outlined in the Employment First Task Force's strategic plan which is updated quarterly and is reported annually to the Governor through the Expect Employment report.

Overall, VR coordinates transition services with the SEA and LEAs through a collaborative, person-centered approach that focuses on supporting students with disabilities in achieving their employment and educational goals.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

When services are not provided by VR staff, 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 2021, VR worked with over 100 CRPs and other entities across the state to deliver specialized services to individuals participating in the VR program.

In addition, the state has partnered with Vanderbilt University and the Vanderbilt Kennedy Center to develop a portal on the Transition Tennessee website (https://transitiontn.org/) that focuses specifically on Pre-Employment Transition Services. 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. In addition to having resources for students and families, the Transition Tennessee Pre-ETS Blueprint serves as an online hub for professional development and resources for educators, providers, and other professionals. Each course in the portal features free video modules, downloadable resources, webcasts, and information about upcoming conferences and trainings.

According to the 2022 VR Needs Assessment, VR staff were surveyed about the performance of CRPs and results show there may be a need for more CRPs to provide the needed services for VR customers and that overall, quality services are provided in a timely manner. When VR staff were asked the following questions with answer options of *Strongly Agree, Agree, Disagree, Strongly Disagree* the majority answer for each topic can be conveyed as follows:

- There are enough CRPs to provide the necessary services for VR customers in my geographic location. *Disagree*
- The CRPs that I currently work with meet the needs of VR customers. *Agree*
- The CRPs that I currently work with provide quality services to VR customers. *Agree*
- CRPs are adequately trained and have the skills necessary to meet the needs of VR customers. *Agree*
- The CRPs that I currently work with understand TN VR policies and procedures. *Agree*
- The CRPs that I currently work with have received training from VR /TN Division of Rehabilitation Services staff. *Agree*
- The CRPs that I currently work with are responsive and I am able to reach them in a timely fashion when necessary. *Agree*
- CRPs are timely and accurate in any reporting required of them. *Agree*
- I continue to use the same CRPs because I am confident in the services that they provide. *Agree*
- I will discontinue using a CRP that I have a good relationship with if I believe there is another CRP who provides better quality services that will benefit the VR customer. *Agree*

When CRPs were surveyed about improving service delivery, they indicated a positive working relationship with VR, but noted areas for training that would be beneficial in assisting VR Customers.

1. I believe referrals are fairly distributed from VR.

- Yes 25
- No 17

2. The VR staff that I work with are responsive and I can reach them in a timely fashion when necessary.
    a. Strongly Disagree 1
    b. Disagree 4
    c. Agree 15
    d. Strongly Agree 21
3. In what areas, or on what topics, would your staff most benefit from receiving additional training to be best prepared for assisting VR customers?
    a. Employer needs-recruitment and retention of people with disabilities 23

b. Disability-specific training 15

c. Completion of forms 15

d. Job coaching and/or job development 14

e. Person-centered language and practices 10

f. One-on-One technical assistance (how to simplify forms) 9

g. Others
3

C. GOALS, PRIORITIES, AND STRATEGIES

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of Section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

1. DESCRIBE HOW THE SRC AND THE VR AGENCY JOINTLY DEVELOPED AND AGREED TO THE GOALS AND PRIORITIES AND ANY REVISIONS; AND

VR meets with the SRC on a quarterly basis and engages in additional conversations throughout the year. During these meetings performance outcomes are shared, as well as successes and challenges. Additionally, the SRC consists of a subcommittee specifically dedicated to the CSNA. The subcommittee is responsible for partnering with VR to develop the survey questions, target participants, inform the community about the survey, and determine the distribution methodology. Beginning in January 2021, VR met with the SRC CSNA subcommittee to review previous goals, analyze CSNA results, and to identify goals and priorities on a quarterly basis. On September 15, 2022, the full SRC committee met to hear from VR and the SRC CSNA subcommittee and to discuss the goals and priorities as recommended by VR and the SRC subcommittee. The committee approved the recommendations presented on September 15, 2022.

2. IDENTIFY MEASURABLE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS AND THE BASIS FOR SELECTING THE GOALS AND PRIORITIES (E.G., CSNA, PERFORMANCE ACCOUNTABILITY MEASURES, SRC RECOMMENDATIONS, MONITORING, OTHER INFORMATION). AS REQUIRED IN SECTION 101(A)(15)(D), (18), AND (23), DESCRIBE UNDER EACH GOAL OR PRIORITY, THE STRATEGIES OR METHODS USED TO ACHIEVE THE GOAL OR PRIORITY, INCLUDING AS APPLICABLE, DESCRIPTION OF STRATEGIES OR METHODS THAT—

A. SUPPORT INNOVATION AND EXPANSION ACTIVITIES;

B. OVERCOME BARRIERS TO ACCESSING VR AND SUPPORTED EMPLOYMENT SERVICES;

C. 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, POST-SECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES); AND

D. IMPROVE THE PERFORMANCE OF THE VR AND SUPPORTED EMPLOYMENT PROGRAMS IN ASSISTING INDIVIDUALS WITH DISABILITIES TO ACHIEVE QUALITY EMPLOYMENT OUTCOMES.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

As a result of the 2022 Comprehensive Needs Assessment, the VR program, in collaboration with the SRC, identified specific priorities for focusing energy and resources, and associated actions for VR to take in the upcoming year.

Key Priorities Identified

1. **Talent Management** – This priority was selected to ensure the VR program has qualified knowledgeable and trained workforce serving individuals with disabilities through their employment journey. Staff hiring, training and retention, including addressing adequate compensation to improve recruitment and retention of master's degree holding Vocational Rehabilitation Counselors and other critical VR staff.

    a. Continue to improve and expand training opportunities for staff through the development and deployment of role specific training and ongoing professional learning and development plans.

    b. Incorporate an employee suggestion mechanism that provides an opportunity for employees to share with decision-making leaders, comments and recommendations for an improved workplace.

    c. Develop and create a position dedicated to coordinating training opportunities.

    d. Dedicated training coordinator will be using resources made available through surveys, contracts, shared resources, and staff feedback to develop, track and monitor training and profession development.

    e. To assist with retention the VR program is incorporating Stay Interviews and exploring other options in hiring techniques. Hiring techniques can include virtual career fairs and posting positions on social media platforms.

2. **Communication and Responsiveness** – This priority was selected to develop strong relationships and expand awareness of VR services. Enhance communication and responsiveness within VR and with customers, Community Resource Providers (CRPs), partners, and the public.

    a. Enhance the*Aware* case management system to include a vendor portal, which will allow CRPs to easily submit payment requests, inquiries, and other correspondence to VR in a secure and efficient method and a Pre-ETS provider portal for documenting actual services. (a)

    b. VR is developing a tool to measure the effectiveness of the vendor portal by using surveys and/or reviews of timely service provisions and payments to CRPS.

    c. Implement a modernized, omnichannel customer support model that fields customer inquiries across 4 channels: phone, live chat, email, and web-based

forms. Create a web-based VR referral form so the public can complete and submit a referral to the VR Program for themselves or for someone else. (a)(b)

d. Omnichannel reports are being utilized to track how customers are reaching out to the VR program as well as the reason for contact. This is used to ensure customers are receiving timely and accessible information and responses from the VR Program. This also allows the customer to choose preferred methods of communication.

3. **Customer Engagement** – This priority was selected to focus on engaging customers throughout the VR process to ensure customers are empowered to practice informed choice throughout their person-centered journey with VR and to increase successful employment outcomes for VR customers.

    a. Review online assets including webpages, appearance on partner's websites, social media platforms, and print materials and identify any that need to be updated, modified, removed, or created to assure adequate public and cultural awareness of VR Program, eligibility, and services offered as well as full accessibility. Develop a prioritization of changes identified with action plans, resources needed, and timelines. (a)(b)

    b. Facilitate customer journey mapping exercises that result in a web-based journey mapping tool that outlines the process, timelines, and specific touchpoints throughout the journey to employment to increase customer awareness, understanding, and engagement. (a)(b)

    c. Collaborate and work with workforce partners to create training and employment opportunities for youth with disabilities. VR Program monitors success through case management reviews and employment outcomes.

4. **Community Partners and Resources** – The priority ensures investing time in educating and informing the public, community partners, staff, and customers to ensure communities have a clearer understanding of the services available through Vocational Rehabilitation, and other community agencies.

    a. Develop a public outreach strategy that assures reach and understanding of VR services. Including Pre-Employment transition services as a potential eligible and eligible customer with an individualized plan for employment. (a)(b)

    b. VR Program is gaging the success of methods used to educate customers, providers, and community about VR services through various methods such as surveys, in person vendor forums, and partner meetings.

    c. In partnership with the Department of Mental Health and Substance Abuse Services (DMHSAS), continue to expand the delivery of Individual Placement and Support (IPS) supported employment services with an intentional focus on TN distressed counties. By 2026 reach 95% of all counties in TN through increased CRP IPS services, including all identified distressed counties. (a)(b)(d)

    d. Procure a third-party consultant to help strengthen the relationship between VR and the blindness community and create a strategic plan for improving VR services for individuals with low and no vision.

e. Work with the TN Council for Deaf, Deaf Blind and Hard of Hearing to help strengthen the relationship between VR and the Deaf Community and create a strategy for improving VR services for individuals who are Deaf and Hard of Hearing.

f. The strategic plan identifies objectives and key results that will be completed by workgroups.

g. Make available online VR specific presentations for staff use in Committee, Council, and Board presentations. Update presentations quarterly as needed with relevant performance data.

h. Continue to work with the SRC, Community and Advocates to identify a network of Community Rehabilitation Providers, particularly in rural areas of the state.

i. Regular review of CRP rates to ensure rates are commensurate with quality service provision.

5. **Training –** Continue to enhance opportunities for customer that allow for achievement toward employment goals through IPE development. This can include apprenticeships, internships, counseling on postsecondary opportunities.

    a. Expand youth with disabilities knowledge of in demand careers with labor market information. VR Program collaborates with partners to share open job opportunities to include apprenticeships and career information sessions.

    b. Provide information to encourage CIE through self-employment opportunities. VR Program collaborates with community partners to offer assistance with business plan development and implementation.

In addition to priorities created VR established additional objectives based on various inputs such as the priorities and goals developed through the CSNA in collaboration with the SRC, an assessment of funding availability, review of program performance metrics, and technical assistance received from RSA. These objectives include review and exploration of the following:

- Policy revisions to Financial Need Assessments (FNA)
- Priority category definitions
- Closed priority categories
- Serving individuals in a closed priority category
- Elimination of Order of Selection

Finally, beginning July 1, 2023 the VR program established a customer focused operational goal to increase the number of signed Individualized Plans for Employment (IPE)s by 7% by June 30, 2024.

Through these efforts, the Tennessee Vocational Rehabilitation program, together with our community partners and stakeholders, including the State Rehabilitation Council, are transforming the VR program to better meet the needs of the individuals we serve, the businesses we rely on, and the communities we live in.

D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

1. PROGRESS IN ACHIEVING THE GOALS AND PRIORITIES IDENTIFIED FOR THE VR AND SUPPORTED EMPLOYMENT PROGRAMS;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

- **Key Priority 1 Talent Management:** Progress has been demonstrated in the area of talent management with several priorities being accomplished. First, two modules were added to the TN VR onboarding training curriculum CORE (Connecting Opportunities, Resources, and Education). These modules are specific to the roles and duties of certain positions with a focus on service delivery and customer engagement throughout a customer's VR journey. Additionally, talent management improvements include a new survey available for staff to provide feedback and suggestions for policy, training, professional development, and process improvement. The survey is available anytime and results are pulled monthly with action taken in addressing feedback received and outcomes are communicated to submitters. Finally, to demonstrate VR's commitment to improve talent management, a training coordinator position was created to research, coordinate, and communicate professional development and educational opportunities, and ensure a work environment that helps employees develop their skills, fosters career advancement, and promotes programs and resources.

- **Key Priority 2 Communication and Responsiveness:** To enhance communication and responsiveness, the Aware Vendor Portal was designed, developed and tested, and was launched July 2023. This new portal was designed specifically for vendors and provides secure, remote access to VR's case management system via a web-based interfaced. VR business processes and operational processes have been built around the use of the Aware Vendor Portal, creating a positive impact on process efficiency as well as workflow. Additionally, Pre-ETS actual services will soon be captured in Aware with a targeted go live date of April 2024. Also, a cross-program contact center which fields customer inquiries across multiple supported channels was implemented August 2023. The model supports 4 communication channels: phone, live chat, email and web-based forms. Customers, providers, and partners can reach VR using any of these communication channels. There is now the ability to refer an individual to the VR Program using a web-based form located on the VR website. Referrals can be received by phone, in-person, email, or webforms.

- **Key Priority 3 Customer Engagement** Progress has been made to improve customer engagement. Webpages have been updated to provide customers, providers, and community members information on the purpose of VR and provide information to prepare customers for the VR journey toward competitive integrated employment.

- **Key Priority 4 Community Partners and Resources** have been a priority this year. A third-party consultant completed an assessment and provided guidance in completing a strategic plan to improve services for individuals with low and now vision. Within the strategic plan key results have been identified and implementation of plan will start July 2024. Also, presentations are available to staff when sharing information on the VR program to Committees, Councils, and Boards.

- **Other objectives** identified through technical assistance with maximizing the federal award have resulted in specific services being removed from the list of services requiring FNA, the income level for financial participation being changed from 2009 LIHEAP to 138% above the 2023 federal poverty level, and all individuals in closed priority status being moved to active status to begin receiving VR services. Finally, Order of Selection will be eliminated in early 2024.

2. PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR, REFLECTING ACTUAL AND NEGOTIATED LEVELS OF PERFORMANCE. EXPLAIN ANY DISCREPANCIES IN THE ACTUAL AND NEGOTIATED LEVELS; AND

PY 2022

- MSG Rate – Negotiated Target: 55% / Actual: 57.6%
    - With a rate of 57.6%, the TN VR Program met and exceeded both the negotiated target (55%) and national average (49%). Tennessee made the most progress in the nation, moving from 40th in the fourth quartile to 12th in the first quartile.
- Employment 2nd Quarter After Exit – Negotiated Target: 47% / Actual: 60.2%
    - With a rate of 60.2%, the TN VR Program met and exceeded both the negotiated target (47%) and national average (56%).
- Employment 4th Quarter After Exit – Negotiated Target: 46% / Actual: 54.5%
    - With a rate of 54.5%, the TN VR Program met and exceeded both the negotiated target (46%) and national average (53%).
- Median Earnings – Negotiated Target: $3,950 / Actual: $4,193
    - With a median earnings amount of $4,193, the TN VR Program met and exceeded the negotiated target ($3,950).
- Credential Rate – Negotiated Target: 30% / Actual: 22.5%
    - The TN VR Program did not meet the Credential Rate negotiated target of 30% for PY 2022. The main factor preventing TN DRS from achieving the target is the lack of access to credential information for customers after they exit the VR program. To improve on this metric, TN DRS is developing a Credential Guide for staff to assist with understanding how to capture and report in the case management system. Additionally, TN DRS released an RFI in November 2023 to explore the possibility of contracting with an organization to conduct customer surveys to collect credential information post-exit.

3. THE USE OF FUNDS RESERVED FOR INNOVATION AND EXPANSION ACTIVITIES (SECTIONS 101(A)(18) AND 101(A)(23) OF THE REHABILITATION ACT) (E.G., SRC, SILC).

VR would like to incorporate the use of virtual reality into the customers' options for career exploration activities during Pre-ETS and as an eligible VR student/ customer. Additionally, the VR agency is interested in increasing the use of technology such as virtual reality into employment training opportunities for customers. In partnership with the Department of Mental Health and Substance Abuse Services (DMHSAS) and our network of shared community

providers, VR is dedicated to ensuring all Tennesseans who need services through the Individual Placement and Support (IPS) Supported Employment model have access to these services. Therefore, our goal is to continue to expand the delivery of IPS supported employment services with an intentional focus on TN distressed counties. Additionally, by 2026 we hope to reach 95% of all counties in TN, including all identified distressed counties.

Funding has been used to expand SRC activities such as an annual retreat in addition to quarterly meetings. Quarterly meetings are hosted in different areas of the state with the availability for SRC members to visit local business and LEAs that demonstrate VR partnerships and impact to employment outcomes.

E. SUPPORTED EMPLOYMENT SERVICES, DISTRIBUTION OF TITLE VI FUNDS, AND ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

1. ACCEPTANCE OF TITLE VI FUNDS:

(A) VR agency requests to receive title VI funds.

2. IF THE VR AGENCY HAS ELECTED TO RECEIVE TITLE VI FUNDS, SECTION 606(B)(3) OF THE REHABILITATION ACT REQUIRES VR AGENCIES TO INCLUDE SPECIFIC GOALS AND PRIORITIES WITH RESPECT TO THE DISTRIBUTION OF TITLE VI FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES. DESCRIBE THE USE OF TITLE VI FUNDS AND HOW THEY WILL BE USED IN MEETING THE GOALS AND PRIORITIES OF THE SUPPORTED EMPLOYMENT PROGRAM.

The VR Program assures that funds made available for SE will only be used to provide SE services to individuals who are eligible to receive such services. Currently TN VR utilizes the full amount of title VI funds for supported employment. The goal for the next federal fiscal year if to serve 3,617 for a cost of approximately $6,540,00. The following priorities have been established to support this goal:

1. Expand IPS Services for individuals with disabilities who require supported employment services to include youth and adults.
2. Increasing CRPs across the state to meet the need of individuals with disabilities that require support employment.
3. To increase qualified providers of supported employment services VR program is partnering with DIDD in the development of Employment first and Accreditation Program.

3. SUPPORTED EMPLOYMENT SERVICES MAY BE PROVIDED WITH TITLE 1 OR TITLE VI FUNDS FOLLOWING PLACEMENT OF INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES IN EMPLOYMENT. IN ACCORDANCE WITH SECTION 101(A)(22) AND SECTION 606(B)(3) OF THE REHABILITATION ACT, DESCRIBE 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; AND THE TIMING OF TRANSITION TO EXTENDED SERVICES.

When an individualized plan for employment indicates an employment outcome in a supported employment setting for an individual with a most significant disability, the supported

employment services to be provided by VR is identified and the expected extended services needed, including the source of extended services, is specified.

The IPE provides for periodic monitoring to ensure that the individual is making satisfactory progress toward meeting the weekly work requirement established by the time of transition to extended services. It also provides for the coordination of services when services are available from other Federal or State programs. To the extent that job skills training is provided, VR captures if training is onsite, and placement in an integrated setting for the maximum number of hours possible based on the unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of individuals with the most significant disabilities.

Supported employment services means ongoing support services, that may include customized employment placement services, and other appropriate services needed to support and maintain an individual with a most significant disability, including a youth with a most significant disability, in supported employment that are:

-
    - Organized and made available, singly or in combination, in such a way as to assist an eligible individual to achieve competitive integrated employment;
    - Based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment;
    - Provided for a period of time not to exceed 24 months, unless under special circumstances the eligible individual and the rehabilitation counselor jointly agree to extend the time to achieve the employment outcome identified in the individualized plan for employment; and Following transition, as post-employment services that are unavailable from an extended services provider and that are necessary to maintain or regain the job placement or advance in employment.

The scope of supported employment services may include but is not limited to:

- A consultation meeting with the service provider prior to IPE development to determine the individual's service needs and specific employment objective.
- Career development by the service provider following completion of the IPE and placement services provided in Service Status.
- When warranted, Customized Employment placement services.
- Career stabilization (training) and maintenance (ongoing supports) provided in Service Status and Employed Status by skilled employment specialists and job coaches.
- Other services, beyond routine services, that are required because of the individual's intensive support needs.
- Individual Placement and Support (IPS) for individuals with mental illness.
- Extended services funded by other sources or by VR under certain circumstances for youth no older than age twenty-four (24) to maintain employment stability.

When an individualized plan for employment indicates an employment outcome in a supported employment setting for an individual with a most significant disability, the supported employment services to be provided by VR is identified and the expected extended services

needed, including the source of extended services, is specified. The IPE provides for periodic monitoring to ensure that the individual is making satisfactory progress toward meeting the weekly work requirement established by the time of transition to extended services. It also provides for the coordination of services when services are available from other Federal or State programs. To the extent that job skills training is provided, VR captures if training is onsite, and placement in an integrated setting for the maximum number of hours possible based on the unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of individuals with the most significant disabilities.

4. SECTIONS 101(A)(22) AND 606(B)(4) OF THE REHABILITATION ACT REQUIRE THE VR AGENCY TO DESCRIBE EFFORTS TO IDENTIFY AND ARRANGE, INCLUDING ENTERING INTO COOPERATIVE AGREEMENTS, WITH OTHER STATE AGENCIES AND OTHER APPROPRIATE ENTITIES IN ORDER TO PROVIDE SUPPORTED EMPLOYMENT SERVICES. THE DESCRIPTION MUST INCLUDE EXTENDED SERVICES, AS APPLICABLE, TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THE PROVISION OF EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES IN ACCORDANCE WITH 34 C.F.R. § 363.4(A) AND 34 C.F.R. § 361.5(C)(19)(V).

The VR Program has interagency arrangements and coordination with the following entities for the provision of supported employment services and extended services:

- The Department of Intellectual and Developmental Disabilities refers individuals with intellectual and developmental disabilities (DIDD) to the Vocational Rehabilitation program for Supported Employment Services.
- 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.
- University of Tennessee, Center for Literacy Education and Employment provides staff training, professional development, and consultation services for community supported employment service providers.
- Tennessee's Medicaid program, 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 services as a Medicaid Long Term Service and Support.
- 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.
- 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 VR Program 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 89 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.

F. ANNUAL ESTIMATES

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—

A. VR PROGRAM; AND

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Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
PC1	7,772	7,772	$16,485.865	N/A
PC2	3,214	3,214	$6,818,722	N/A
PC3	28	28	$60,709	N/A
PC4	44	44	$94,704	N/A
TOTAL	**11,058**	**11,058**	**$23,460,000**	

B. SUPPORTED EMPLOYMENT PROGRAM.

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If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
PC1	3,611	3,611	$6,532,000	N/A
PC2	5	5	$8,000	N/A
TOTAL	**3,617**	**3,617**	**$6,540,000**	

G. ORDER OF SELECTION

1. PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES.

* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

The VR agency is not implementing an order of selection and all eligible individuals will be served.

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

A. THE JUSTIFICATION FOR THE ORDER

Tennessee is no longer operating in an order of selection.

B. THE ORDER (PRIORITY CATEGORIES) TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES ENSURING THAT INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

Tennessee is no longer operating in an order of selection.

C. THE VR AGENCY'S GOALS FOR SERVING INDIVIDUALS IN EACH PRIORITY CATEGORY, INCLUDING HOW THE AGENCY WILL ASSIST ELIGIBLE INDIVIDUALS ASSIGNED TO CLOSED PRIORITY CATEGORIES WITH INFORMATION AND REFERRAL, THE METHOD IN WHICH THE VR AGENCY WILL MANAGE WAITING LISTS, AND THE PROJECTED TIMELINES FOR OPENING PRIORITY CATEGORIES. NOTE: PRIORITY CATEGORIES ARE CONSIDERED OPEN WHEN ALL INDIVIDUALS IN THE PRIORITY CATEGORY MAY BE SERVED.

Tennessee is no longer operating in an order of selection.

3. HAS THE VR AGENCY ELECTED TO SERVE ELIGIBLE INDIVIDUALS OUTSIDE OF THE ORDER OF SELECTION WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT?

Tennessee is no longer operating in an order of selection.

H. WAIVER OF STATEWIDENESS.

The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with Section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 C.F.R. § 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."

Not Applicable

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. ANALYSIS OF CURRENT PERSONNEL AND PROJECTED PERSONNEL NEEDS INCLUDING—

A. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;

C. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE VR 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.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Administration	21	22	28
Clerical	63	68	85
Rehabilitation Assistants	8	9	11
Supervisors	82	89	111

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Support	22	27	34
Instructor	19	25	31
VR Direct Client Services	204	258	322
Medical	12	15	18
BEP Specialist/Consultant	12	17	21

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

In PY 2022, a total of 11,703 VR customers were served. This number includes all customers who completed a VR application. These customers were served by a total of 91 counselor positions, 7 of which are currently vacant. The ratio of counselors to clients is 1:139.

E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:

The VR Program is projecting a 25% increase in customers served for a total of 14,629 in 2029. The VR Program will reassess and update the projection in the modification based on the next 2 years of data.

2. DATA AND INFORMATION ON PERSONNEL PREPARATION AND DEVELOPMENT, RECRUITMENT AND RETENTION, AND STAFF DEVELOPMENT, INCLUDING THE FOLLOWING:

A. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM; THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND 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.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
The University of Memphis	Clinical Rehabilitation Counseling	7	5

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates

B. THE VR AGENCY'S PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL, WHICH ADDRESSES THE CURRENT AND PROJECTED NEEDS FOR QUALIFIED PERSONNEL; AND THE COORDINATION AND FACILITATION OF EFFORTS BETWEEN THE VR AGENCY 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.

Within The Department of Human Services, the Division of Rehabilitation works closely with People Operations Learning & Organization Development units. This unit ensure that TDHS can attract, recruit, select, develop, engage, and retain staff. There are specific services provided by HR that includes a new employee orientation, employee relations, employee performance management and other employee-related services. The Learning and Organizational Development team within People Operations plays a vital role in culture of continuous learning, and focusing on enhancing employees 'knowledge, skills, and capabilities. The primary goal is to ensure the employees have the necessary competencies to perform their job effectively, adapt to changing demands, and contribute to the overall success of the organizations. Opportunities for training include leadership development, professional growth, and development. There is a comprehensive online onboarding guide to aid new hires during their first year of employment.

Higher Institutions are notified of open position and assist with the recruitment of counselors which includes individuals with disabilities and individuals who are minorities. Also, external partners, councils and hiring platforms are utilized to recruit for all positions. A few examples of this would be NCSAB, Community Rehabilitation Providers, Universities (handshake), LinkedIn and indeed. To aid in recruitment there are supplemental postings that are more specific to positions and provide information to the mission and vision of the agency.

An entry level position as been created that assist Master level counselors with workloads. This position has created a pipeline to the counselor level position for those that are interested. Job descriptions were reviewed for professional staff as to the needed level of degree and experience were taken into consideration. Duties were updated to reflect the current job role of professional positions.

To aid in the preparation and retention all personal participate in introductory modules (first two modules) DRS CORE (Connecting Opportunities, Resources and Education). CORE offers a series of modules for staff, each increasing knowledge and awareness of the VR program, while always connecting back to the Division's core beliefs. These first two modules offer a broad foundation of VR for all personal, incorporating our transformation into the onboarding, and aligning with and reinforcing the person-centered philosophy. Orientation and Person-Centered thinking are a session where all personal meet program directors and provide an overview of the variety of support options available to our customers. The focus is to demonstrate person-centered thinking in all that we do. The customer journey is a session that focuses on service standards and showing respect for our customer at each touch point on their journey to competitive integrated employment. The remaining Modules are specifically for VR

Counselors, diving into the innerworkings of a VR case and offering training and assistance on how to assist customers in achievement of employment goals. Additional modules have been created that are specific to Pre-Employment Transition Specialist (Pre-ETS) which consist of four self-directed, online modules covering the background of Transition services, the job role of a pre-ETS specialist and the pre-ETS toolbox. Modules to be implemented soon are for Supervisors and Business Services Unit.

In the preparation and retention efforts TN VR looks for ways to enhance the employee's ability to fulfill the Department's mission in Strengthen Tennessee by Strengthening Tennesseans. Personal are encouraged to participate and attend trainings, conferences, and events. Opportunities are provided that enhance the DHS employee's job skills; and prepare staff to evolve in a successful upward progression in their profession.

Within TN DHS is Diversity, Equity, Inclusion and Accessibility Program. The mission of this program is to advance a culture of belonging to unleash potential and become "One Tennessee". With a vision to be the best place to work by creating an environment in which employees thrive. The four key pillars are: Communication, Data Analysis-Planning and Monitoring, Education, and Engagement – internal and External. There are champions selected within each agency to serve on the enterprise Diversity Workgroup. Champions play a central role in disseminating information and developing agency diversity initiatives that align with the enterprise. There is a "This is Me" Campaign. This campaign focus on employees sharing different aspects of their identities and encouraging voluntary self-identification. Also, a State Bill within TN is State as a Model Employer (SAME) and the purpose is to ensure that departments design and proactively implement best, promising, and emerging policy, practices and procedures related to the recruitment, hiring, advancement, and retention of qualified individuals with disabilities.

Ongoing communication is used to promote diversity and facilitate healthy discussion using diversity message. The purpose of diversity messaging is to increase awareness and create a sense of belonging for all employee in the state workforce. A diversity newsletter is available to connect, engage, and understand one another to enhance employees belonging and wellness. Continuously education opportunities are available that offers learning and development opportunities on Diversity.

C. DESCRIPTION OF STAFF DEVELOPMENT POLICIES, PROCEDURES, AND ACTIVITIES THAT ENSURE ALL PERSONNEL EMPLOYED BY THE VR AGENCY RECEIVE APPROPRIATE AND ADEQUATE TRAINING AND CONTINUING EDUCATION FOR PROFESSIONALS AND PARAPROFESSIONALS:

I. 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

II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.

TN VR has implemented specific onboarding and professional development training for all staff. There are modules within CORE that provide direction and guidance to positions as to responsibilities and duties. For VR Counselors, modules are diving into the innerworkings of a

VR case and offering training and assistance on how to assist customers in achievement of employment goals. Additional modules have been created that are specific to Pre-Employment Transition Specialist (Pre-ETS) which consist of four self-directed, online modules covering the background of Transition services, the job role of a pre-ETS specialist and the pre-ETS toolbox. Modules to be implemented soon are for Supervisors and Business Services Unit. Personnel are encouraged to participate and attend trainings, conferences, and events.

TN staff utilize YesLMS, LinkedIn, and HR trainings for onboarding purposes as well as for professional development. Trainings are also available to all staff thru regional/unit meetings, one on one with policy and UTCLEE. TN program has a training coordinator position to ensure all staff have access to training and to provide an intentional focus to training opportunities. Policy coordinators are available to each region to provide policy trainings as request or based on trends that have been identified. Trainings are conducted by webinars and/or recorded online.

For onboarding practices TN has reviewed current practices and will be expanding curriculum for all field positions. The onboarding process will allow sufficient time in training and getting to know the program prior to working independently. With the goal being to increase confidence of new staff in current position as well retain.

There is a strong partnership with the University of Memphis. This has proven to be very beneficial to those counselors who are hired without a degree in Rehabilitation Counseling. There are specifically three virtual courses providing the foundations of Rehabilitation Counseling.

3. DESCRIPTION OF VR AGENCY POLICIES AND PROCEDURES FOR THE ESTABLISHMENT AND MAINTENANCE OF PERSONNEL STANDARDS CONSISTENT WITH SECTION 101(A)(7)(B) TO ENSURE THAT VR AGENCY 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

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.

With the addition of a training coordinator position TN VR has been able to focus on training needs of all staff. This has ensured there is a skill set of assisting individuals with disabilities toward competitive integrated employment. Trainings include are in customer service, medical aspects, ethics, and competitive integrated employment to name a few. The Business Services unit is available to provide trainings on laborer market information and disability etiquette. This past year TN VR has worked to ensure that there is the opportunity for CRC hours to accompany trainings for those who hold this certification.

TN holds an annual ResouceABILITY Fair that allows all staff to learn more about assistive technology with meeting with vendors and getting a hands-on view of new technology. This fair also provides trainings that incorporate how to deliver services that enhances a customer's opportunities for employment. The event is hosted in partnership with the stat's AT Act

Program, the Tennessee Technology Access Program (TTAP). Each year VR staff participate with The Department of Labor with convening sessions held across the state to share labor market information and best practices in serving customers. Staff within the VR program are co located at the American job centers and attend quarterly training on services available at each center as well as updates to the laborer market to their geographic area. The American job centers have a business services unit, and the VR business employment consultant participates with this unit in identifying employment opportunities.

The VR counselor positions requires Graduation from an accredited four-year college or university with a master's degree in Rehabilitation Counseling OR Graduation from an accredited four-year college or university with a master's or completion of a doctoral program in a related field of study with course content that emphasizes rehabilitation, counseling, disability, therapy, health, employment, wellness, or human development. Within 90 days of hire must enroll, at their own expense, in an approved educational plan that will result in the completion of the following courses: Professional Orientation & Ethics in Rehabilitation Counseling, Medical & Psychosocial Aspects of Disabilities, Theories & Techniques of Counseling within thirty-six months from the date of hire. The position of VR Support Coordinator was created for collaboration with VR Counselors. VR Support Coordinators engage with multiple colleagues across disciplines to ensure a successful customer experience. Education and Experience for this position is Graduation from an accredited college or university with a bachelor's degree and one year of full-time professional-level experience in a social science, social service, or related field. The intent is for this position to also create a pipeline for those that are interested in pursuing a degree in Rehabilitation Counseling and wanting to become a VR Counselor.

4. METHOD(S) THE VR AGENCY USES TO ENSURE THAT PERSONNEL 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) takes 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, Linguistica International, or TransPerfect; 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, Linguistica International, or TransPerfect. The Tennessee Language Center is also available for written translation and in person interpretation. 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.

5. 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). 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. As of Jan. 2022, there are eight courses available within the Pre-ETS Blueprint and two more being developed.

- Power of Early Work Experiences
- An Overview of WIOA and Pre-ETS
- Connecting with Employers and Families
- Instruction in Self-Advocacy
- Work-Based Learning
- Job Exploration Counseling
- Developing Strong Partnerships
- Strategies for Effective Instruction
- Workplace Readiness Training (2022)
- Counseling on Postsecondary Education Opportunities (2022)

An ever-evolving student portal has also been created where students can receive free training on tips for going to work or continuing their education. This student can also be leveraged by providers to be used as an instructional tool, complete with resources, handout, notes, and guided lessons.

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 over 500 in January of 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. A virtual option was also provided in 2021, but there is not an option for a Passport to the Future conference in 2022 as part of the TDOEs' Partners in Education Conference, as the conference is no longer occurring. More information about Passport to the Future or other training opportunities can be found here: https://transitiontn.org/conferences.

J. COORDINATION WITH EDUCATION OFFICIALS.

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

1. DESCRIBE PLANS, POLICIES, AND PROCEDURES FOR COORDINATION BETWEEN THE DESIGNATED STATE AGENCY AND EDUCATION OFFICIALS RESPONSIBLE FOR THE PUBLIC EDUCATION OF STUDENTS WITH DISABILITIES, THAT ARE DESIGNED TO FACILITATE THE TRANSITION OF THE STUDENTS WITH DISABILITIES FROM THE RECEIPT OF EDUCATIONAL SERVICES IN SCHOOL TO THE RECEIPT OF VOCATIONAL REHABILITATION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES.

The VR Program 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. In addition, VR staff collaborate to provide information VR sessions to students while in high school who may benefit from further VR services and seek to acquire additional VR referrals through this process.

The VR Program employs 23 Pre-Employment Transition Specialists and four 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 customers and make referrals to the VR Counselor assigned to the school.

As of PY23, there are 23 Pre-Employment Transition Community Rehabilitation Providers and 56 LEAs contracted to provide services.

Transition Tennessee

An important feature that helped to operationalize the interagency agreement between the VR Program and the Department of Education is the continued development 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.

Tennessee VR continues to work with the Vanderbilt Kennedy Center and Transition TN to update and develop new content and resources for Pre-ETS providers. In addition, we are now offering content directly to students to receive Pre-ETS in a self-paced manner or through the use of an instructor led online session. We have now identified and begun training the first model demonstration site that will highlight best practices and to be used as a training resource for other school districts and provider agencies. Lastly, more in-person training for Pre-ETS providers and educators has been identified and planned for upcoming years of the Transition Tennessee contract.

Policy

The VR Program 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. DESCRIBE THE CURRENT STATUS AND SCOPE OF THE FORMAL INTERAGENCY AGREEMENT BETWEEN THE VR AGENCY AND THE STATE EDUCATIONAL AGENCY. CONSISTENT WITH THE REQUIREMENTS OF THE FORMAL INTERAGENCY AGREEMENT PURSUANT TO 34 C.F.R. § 361.22(B), PROVIDE, AT A MINIMUM, THE FOLLOWING INFORMATION ABOUT THE AGREEMENT:

A. CONSULTATION AND TECHNICAL ASSISTANCE, WHICH MAY BE PROVIDED USING ALTERNATIVE MEANS FOR MEETING PARTICIPATION (SUCH AS VIDEO CONFERENCES AND CONFERENCE CALLS), TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND OTHER VOCATIONAL REHABILITATION SERVICES;

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY PERSONNEL FOR STUDENTS WITH DISABILITIES THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS (IEPS) UNDER SECTION 614(D) OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT;

C. THE ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES;

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES.

OUTREACH TO THESE STUDENTS SHOULD OCCUR AS EARLY AS POSSIBLE DURING THE TRANSITION PLANNING PROCESS AND MUST INCLUDE, AT A MINIMUM, A DESCRIPTION OF THE PURPOSE OF THE VOCATIONAL REHABILITATION PROGRAM, ELIGIBILITY REQUIREMENTS, APPLICATION PROCEDURES, AND SCOPE OF SERVICES THAT MAY BE PROVIDED TO ELIGIBLE INDIVIDUALS;

E. COORDINATION NECESSARY TO SATISFY DOCUMENTATION REQUIREMENTS SET FORTH IN 34 C.F.R. PART 397 REGARDING STUDENTS AND YOUTH WITH DISABILITIES WHO ARE SEEKING SUBMINIMUM WAGE EMPLOYMENT; AND

F. ASSURANCE THAT, IN ACCORDANCE WITH 34 C.F.R. § 397.31, NEITHER THE SEA NOR THE LOCAL EDUCATIONAL AGENCY WILL ENTER INTO A CONTRACT OR OTHER ARRANGEMENT WITH AN ENTITY, AS DEFINED IN 34 C.F.R. § 397.5(D), FOR THE PURPOSE OF OPERATING A PROGRAM UNDER WHICH YOUTH WITH A DISABILITY IS ENGAGED IN WORK COMPENSATED AT A SUBMINIMUM WAGE.

A. The VR Program initially signed an exclusive agreement with the Tennessee Department of Education (TDOE) in October 2017 to provide pre-employment transition services (Pre-ETS). This agreement was updated on April 1, 2023. The agreement outlines its purpose, the responsibilities of Vocational Rehabilitation (VR), the responsibilities of the Department of Education (DOE), and shared responsibilities.

In the summers of 2022 and 2023, transition academies were created to provide comprehensive training to school-based transition coordinators, teachers, and Pre-ETS providers. Moreover, there are scheduled training opportunities for the 2023-24 school year, covering transition planning for students with disabilities, including Pre-ETS and VR services. These training sessions will be shared with various transition stakeholders, such as VR staff, Community Rehabilitation Providers (CRPs), and Local Education Agency (LEA) staff. Each year, these training sessions will continue, but will be updated to include relevant content requested by stakeholders. Additionally, as part of the jointly funded project Transition Tennessee, the first Pre-ETS model demonstration site in a Middle Tennessee LEA has been identified.

Tennessee VR employs 23 Pre-Employment Transition Specialists to offer guidance and technical assistance to educational agencies. Each county and local school district has an assigned Pre-ETS Specialist responsible for providing continuous support, coaching, and technical assistance. These specialists also complete ongoing VR referrals to facilitate a seamless transition for potentially eligible students receiving Pre-ETS to VR referral, application, and, if eligible, VR customer status.

Tennessee VR collaborates with the Tennessee DOE in multiple state-level task forces aimed at promoting shared responsibilities and visions for transition planning and services. These groups include, but are not limited to, the TDOE Transition Leadership Team, Employment Roundtable, TennesseeWorks Partnership, and the Governor's Employment First Task Force. Participating in these roles enables Tennessee VR to maintain a strong working relationship at the state level with the state education agency. This results in joint planning for state-level initiatives, consistent messaging to local school districts, and a deeper understanding of the interplay between the two entities.

B. When a student who is eligible based on the Individuals with Disabilities Education Improvement Act (IDEIA) standards reaches the age of fourteen (14), 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 VR Program staff is invited and to the extent possible participates in these IEP meetings.

To ensure each LEA is aware of the involvement VR staff can have on a student and customer's journey, the DSU has ensured each LEA has appropriate coverage from a multitude of VR staff. VR staff are charged with ensuring all schools are visited, in-person or virtual each year, conducting outreach and engagement activities, including, but not limited to job fairs, transition fairs, resource fairs, community events, parent/teacher conferences, and back to school nights.

C & D. A no cost interagency agreement between the Tennessee Department of Education (TDOE) and the Division describes the roles and responsibilities of each to ensure that individuals who are IDEIA eligible and meet the VR Program'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 VR Program, 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 LEAs. While not a comprehensive list, some of the specific responsibilities of the VR Program 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 VR Program 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 TDOEs adopted written policies and guidelines regarding compliance with WIOA including the coordinated provision of Pre-ETS.

Similar to the agreement between the Division and TDOE, the VR Program constructs it 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 a free appropriate public education (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 VR Program is responsible for all costs necessary for eligibility determination and provision of services under an IPE. The VR Program 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 FAPE in the least restrictive environment. A free appropriate public education means regular and special education and related services which:

- Are provided at public expense, under public supervision and direction, and without charge to the parent;
- 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;
- Include preschool, elementary school, and secondary school (including appropriate vocational, career or work experience education); and
- Are provided in conformity with an IEP.

E. In complying with the documentation requirements in 34 CFR 397 for youth with disabilities and with section 511 of the Rehabilitation Act, the VR Program has contracted with the University of Tennessee, Center for Literacy, Education, and Employment (UTCLEE) to coordinate with local education agencies to provide career counseling and information and referral services for youth with disabilities who are seeking subminimum wage employment and including referral information providing self-advocacy, self-determination and peer mentoring training. UTCLEE maintains and submits to VR documentation of services including verification for each youth who was contacted and received the requisite services or who was contacted and refused such services. For youth employed at subminimum wage UTCLEE complies with the requirements to provide the requisite services once every six (6) months for the first year of the eligible youth's employment and annually thereafter for the duration of such employment.

F. To ensure clear understanding and compliance with the subminimum wage provisions of the Workforce Innovation and Opportunity Act (WIOA), the following term has been included in the interagency agreement and all Pre-ETS provider contracts, involving the Division, TDOE, and LEAs: "The Department of Education (DOE) and any Local Education Agency (LEA) in Tennessee are prohibited from engaging with an organization that holds a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of having students with disabilities work at subminimum wages. Both parties are obligated to follow the documentation

requirements outlined in Section 511 of the Workforce Innovation and Opportunity Act (WIOA) when students with disabilities seek subminimum wage employment."

K. COORDINATION WITH EMPLOYERS

In accordance with the requirements in Section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

The Vocational Rehabilitation Business Service Unit (BSU), in collaboration with the VR Community Service Unit, and Pre-ETS staff, 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 Community Service Unit staff or 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 VR team member 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, focusing on outcomes with competitive wages, employer benefit offerings, and alignment of the outcome with the customer stated occupational goal.

The BSU also provides 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 BSU is a resource for consultation and assistance regarding services such as: Work Opportunity Tax Credit, Person-Centered Trainings, Workplace Accessibility, Workplace Accommodations, and more. In 2023, 12 BECs across the state were certified Windmills trainers and approximately 50 Windmills trainings have been provided annually. If a Tennessee employer is facing a challenge regarding the recruitment and retention of individuals with disabilities to their workforce, the BSU will assist in developing customer-centered solutions for that business.

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, in collaboration with the Community Service Unit and the Pre-ETS team, 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 has 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, TRC Smyrna maintains a designated position 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.

The VR Community Service Unit has team members strategically located throughout the state to provide opportunities for engagement with business to identify competitive integrated employment and career exploration opportunities unique to the local communities where the CSU centers are located. CSU services include training, career assessment, and career readiness to prepare individuals for employment. CSU 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. Since the CSU moved from facility-based training to community-based training, there have been 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, the CSU has local Advisory Boards which consists of members of the local community (business leaders, representatives from the local education agency, civic leaders, non-profit members etc.) The area managers can leverage these relationships to spread the word about VR, and the training and support services available in the CSU that lead to competitive integrated employment for VR customers.

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 and Community Service Unit, which helps Pre-ETS staff and students coordinate with employers by utilizing business relationships that the BSU and CSU have developed in order to achieve specific goals reliant on partnerships with the business community. BSU and CSU staff 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. BSU and SCU teams 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:

- Erlanger and BlueCross BlueShield – Hamilton County Schools
- Embassy Suites – Rutherford County Schools
- Embassy Suites – Metro Nashville Public Schools
- Le Bonheur Children's Hospital – Shelby County Schools
- Hilton Airport Hotel – Blount County Schools
- Methodist North Hospital – Shelby County Schools
- Parkwest Medical Center – Knox County Schools
- Nike Distribution Center – Shelby County Schools
- Tennova – Clarksville-Montgomery County Schools
- The Peabody – Shelby County Schools
- Welch College – Sumner County Schools
- West TN Healthcare – Jackson-Madison County Schools
- Wilderness in the Smokies – Sevier County Schools

For the student-intern cohort years of 2021-22, 2022-23, and 2023-24, there have been 279 students enrolled in one of the 14 transition-model Project SEARCH programs. For the 2021-22 intern cohort, 84 students enrolled in Project SEARCH and 70 completed the program. Of those 70 graduates, 65 interns had job records, which was a 93% employment rate and 87% met the Project SEARCH employment criteria for competitive, integrated employment. For the 2022-23 intern cohort, 101 students enrolled, and 73 interns have been reported as completing the program. As of November of 2023, 58 graduates currently have a job record. Project SEARCH sites have until February of the following year to enter their outcome data, so this number will continue to rise. The 2023-24 intern cohort is currently actively in the Project SEARCH program with 94 students entering the program. For the most recent complete intern cohort data form 2021-22, out of the 48 states and 10 countries who provide Project SEARCH programs, Tennessee ranks in the top 5. Over the past decade, Project SEARCH has proven to be one of the VR programs more successfully job training programs with 647 completed the program and 85% securing employment.

Since September 2015 through May 2021, a total of 382 students have enrolled in the Project SEARCH® Program. The Project SEARCH® Program has a success rate of 92%, with 353 out of 382 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 during the 2021-12 school year has 65 interns participating in the program. Project SEARCH® has proven to be one of TN VR's more successful job training programs, with a >75% employment rate.

L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

In accordance with the requirements in Section 101(a)(11)(C) and (K), 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 to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

1. STATE PROGRAMS (DESIGNATE LEAD AGENCY(IES) AND IMPLEMENTING ENTITY(IES)) CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

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.

The TTAP Executive Director assists with management of the contracted statewide assistive technology services provider for VR customers. The contracted VR assistive technology partner is also one of the TTAP partners. This along with the close connection to the other TTAP partner allows for easy access to devices, support, and information. The relationships enhance the expertise and amount of assistive technology devices available for VR customers. Loaner devices may be provided to VR customers when available to assist with training or employment needs while awaiting approval and arrival of equipment purchased by VR. Through the reutilization program, VR customers may receive assistive technology devices for permanent use at no cost when items meeting their needs are available. Items provided through the reutilization program can extend to devices beyond those specific to employment tasks, such as durable medical equipment. While all areas of assistive technology needs and interest may not fall within the scope of employment goals, VR customers can engage with TTAP partners for demonstrations related to all areas of life. TTAP assists customers in locating potential funding sources for assistive technology devices and services that may not fall within the realm of VR services. The TTAP Director lends expertise to aspects of the Vehicle Modification process for VR. The Director collaborates with the customer, VR Counselor, and vendor in ensuring services provided meet the customer's employment needs.

2. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

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.

3. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH;

Tennessee Works for employment partnerships and collaborative efforts to increase access to meaningful work and internet-based information for students with disabilities.

4. STATE USE CONTRACTING PROGRAMS;

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.

5. STATE AGENCY RESPONSIBLE FOR ADMINISTERING THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT (42 U.S.C. 1396 ET SEQ.);

Tennessee Department of Finance and Administration, Division of TennCare.

6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;

The Department of Intellectual and Developmental Disabilities (DIDD) refers individuals with intellectual and developmental disabilities to the Vocational Rehabilitation program.

7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

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.

8. OTHER FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS OUTSIDE THE WORKFORCE DEVELOPMENT SYSTEM.

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. University of Tennessee, Center for Literacy Education and Employment provides staff training and development and consultation services for community supported employment service providers.

9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.

Statewide Independent Living Council to advance advocacy and independence for Tennesseans with disabilities by collaborating with all interested parties. 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.

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, 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 VR agency must select the "Edit" button to review and agree to the VR State plan Assurances.

The State Plan must 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

The State Plan must include
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 State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:
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. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
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. as applicable, 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.
3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
3.h. the requirements 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

The State Plan must include
expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).
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)(E) 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 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 or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
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 the requirements for the development of an individualized plan for employment in accordance with section 102(b) 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 sections 101(a)(14) and 511 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.A. strategies to address the needs identified in the assessments; and
4.j.i.B. 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

The State Plan must include
4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113).
4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5. Program Administration for the Supported Employment Title VI Supplement to the State plan:
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.
6. Financial Administration of the Supported Employment Program (Title VI):
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)(H) and (I) 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:
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 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 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)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met?
Yes

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 TITLE IV OF WIOA[1], AND ITS STATE PLAN SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT;

[1] Public Law 113-128.

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Tennessee Division of Rehabilitation Services

2. IN THE EVENT THE DESIGNATED STATE AGENCY IS NOT PRIMARILY CONCERNED WITH VOCATIONAL AND OTHER REHABILITATION OF INDIVIDUALS WITH DISABILITIES, THE DESIGNATED STATE AGENCY MUST INCLUDE A DESIGNATED STATE UNIT FOR THE VR PROGRAM (SECTION 101(A)(2)(B)(II) OF THE REHABILITATION ACT). AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (DESIGNATED STATE AGENCY OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT)[2]AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[3], THE REHABILITATION ACT, 34 CFR 361.13(B) AND (C), AND ALL APPLICABLE REGULATIONS[4], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE TO STATES UNDER SECTION 111(A) 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;

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] 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.

[4] 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 at 34 C.F.R. part 361.

ENTER THE NAME OF DESIGNATED STATE AGENCY

Tennessee 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, OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT, AGREES TO OPERATE AND IS RESPONSIBLE FOR THE

ADMINISTRATION OF THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[5], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[6], 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;

[5] 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.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

4. THE DESIGNATED STATE UNIT OR, IF NOT APPLICABLE, THE DESIGNATED STATE AGENCY 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 AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE VR PROGRAM IN ACCORDANCE WITH 34 CFR 361.13(B) AND (C);

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

Kevin R. Wright, Assistant Commissioner

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

Kevin R. Wright, Assistant Commissioner

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

[1] Public Law 113-128.

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] 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.

[4] 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 at 34 C.F.R. part 361.

[5] 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.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

CERTIFICATION SIGNATURE

To review and complete the Certification section of the VR portion of the State plan, please select the "Edit" button.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Signatory information	Enter Signatory information in this column
Name of Signatory	Kevin R. Wright
Title of Signatory	Assistant Commissioner
Date Signed	03/04/2024

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the

negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	65.0%	65.0%	67.0%	67.0%
Employment (Fourth Quarter After Exit)	59.0%	59.0%	61.0%	61.0%
Median Earnings (Second Quarter After Exit)	$4,400	$4,400	$4,488	$4,488
Credential Attainment Rate	25.0%	30.0%	27.0%	32.0%
Measurable Skill Gains	63.0%	63.0%	65.0%	65.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - VOCATIONAL REHABILITATION

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

• Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.

• Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.

• Applicants are not required to have mission statements or policies that align with equity to apply.

• Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.

• Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

The following policies ensure equitable access to, and equitable participation in the Vocational Rehabilitation Program:

DHS Policy 1.04 Effective: November 15, 2019

- 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 its 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 purpose of this policy is to ensure meaningful communication with persons that experience Limited English Proficiency and their authorized representatives. This policy also provides for communication of information contained in vital documents, including but not limited to, applications for benefits, client release forms, and civil rights complaint forms. AVAZA Interpreter services are used for LEP needs available online for all employees is the language identifier tool and Step-by-Step Guide to Accessing AVAZA Interpreter Services.

DHS Policy 1.05 Effective: February 1, 2019

- The Tennessee Department of Human Services (TDHS) will adhere to all applicable federal and state laws, regulations, and guidelines with respect to making reasonable modifications in policies, practices, or procedures, as necessary, to afford individuals with disabilities an equal opportunity to participate in Department programs and services. The Tennessee Department of Human Services (TDHS) recognizes that in order to have equally effective opportunities and access to benefits, individuals with disabilities may need reasonable modifications to policies and procedures. The purpose of this policy is to provide procedures and guidelines to ensure that TDHS allows for equal and effective opportunities and access to Department programs, services, and activities to all members of the public with disabilities.

Contracts

- Nondiscrimination. The Grantee hereby agrees, warrants, and assures that no person shall be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination in the performance of this Grant Contract of in the employment practices of the Grantee on the grounds of handicap or disability, age, race, color, religion, sex, national origin, or any other classification protected by federal, Tennessee state constitutional, or statutory law. The Grantee shall, upon request, show proof of nondiscrimination and shall post in conspicuous places.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of*

Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

Economic disadvantage, gender, race, ethnicity, color, national origin, veteran status, disability, age, language, education, rural status, homeless status, housing insecurity, pregnancy, weight, sexual orientation.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

Understand what barriers exist and their prevalence. Determine and implement possible mitigators for highest occurring barriers. Increase cultural competence and response of employees and providers.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

Increase cultural competence and response of employees and providers through training and resource sharing. Begin within the next year.

Conduct surveys, meet with advocacy groups representing underserved populations, and hold focus group meetings to understand what barriers exist and their prevalence. Begin within the next 1-2 years.

Determine and implement possible mitigators for highest occurring barriers. Begin within first year following data and information gathering.

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - SUPPORTED EMPLOYMENT

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

• Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.

• Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.

• Applicants are not required to have mission statements or policies that align with equity to apply.

• Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.

• Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

The following policies ensure equitable access to, and equitable participation in Supported Employment:

DHS Policy 1.04 Effective: November 15, 2019

- 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 its 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 purpose of this policy is to ensure meaningful communication with persons that experience Limited English Proficiency and their authorized representatives. This policy also provides for communication of information contained in vital documents, including but not limited to, applications for benefits, client release forms, and civil rights complaint forms. AVAZA Interpreter services are used for LEP needs available online for all employees is the language identifier tool and Step-by-Step Guide to Accessing AVAZA Interpreter Services.

DHS Policy 1.05 Effective: February 1, 2019

- The Tennessee Department of Human Services (TDHS) will adhere to all applicable federal and state laws, regulations, and guidelines with respect to making reasonable modifications in policies, practices, or procedures, as necessary, to afford individuals with disabilities an equal opportunity to participate in Department programs and services. The Tennessee Department of Human Services (TDHS) recognizes that in order to have equally effective opportunities and access to benefits, individuals with

disabilities may need reasonable modifications to policies and procedures. The purpose of this policy is to provide procedures and guidelines to ensure that TDHS allows for equal and effective opportunities and access to Department programs, services, and activities to all members of the public with disabilities.

Contracts

- Nondiscrimination. The Grantee hereby agrees, warrants, and assures that no person shall be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination in the performance of this Grant Contract or in the employment practices of the Grantee on the ground of handicap or disability, age, race, color, religion, sex, national origin, or any other classification protected by federal, Tennessee state constitutional, or statutory law. The Grantee shall, upon request, show proof of nondiscrimination and shall post in conspicuous places.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

Economic disadvantage, gender, race, ethnicity, color, national origin, veteran status, disability, age, language, education, rural status, homeless status, housing insecurity, pregnancy, weight, sexual orientation.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

Understand what barriers exist and their prevalence. Determine and implement possible mitigators for highest occurring barriers. Increase cultural competence and response of employees and providers.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

Increase cultural competence and response of employees and providers through training and resource sharing. Begin within the next year.

Conduct surveys, meet with advocacy groups representing underserved populations, and hold focus group meetings to understand what barriers exist and their prevalence. Begin within the next 1-2 years.

Determine and implement possible mitigators for highest occurring barriers. Begin within first year following data and information gathering.

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 conformity 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.

This plan shall become effective July 1, 2024.

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 annually 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 a minimum of thirty (30) hours a week of countable work or training activities.

Transitional Cash Assistance (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 childcare). 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;
- Adult Education (education directly related to employment); and
- 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 is limited to three (3) months in a calendar year, with some exceptions.

Effective July 1, 2019, the State aligned the workforce services and support areas with the Tennessee Department of Labor and Workforce Development and the Tennessee Department of Economic and Community Development into nine (9) regional areas that cover all ninety-five (95) counties across the State. Effective July 1, 2023, the State no longer utilizes a contracted partner to provide workforce services, but instead utilized TDHS TANF Case Managers (TCM). After Eligibility is determined by the TDHS Eligibility Counselor, a referral is sent to the TCMS to complete an orientation with the customer. The TCM explains the work requirements and develops a Personal Responsibility Plan (PRP) with the customer. The TCM completes an assessment and works with the customer to develop an Individual Opportunity Plan (IOP). The IOP outlines the individuals' specific work activities according to federally countable work activities and identifies supportive services, if needed. Although the work activities are now being managed by TDHS staff, TDHS continues to utilize an approved contractor to disperse supportive services to eligible customers. Families First/TANF customers 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. Families First customers are required to engage in work activities after twenty-four (24) months of cash assistance, if they are not already engaged. 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; or
- 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

Families First/TANF employs the following strategies to ensure customers 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. This framework is consistently applied when engaging our customers in all aspects of case management and service delivery.
- Families First/TANF customers will have goal-oriented time-limited Individual Opportunity Plan (IOP) that carry them through logical and productive steps to self-sufficiency;
- Sanctions will be imposed when a family fails to comply with the IOP without good cause;
- Cash benefits will be limited to sixty (60) months of eligibility in a lifetime, with some limited exceptions; and
- Families First/TANF customers who become employed and lose cash benefits may qualify to receive transitional childcare assistance, transitional cash assistance, and/or transitional Supplemental Nutrition Assistance Program (SNAP) benefits.

Once the goals are established and the customer is assigned to work or work-related activities that support those goals, TDHS TCM will ensure that customers receive the appropriate services while the customer is in the program. Although the Families First/TANF program does not establish a target goal set for transitioning customers off of assistance, the TCM will work with the customer 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 is not exempt and who is not employed to participate in community service activity. The State plan requires all non-exempt Families First/TANF customers to have an Individual Opportunity Plan (IOP).

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; and

- Be working at least thirty (30) hours per week (OR a combined fifty-five (55) hours for two- parent households receiving federally funded childcare.

Note: TCA is an incentive to the Families First/TANF households designed to address the fiscal cliff families often encounter. TCA differs from Families First/TANF when 100% of the earned income is excluded for six months which allows the household to continue receiving cash assistance.

TCA Work Requirements/Sanctions:

The AU will be monitored by the TCM 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 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 childcare, transportation, as well as other supportive services facilitated by the approved supportive services contractor.

Once the TCA period ends, the customer may be eligible to receive eighteen (18) months of transitional childcare.

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, childcare, 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 childcare.

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 Individual Opportunity Plan (IOP) activities without good cause, which is determined by TDHS.

Other Policies

Families First/TANF AUs have access to childcare. 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 childcare in order to comply with the program's work requirements. In addition, customers who are exempt from a work requirement but wish to volunteer for work/training activities may have access to childcare. There is no co-pay fee for childcare.

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) customers 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.

Other Programs

Two Generational and Community Grant Programs

The Tennessee Department of Human Services (TDHS) fosters a Two-Generation (2Gen) Approach to address poverty from a whole-family centered approach that focuses equally and intentionally on services and opportunities for the child and the caregiver in their lives. This approach builds on four (4) components (i.e., education: early childhood and postsecondary, economic assets, health and well-being, social capital) to create a legacy of economic security that can positively impact the next generation and those to follow. Specifically, TDHS is committed to working with internal and external partners to provide coordinated services and

achieve the following goals: (1) Focus on reducing poverty among children and families using a 2Gen Approach; (2) Cross-agency collaborations that promote 2Gen partnerships and systems change at the state level; (3) Create effective pathways to economic opportunity, including access to mainstream education, training and individualized services for those with barriers to employment; (4) Provide training that promotes a 2Gen approach and help human services staff at all levels of the department serve families more effectively and efficiently; (5) Ensure that families have access to economic and social supports to support upward mobility, while also assuring healthy child development; (6) Help families build social capital that can support both resilience and upward mobility; and (7) Engage and listen to the voices of the families.

In 2014, DHS adopted the 2Gen Approach, which affords DHS the opportunity to be innovative and increase community collaboration in a way that moves children and their parent/caregiver towards educational success, economic stability, strong social capital, and health and well-being. Through this foundational framework, the Department has established several community and state government partnerships across Tennessee to deliver services in a manner that improves economic security and well-being for low-income families. The 2Gen and Community Grant partnerships promotes one or more of the four statutory purposes of the TANF program, and 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.

The TDHS' 2Gen and Community Grant programs collectively offer a myriad of health and human services and/or family economic stability services directly or through referral linkage. Services include:

- Non-medical, wraparound substance abuse and mental health resources to those individuals experiencing and families impacted by opioid addition/crisis;
- Increase the provision of early-intervention home visiting services and supports to mother at pregnancy or at birth, up to age five of the child to improve the health, development, and well-being of children and parent;
- Legal Counseling to assist the families with any immediate civil legal issues such as existing family law issues (i.e., child support and alimony arrangements, violence in the home). Identification of special education issues that households are facing and provide in-school advocacy to increase services to children. Legal education sessions/workshops to increase advocacy skills. Screening for eligibility for Social Security disability or SSI benefits;
- Early steps to school success by providing parents with support groups, resources, and knowledge to support their children and fosters strong home/school connections to ensure a smooth transition to school. Provide social emotional enhancements to both families and children on handling toxic stress to reduce ACE's; therefore, decreasing psychological distress by improving health and wellbeing.
- Employment training, life skills classes, parenting skills, enrollment in post-secondary opportunities, transportation assistance, enrollment in career certificate programs for training and development, employment opportunities, GED/HISET services, financial planning and management skills, and housing support prevention intervention services; and

- Comprehensive case management to connect families to childcare, financial support, job training, transportation, nutrition services, and other social services.

Non-Custodial Programs

Child Support has been determined to be an important foundation in assisting families achieve self- sufficiency and preventing them from relying on additional government assistance. In October 2018, Tennessee established partnerships throughout the State with agencies to assist non-custodial parents' ability to find employment and pay their child support obligations. These partnerships are geared to improving the parenting and communication skills of non-custodians by allowing them to become a greater part of their child's life. Some of the services provided are access to visitation, assisting noncustodial parents re-entering the workforce, assisting parents who cannot pay child support find employment, and other family centered services.

Eligibility:

For a family receiving services through either of these programs, they must meet the State's low- income eligibility criteria. A family is defined as a parent/legal guardian with child(ren) under the age of 18. "Low-Income Families" means families living at or below the Federal Poverty Level, are eligible for Medicaid; are recipient of or eligible for public benefits such as Families First or Supplemental Nutrition Assistance Program (SNAP); unemployed or zero income verification; live in Section 8 housing or low rent public housing; or eligible for National School Lunch Program: free or reduced lunch.

Pregnant women who are in their third (3rd) trimester are eligible to participate and receive services under these programs.

Minor parents who meet the above eligibility requirements are eligible to participate and receive services under these programs.

Family Focused Solutions

Family Focused Solutions (FFS) provides short term counseling services such as mental health services and non-medical substance use treatment services to family members with barriers to employment and self-sufficiency.

Emergency Cash Assistance

Effective March 2020, the state may elect to operate an Emergency Cash Assistance (ECA) program in the event of a state and/or federal emergency declaration as a result of natural disaster or public health emergency. This benefit will be available for current TANF participants as well as non-TANF participants.

Eligibility for ECA due to natural disasters:

- Applicant must live and/or work in the area declared a disaster;
- Families must include a dependent child under the age of eighteen (18) or a pregnant woman (regardless of trimester);
- The applicant must be a resident of Tennessee;
- The applicant and household members must have valid social security numbers;
- The applicant's resources must not exceed $2,000 (this can be waived at the state's discretion depending on severity of disaster);

- Applicant must be unable to live in the home due to the disaster, or the home requires significant repairs, or work in place of employment due to damage/destruction; and
- Other eligibility factors dependent on the nature of the emergency determined by the Department (Examples: residency and verification requirements).

Eligibility for ECA due to public health emergency:

- Applicant must live in the area affected by the public health emergency;
- Families must include a dependent child under the age of eighteen (18) or a pregnant woman (regardless of trimester);
- The applicant must be a resident of Tennessee;
- The applicant and household members must have valid social security numbers;
- The applicant's resources must not exceed $2,000 (This can be waived at the state's discretion depending on severity of emergency); and
- Applicant must experience a temporarily loss of income or reduction in hours by at least 50% due to the public health emergency; and other eligibility factors dependent on the emergency as determined by the Department.

Additional ECA requirements:

ECA will be short term benefits, not to exceed four (4) months.

The applicant's gross household income must not exceed 85% of the State's median income. The sixty (60) month time limit will not apply to applicants of ECA.

The 30-hour work requirement will not apply to applicants of ECA.

Child support cooperation is not a requirement for those eligible for ECA.

The standard allotment amount for household sizes will be determined based on the availability of funds, and benefits will be made available to families via the Electronic Benefit Card (EBT).

Families who are participating in the TANF program are eligible for ECA, however, they must continue to meet the eligibility requirements stated in sections A and B of this plan to remain open for TANF.

All Emergency Cash Assistance applicants receive information that explains the right to Appeal and to a Fair Hearing as described in section K of the plan.

One-Time Cash Payments:

The State may elect to issue an extra one-time cash payment to families receiving Families First/TANF to assist customers in overcoming temporary hurdles. These payments will be distributed to customers, as determined by TDHS. The one-time cash payment will be added to the customers' existing Electronic Benefit Transfer (EBT) card.

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 customers 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. "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)

The Department is actively working to procure an online training program in a video format to upload on our departmental website. This training program will be available to the general public and utilized to train our staff, TANF partners, and customers to address the problem of statutory rape and teen pregnancy prevention. Local TDHS offices will continue to provide printed material regarding statutory rape, displayed in TDHS offices, until such program is

made available. Printed materials will be made available to; contracted agencies, local schools, and in other prominent public places to include law enforcement officials, and relevant counseling services. The Department requires all Family Assistance staff to report knowledge of possible statutory rape and 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 customer or caretaker receiving TANF assistance that participates or allows another to use the customer'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 benefit 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 customer 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 customer'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' Office of Inspector General (OIG) contacts the Tennessee Alcohol Beverage Commission and obtains 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, OIG initially contacted each County Sheriff Department across the state to identify the name and location of any adult cabaret business known in that county. OIG 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' OIG 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, Section 71-3-126, 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' OIG works with the Business Intelligence Unit, a division within Finance and Administration 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 OIG. TDHS' OIG investigates locations and recipients that are identified on the quarterly reports. Once investigated, the TDHS' OIG will determine and establish claims in the amount of cash assistance accessed in a restricted location for customers that have received benefits in a restricted location per State law. TDHS' OIG may also assess 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 OIG Division with ATM location details. Based on that information, the OIG 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 OIG will then notify the TANF Program Director concerning locations where a customer may not have adequate access to their cash assistance.

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)

The Tennessee EBT Cash Access Location Report is available on the Department's website (TN_locations.pdf). This report provides POS locations throughout the State of Tennessee with and without surcharge fees.

If determined needed, the DHS TANF team, along with OIG, will work with businesses in order to purchase POS systems that will be able to be used by customers without being charged a surcharge fee.

The customer 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. The EBT brochure list the website to access the EBT account information. This website has a section titled "Program Material", that provides the link for the TDHS TANF page.

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
- Afghan Humanitarian Parolee admitted under Section 2502 of the Afghanistan Supplemental Appropriations Act, 2022 (Public Law 117-43) effective 9/30/21
- 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.
- Ukrainian Humanitarian Parolee admitted under the Ukraine Supplemental Appropriations Act, 2022 (P.L. 117-128)

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 the administrative appeal process.

Appeals are handled by TDHS' Appeals and Hearings Division, an entity whose sole purpose is to ensure applicants and recipients receive their constitutionally required due process. The Division's function is to determine whether the correct action was taken on a case when that action has adversely affected an applicant or recipient. Any applicant for, or recipient of, Families First/TANF may file an appeal through the county office, district office, State Office, our OneDHS call center, or online via our OneDHS Customer Portal. Every applicant/recipient is informed of his/her right to appeal any administrative action and/or lack of administrative action by DHS. Anyone who applies or wants to apply for Families First/TANF cash assistance is given information that explains the right to an appeal and to a Fair Hearing, the method(s) by which a hearing may be obtained, and that he/she may be represented by a household member or a representative during the appeal process. Furthermore, all applicants/recipients are informed about these rights in each communication of administrative action that is issued to applicants or customers by TDHS.

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 customers 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 TANF Case Managers will assist some Families First/TANF customers 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, Pre-K services, 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.

The list of current MOE funded services is below:

- Child Support Pass-through – If child support is collected for a month in which a family receives cash assistance, the family can receive child support pass-through payments up to the amount of their unmet need. Families receiving cash assistance may be eligible to receive a child support pass-through if:
    - Child support was collected for one or more of the eligible children for the month of assistance.
    - The family had an unmet need (the difference between the standard of need and the sum of the cash grant and the net income of the family)
    - Please refer to Section (c) "Eligibility.
- Pre-K Services – Funds are transferred to the Department of Education to apply to Pre-K services. This program provides early childhood services to low-income families. See section (c) for "low income" definition.

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 customers, 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 customers, 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 private sector organizations (section 402(a)(4) of the Social Security Act)—	
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	Yes

The State Plan must include	Include
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);	
6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—	
6. (A) screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;	Yes
6. (B) refer such individuals to counseling and supportive services; and	Yes
6. (C) 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 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 (section 402(a)(7) of the Social Security Act).	Yes
7 Establish and enforce standards and procedures to*—	
7. (A) ensure that applicants and potential applicants for assistance under the state program funded under this part are notified of assistance made available by the state to victims of sexual harassment and survivors of domestic violence, sexual assault, or stalking;	Yes
7. (B) ensure that case workers and other agency personnel responsible for administering the state program funded under this part are trained in—	
7. (B) 1. the nature and dynamics of sexual harassment and domestic violence, sexual assault, and stalking;	Yes

The State Plan must include	Include
7. (B) 2. state standards and procedures relating to the prevention of, and assistance for, individuals who are victims of sexual harassment or survivors of domestic violence, sexual assault, or stalking; and	Yes
7. (B) 3. methods of ascertaining and ensuring the confidentiality of personal information and documentation related to applicants for assistance and their children who have provided notice about their experiences of sexual harassment, domestic violence, sexual assault, or stalking; and	Yes
7. (C) ensure that, if a state has elected to establish and enforce standards and procedures regarding the screening for, and identification of, domestic violence, sexual assault, or stalking pursuant to paragraph (7)—	
7. (C) 1. the state program funded under this part provides information about the options under this part to current and potential beneficiaries; and	Yes
7. (C) 2. case workers and other agency personnel responsible for administering the state programs funder under this part are provided with training regarding state standards and procedures pursuant to paragraph (7).	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)))

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. IF A STATE AGENCY PLANS TO OFFER SUPERVISED JOB SEARCH IN ACCORDANCE WITH PARAGRAPH (E)(2)(I) OF THIS SECTION, THE STATE AGENCY MUST ALSO INCLUDE IN THE E&T PLAN A SUMMARY OF THE STATE GUIDELINES IMPLEMENTING SUPERVISED JOB SEARCH. THIS SUMMARY OF THE STATE GUIDELINES, AT A MINIMUM, MUST DESCRIBE: THE CRITERIA USED BY THE STATE AGENCY TO APPROVE LOCATIONS FOR SUPERVISED JOB SEARCH, AN EXPLANATION OF WHY THOSE CRITERIA WERE CHOSEN, AND HOW THE SUPERVISED JOB SEARCH COMPONENT MEETS THE REQUIREMENTS TO DIRECTLY SUPERVISE THE ACTIVITIES OF PARTICIPANTS AND TRACK THE TIMING AND ACTIVITIES OF PARTICIPANTS;

Job Search Training (JST) Component

Description of the component	This component helps participants develop and/or enhance skills needed to gain employment via instruction, guidance, and/or mentoring. Approved activities include case management to reduce employment barriers, job skills assessments, career coaching, job search techniques, training on utilizing technology during job search, online job search training, resumé writing workshops and/or assistance, application assistance, interview skills workshops and/or practice sessions, assistance with appropriate dress, social skills-building, training on effective networking, job placement referrals and/or assistance, and other approved job search training activities offered within One-Stop American Job Centers and by third-party partners (TPPs). During each participant's initial assessment, at least three activities are outlined and documented in the JST activity document. Approved JST activities are thoroughly evaluated and must directly enhance participants' employability. JST is not intended to be a long-term activity. This component usually includes three activities and is targeted for completion within 4 - 6 weeks.
Target population	All SNAP E&T participants for whom skills deficiencies are identified during the initial assessment and/or those who express a lack of skills necessary to gain employment are referred to JST. Participants who do not want to engage in specific education and/or training but need assistance with gaining employment are also referred to JST.
Criteria for participation	Participants must demonstrate significant employment barriers and/or express interest in

Description of the component	This component helps participants develop and/or enhance skills needed to gain employment via instruction, guidance, and/or mentoring. Approved activities include case management to reduce employment barriers, job skills assessments, career coaching, job search techniques, training on utilizing technology during job search, online job search training, resumé writing workshops and/or assistance, application assistance, interview skills workshops and/or practice sessions, assistance with appropriate dress, social skills-building, training on effective networking, job placement referrals and/or assistance, and other approved job search training activities offered within One-Stop American Job Centers and by third-party partners (TPPs). During each participant's initial assessment, at least three activities are outlined and documented in the JST activity document. Approved JST activities are thoroughly evaluated and must directly enhance participants' employability. JST is not intended to be a long-term activity. This component usually includes three activities and is targeted for completion within 4 - 6 weeks.
	enhancing their skills to gain employment. Information about each participant's abilities, knowledge, skills, and/or needs is gathered during the participant's initial assessment and through ongoing case management. This information is used to determine appropriateness of participation in this component.
Geographic area	Statewide
E&T providers	TDLWD, WIOA, TPP, and/or State-approved vendors or providers
Projected annual participation	3,380
Estimated annual component costs	$ 168,087.40 ($49.73 per participant)

Job Retention (JR) Component

Description of the component	
Target population	SNAP E&T participants who gain and/or improve employment status through participation in SNAP E&T activities and/or services.

Description of the component	
Criteria for participation	Participants who gain new employment through participation in another component and/or receive other SNAP E&T employment and/or training services are potentially eligible for JR. Participants must receive SNAP benefits during the month of/during the month prior to enrollment in JR. Ongoing case management and confirmation of JR eligibility from TDHS staff are used to determine appropriateness of participation in this component.
Geographic area	Statewide
E&T providers	TDLWD, WIOA, TPP, and/or State-approved vendors or providers
Projected annual participation	280
Estimated annual component costs	$ 21,281.20 ($ 76.00 per participant)

Basic/Foundational Skills Instruction, Including High School Equivalency Programs (EPB) Component

Description of the component	
Target population	All SNAP E&T participants in need of a high school diploma or HSE, who have a TABE test score of 8.5-grade level or less, or possess a high school diploma or HSE and desire CTE but have a deficiency of basic skills as determined by standardized testing are eligible for EPB.
Criteria for participation	Participants must lack a high school diploma or HSE, have a deficiency of basic skills as determined by standardized testing, and/or express individual interest. Information about each participant's abilities, knowledge, skills, and/or needs is gathered during the participant's initial assessment. This information is used to determine appropriateness of participation in this component.
Geographic area	Statewide
E&T providers	TN Adult Education Division (WIOA Title II) and contract staff selected to provide AE services
Projected annual participation	90
Estimated annual component costs	$ 211.65 ($ 2.35 per participant)

Description of the component	
Not supplanting	TDLWD Case Managers determine during each participant's assessment if other funding options can be leveraged in support of educational costs before SNAP E&T funds are used. Staff are required to provide appropriate documentation demonstrating that E&T funds do not supplant non-federal funds (such as an invoice or other document showing education costs paid by another funding source). TDLWD Central Office staff monitor and review these records periodically.
Cost parity	TDLWD Case Managers ensure that SNAP E&T participants are charged the same costs for educational services and/or activities as nonparticipants. Staff are required to search for competitive pricing and/or alternative programming in local areas that aligns with participants' wants or needs, local employment markets, and/or high-demand occupations. Cost parity is verified during vendor evaluation and during the management oversight process. All expenses are reviewed and vetted to confirm they are reasonable and necessary for participation in the component.

Career/Technical Education Programs or other Vocational Training (EPC) Component

Description of the component	
Target population	All SNAP E&T participants with a high school diploma or HSE who want to gain knowledge and skills necessary for employment through an approved CTE program.
Criteria for participation	Participants must lack marketable skills or demonstrate the need to upskill to move towards self-sufficiency, have a high school diploma/HSE, or otherwise meet the minimum criteria established by providers to demonstrate basic knowledge, skills, experience, and/or interest, as required. Information about each participant's abilities, knowledge, skills, and/or needs is gathered during the participant's initial assessment and through ongoing case management. This information is used to determine appropriateness of participation in this component.

Description of the component	
	Costs are approved on a term-by-term basis. Ongoing assistance is dependent on continued eligibility for SNAP E&T, available funding, and participant progress and cooperation as outlined in the Voluntary Agreement.
Geographic area	Statewide
E&T providers	WIOA partners, TPP, ETPL training providers, and/or State-approved vendors or providers
Projected annual participation	1,826
Estimated annual component costs	$ 89,921.96 ($ 49.24 per participant)
Not supplanting	Participants may receive E&T-funded assistance with transportation, textbook purchases, and other supportive services based upon assessed needs while enrolled in EPC. Staff determine during each participant's assessment if other funding options can be leveraged in support of educational costs before SNAP E&T funds are used. Staff are required to provide appropriate documentation demonstrating that E&T funds do not supplant non-federal funds (such as an invoice or other document showing education costs paid by another funding source). TDLWD Central Office staff monitor and review these records periodically. Participants receiving Federal student aid via the FAFSA are not eligible for tuition assistance via SNAP E&T unless the awarded amount does not fully pay for selected training program costs. SNAP E&T will support participants with gap funding if the award is not issued in time to support required costs.
Cost parity	TDLWD Case Managers ensure that SNAP E&T participants are charged the same costs for educational services and/or activities as nonparticipants. Staff are required to search for competitive pricing and/or alternative programming in local areas that aligns with participants' wants or needs, local employment markets, and/or high-demand occupations. Cost parity is verified during vendor evaluation and during the management oversight process. All expenses are reviewed and vetted to

Description of the component	
	confirm they are reasonable and necessary for participation in the component.

English Language Acquisition (EPEL) Component

Description of the component	
Target population	All SNAP E&T participants who request language assistance, who do not speak English as their primary language, and/or for whom lack of English language skills is a barrier to employment.
Criteria for participation	Participants must have a primary language other than English and/or express a desire to learn English to assist with training and obtaining employment. Information about each participant's abilities, knowledge, skills, and/or needs is gathered during the participant's initial assessment and through ongoing case management. This information is used to determine appropriateness of participation in this component.
Geographic area	Statewide
E&T providers	WIOA partners, TPP, and/or State-approved vendors or providers
Projected annual participation	25
Estimated annual component costs	$ 211.65 ($ 8.47 per participant)
Not supplanting	Participants may receive E&T-funded assistance with transportation, textbook purchases, and other supportive services based upon assessed needs while enrolled in EPEL. Staff determine during each participant's assessment if other funding options can be leveraged in support of educational costs before SNAP E&T funds are used. Staff are required to provide appropriate documentation demonstrating that E&T funds do not supplant non-federal funds (such as an invoice or other document showing education costs paid by another funding source). TDLWD Central Office staff monitor and review these records periodically.
Cost parity	TDLWD Case Managers ensure that SNAP E&T participants are charged the same costs for educational services and/or activities as nonparticipants. Staff are required to search for

Description of the component	
	competitive pricing and/or alternative programming in local areas that aligns with participants' wants or needs, local employment markets, and/or high-demand occupations. Cost parity is verified during vendor evaluation and during the management oversight process. All expenses are reviewed and vetted to confirm they are reasonable and necessary for participation in the component.

Work Readiness Training (EPWRT) Component

Description of the component	This component helps participants develop Personal Effectiveness Competencies (i.e. soft skills), including foundational cognitive skills such as reading for information, applied mathematics, locating information, problem-solving, and critical thinking. EPWRT activities also help participants develop personal characteristics and behavioral skills such as adaptability, integrity, cooperation, and workplace discipline which enhance participants' interpersonal interactions, job performance, and career prospects. EPWRT participants may be referred and/or co-enrolled in JST for resources and activities that strengthen participants' employment efforts. EPWRT is not intended to be a long-term activity. This component must be completed within 3 months but can be extended on a case-to-case basis in special circumstances as approved by TDLWD.
Target population	All SNAP E&T participants for whom lack of foundational skills is a barrier to gaining employment or being successful in maintaining long-term employment. TN SNAP E&T further identifies justice-involved participants as a priority population.
Criteria for participation	Participants must demonstrate lack of foundational skills needed to enter employment, lack of foundational skills needed to maintain past employment, and/or express individual interest. Information about each participant's abilities, knowledge, skills, and/or needs is gathered during the participant's initial assessment and through ongoing case

Description of the component	This component helps participants develop Personal Effectiveness Competencies (i.e. soft skills), including foundational cognitive skills such as reading for information, applied mathematics, locating information, problem-solving, and critical thinking. EPWRT activities also help participants develop personal characteristics and behavioral skills such as adaptability, integrity, cooperation, and workplace discipline which enhance participants' interpersonal interactions, job performance, and career prospects. EPWRT participants may be referred and/or co-enrolled in JST for resources and activities that strengthen participants' employment efforts. EPWRT is not intended to be a long-term activity. This component must be completed within 3 months but can be extended on a case-to-case basis in special circumstances as approved by TDLWD.
	management. This information is used to determine appropriateness of participation in this component.
Geographic area	Statewide
E&T providers	TPP and/or State-approved vendors or providers
Projected annual participation	1,250
Estimated annual component costs	$ 36,297.62 ($29.04 per participant)
Not supplanting	Participants may receive E&T-funded assistance with transportation, textbook purchases, and other supportive services based upon assessed needs while enrolled in EPWRT. Staff determine during each participant's assessment if other funding options can be leveraged in support of educational costs before SNAP E&T funds are used. Staff are required to provide appropriate documentation demonstrating that E&T funds do not supplant non-federal funds (such as an invoice or other document showing education costs paid by another funding source). TDLWD Central Office staff monitor and review these records periodically.
Cost parity	TDLWD Case Managers ensure that SNAP E&T participants are charged the same costs for educational services and/or activities as

Description of the component	This component helps participants develop Personal Effectiveness Competencies (i.e. soft skills), including foundational cognitive skills such as reading for information, applied mathematics, locating information, problem-solving, and critical thinking. EPWRT activities also help participants develop personal characteristics and behavioral skills such as adaptability, integrity, cooperation, and workplace discipline which enhance participants' interpersonal interactions, job performance, and career prospects. EPWRT participants may be referred and/or co-enrolled in JST for resources and activities that strengthen participants' employment efforts. EPWRT is not intended to be a long-term activity. This component must be completed within 3 months but can be extended on a case-to-case basis in special circumstances as approved by TDLWD.
	nonparticipants. Staff are required to search for competitive pricing and/or alternative programming in local areas that aligns with participants' wants or needs, local employment markets, and/or high-demand occupations. Cost parity is verified during vendor evaluation and during the management oversight process. All expenses are reviewed and vetted to confirm they are reasonable and necessary for participation in the component.

On-the-Job Training (WBLOJT) Component

Description of the component	This component helps participants (herein referred to as conditional employees or trainees) acquire training for occupations that have limited or no formal classroom training requirements or in which "hands-on" training is necessary to learn the job. WBLOJT is used to encourage employers to hire individuals who may not otherwise qualify for a particular position and train them in the specific skills needed for that job, with the expectation that the employer will retain the individual after the training is successfully completed. WBLOJT is a training activity in the public or private sector that is given to a paid conditional employee engaged in a productive training activity that provides knowledge and skills essential to the performance of the job.

	The component will be structured as follows: • The State agency will act as the provider for this activity and conduct additional screening of participants to ensure appropriateness for training participation prior to placement as well as provide case management and necessary participant supports to achieve successful outcomes for participants. • Potential training placement opportunities will be identified throughout the state-by-State E&T staff based on specific criteria including the capacity of prospective employers to offer a structured, objective-driven training curriculum that is commensurate with the occupation being pursued by the participant. • The State agency will refer participants to training placement opportunities only if they meet the employer's established qualifications/criteria. As part of the screening process, employers will be allowed to interview potential trainees to ensure participants are appropriate for the training placement. • Potential employers will be required to submit training plans to the State agency for approval. All training plans must clearly demonstrate the trainee will acquire the specific knowledge and competencies needed for a specific position. • As a part of the training agreement, employers will agree that individuals who successfully complete a training assignment will be retained as a regular, full-time

	employee under the same rules as similarly situated employees. • Payments provided to employers will pay for the cost of providing the training. The employer will agree to provide instruction, equipment, and materials. Employers will also be responsible for documenting training attendance and progress towards meeting the training objectives. Employers are required to provide specific training to address the needs of the participant to perform the job they were conditionally hired to do. As part of the OJT program, the employer agrees to provide job-specific training that goes beyond any basic or regular training already provided to all other employees. This additional training could include soft skills training, work readiness training, or other skills training that will assist the participant in successfully maintaining the position. Upon successful training completion, retains the OJT participant as an employee. • If further training is required beyond the agreed upon training period, the employer must request approval from the state agency and provide a justification for extending the training period. • Trainee work time for which the trainee will be paid includes time spent engaged in work-related training (e.g., studying training manuals, attending job-related seminars, workshops or one-on-one training). • Participants who successfully complete the training program will be provided job retention services in accordance with the E&T Program rules. • Training placements will be time-limited with the length of the training period being appropriate to the occupation for which the participant is being trained. The duration will be determined by labor market information and will consider the content of the training as well as the prior work experience of the participant. • The specific length of the training period will be identified in the agreement executed for

	the placement as agreed upon by the employer and state agency prior to the beginning of participation. Below are two examples of training curriculums: Job Title: Administrative Assistant OJT Agreement Period: Four weeks • Company policies and position responsibilities • Basic computer application training (company database/systems) • Organizational processes: maintaining files, record keeping, inventory, organizing schedules, coordinating meetings, telephone etiquette, greeting guests and taking notes/memos. Job Title: Floor Tech/Custodial

	OJT Agreement Period: Six weeks • Company policies and position responsibilities • Custodial tools & equipment, custodial safety & chemical handling • Stairway & elevator cleaning • Cleaning carpet, hardwood and other types of floors • Carpet stain removal • High & low speed buffing
Target population	All SNAP E&T participants for whom lack of workplace skills and/or poor work history are barriers to gaining employment or being successful in maintaining long-term employment (as determined by WIOA Title I Career Services providers).
Criteria for participation	Participants must be co-enrolled in WIOA Title I programs and demonstrate significant barriers to employment, lack of basic foundational knowledge, low level of workplace experience, and/or very poor work history but high degree of motivation to work. WBLOJT participants must be actively enrolled and complete all program activities as established by TPPs. Information about each participant's abilities, knowledge, skills, and/or needs is gathered during the participant's initial assessment and through ongoing case management. This information is used to determine appropriateness of participation in this component.
Geographic area	Statewide
E&T providers	TPP
Projected annual participation	30
Estimated annual component costs	$ 4,803.83 ($ 160.13 per participant) Note: TN operates the WBLOJT component in alignment with the WIOA Combined Plan; the $160.13 cost per participant is for project-specific administrative expenses, including personnel costs, IT infrastructure, etc. The cost per participant does not include any costs related to participants' tuition,

	training, etc. as these costs are covered via other funding streams as a result of co-enrollment in WIOA and other programs.

Work-Based Learning (WBLO) Component

Description of the component	
Target population	All SNAP E&T participants for whom lack of workplace skills and/or poor work history are barriers to gaining employment or being successful in maintaining long-term employment.
Criteria for participation	Participants must demonstrate significant barriers to employment, lack of basic foundational knowledge, low level of workplace experience, and/or very poor work history but high degree of motivation to work. WBLO participants must be actively enrolled and complete all program activities as established by TPPs. Information about each participant's abilities, knowledge, skills, and/or needs is gathered during the participant's initial assessment and through ongoing case management. This information is used to determine appropriateness of participation in this component.
Geographic area	Statewide
E&T providers	TPP
Projected annual participation	250
Estimated annual component costs	$ 15,143.87 ($60.58 per participant) Note: TN operates the WBLO component in alignment with the WIOA Combined Plan; the $60.58 cost per participant is for project-specific administrative expenses, including personnel costs, IT infrastructure, etc. The cost per participant does not include any costs related to participants' tuition, training, etc. as these costs are covered via other funding streams as a result of co-enrollment in WIOA and other programs.

2. A DESCRIPTION OF THE CASE MANAGEMENT SERVICES AND MODELS, HOW PARTICIPANTS WILL BE REFERRED TO CASE MANAGEMENT, HOW THE PARTICIPANT'S CASE WILL BE MANAGED, WHO WILL PROVIDE CASE MANAGEMENT SERVICES, AND HOW THE SERVICE PROVIDERS WILL COORDINATE WITH E&T PROVIDERS, THE STATE AGENCY, AND OTHER

COMMUNITY RESOURCES, AS APPROPRIATE. THE STATE PLAN SHOULD ALSO DISCUSS HOW THE STATE AGENCY WILL ENSURE E&T PARTICIPANTS ARE PROVIDED WITH TARGETED CASE MANAGEMENT SERVICES THROUGH AN EFFICIENT ADMINISTRATIVE PROCESS;

Table 30: TN SNAP E&T - Estimated Costs of Operation

Cost Types	State Cost	Federal Cost	Total
I. Direct Costs:			
a) Salary/Wages	$0	$0	$0
b) Fringe Benefits* Approved (Fringe Benefit Rate Used 32%)			
c) Contractual Costs (Admin Only)	$6,354,951	$8,624,737	$14,979,688
d) Non-capital Equipment and Supplies	$0	$0	$0
e) Materials	$0	$0	$0
f) Travel	$0	$0	$0
g) Building/Space	$0	$0	$0
h) Equipment & Other Capital Expenditures	$0	$0	$0
Total Direct Costs	$6,354,951	$8,624,737	$14,979,688
II. Indirect Costs:			
Indirect Costs* Approved Indirect (Cost Rate Used: 14.59%)			
III. In-kind Contribution			
State In-Kind Contribution	$0	$0	$0
Total Administrative Cost (Total of items I, II, III)	$6,354,951	$8,624,737	$14,979,688
100 Percent Federal E&T Grant		$2,269,786	$2,269,786

Cost Types	State Cost	Federal Cost	Total
50 Percent Additional Administrative Expenditure	$6,354,951	$6,354,951	$$12,709,902
IV. Participant Reimbursement (State plus Federal)			
a) Dependent Care (including contractual costs)	$0	$0	$0
b) Transportation & Other Costs (including contractual costs)	$135,000	$135,000	$270,000

3. 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;

Table 30: TN SNAP E&T - Estimated Costs of Operation

Cost Types	State Cost	Federal Cost	Total
I. Direct Costs:			
a) Salary/Wages	$0	$0	$0
b) Fringe Benefits* Approved (Fringe Benefit Rate Used 32%)			
c) Contractual Costs (Admin Only)	$6,354,951	$8,624,737	$14,979,688
d) Non-capital Equipment and Supplies	$0	$0	$0

Cost Types	State Cost	Federal Cost	Total
e) Materials	$0	$0	$0
f) Travel	$0	$0	$0
g) Building/Space	$0	$0	$0
h) Equipment & Other Capital Expenditures	$0	$0	$0
Total Direct Costs	$6,354,951	$8,624,737	$14,979,688
II. Indirect Costs:			
Indirect Costs* Approved Indirect (Cost Rate Used: 14.59%)			
III. In-kind Contribution			
State In-Kind Contribution	$0	$0	$0
Total Administrative Cost (Total of items I, II, III)	$6,354,951	$8,624,737	$14,979,688
100 Percent Federal E&T Grant		$2,269,786	$2,269,786
50 Percent Additional Administrative Expenditure	$6,354,951	$6,354,951	$$12,709,902
IV. Participant Reimbursement (State plus Federal)			
a) Dependent Care (including contractual costs)	$0	$0	$0
b) Transportation & Other Costs (including contractual costs)	$135,000	$135,000	$270,000

4. 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;

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. 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. TDLWD is 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.

5. 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.

6. THE ESTIMATED NUMBER OF VOLUNTEERS THE STATE AGENCY EXPECTS TO PLACE IN E&T;

The estimated number of volunteers Tennessee plans to serve for FY2024 is 3,977.

7. 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.

8. 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.

9. 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.

10. 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.

11. 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 Subprograms staff throughout the year to strategize ways to identify and serve more SNAP participants. 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.

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 or contact the participant virtually within 10 business 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 TDHS.SNAP-ET@tn.gov mailbox at a minimum of every 30 days through VOS.

12. 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; THE STATE AGENCY MUST DOCUMENT HOW IT CONSULTED WITH THE STATE WORKFORCE DEVELOPMENT BOARD. IF THE STATE AGENCY CONSULTED WITH PRIVATE EMPLOYERS OR EMPLOYER ORGANIZATIONS IN LIEU OF THE STATE WORKFORCE DEVELOPMENT BOARD, IT MUST DOCUMENT THIS CONSULTATION AND EXPLAIN THE DETERMINATION THAT DOING SO WAS MORE EFFECTIVE OR EFFICIENT. THE STATE AGENCY MUST INCLUDE IN ITS E&T STATE PLAN A DESCRIPTION OF ANY OUTCOMES FROM THE CONSULTATION WITH THE STATE

WORKFORCE DEVELOPMENT BOARD OR PRIVATE EMPLOYERS OR EMPLOYER ORGANIZATIONS. THE STATE AGENCY MUST ALSO ADDRESS IN THE E&T STATE PLAN THE EXTENT TO WHICH E&T ACTIVITIES WILL BE CARRIED OUT IN COORDINATION WITH THE ACTIVITIES UNDER TITLE I OF WIOA;

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.

13. 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;

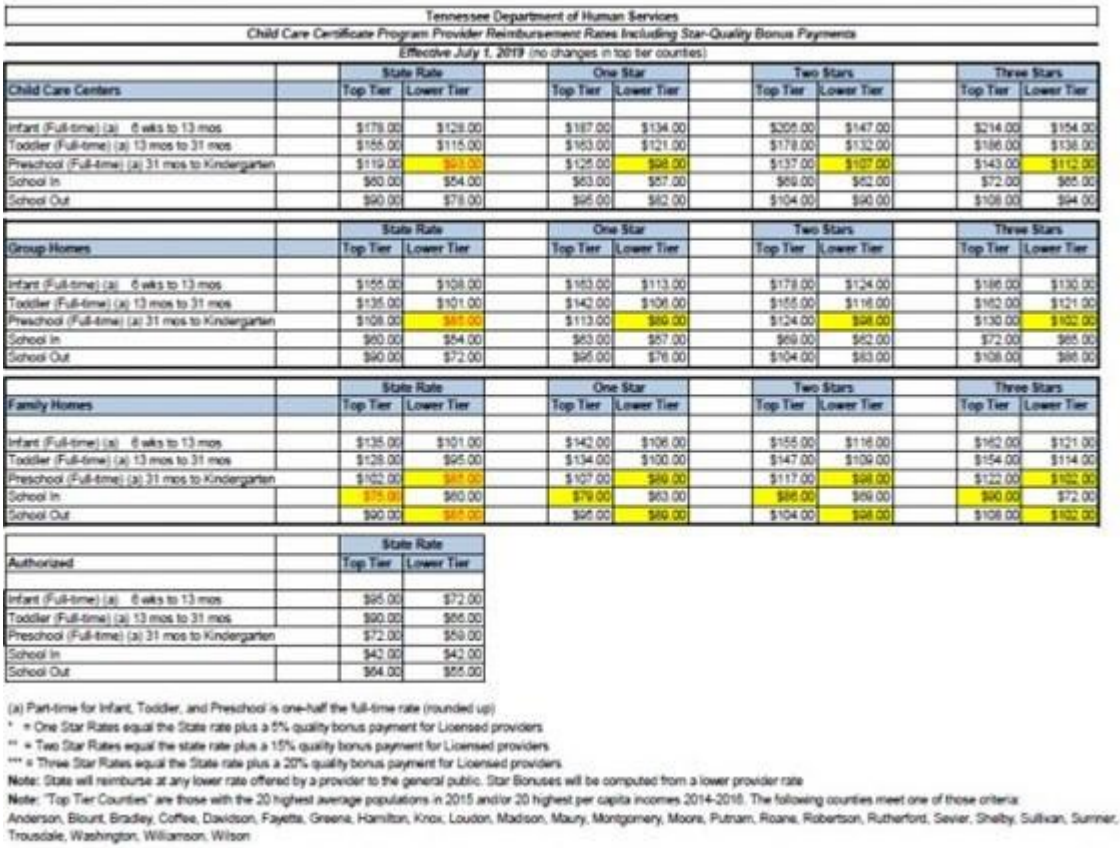
There are currently no Tribal Organizations in the state of Tennessee.

14. 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 2024; therefore, the conciliation policy is not applicable at this time.

15. 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.

Figure 25 - TN SNAP E&T -



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
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	$186.00	$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	$60.00	$54.00	$63.00	$57.00	$69.00	$62.00	$72.00	$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
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	$106.00	$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	$60.00	$54.00	$63.00	$57.00	$69.00	$62.00	$72.00	$65.00
School Out	$90.00	$72.00	$95.00	$76.00	$104.00	$83.00	$108.00	$86.00

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
Infant (Full-time) (a) 6 wks to 13 mos	$135.00	$101.00	$142.00	$106.00	$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	$85.00	$107.00	$89.00	$117.00	$98.00	$122.00	$102.00
School In	$75.00	$60.00	$79.00	$63.00	$86.00	$69.00	$90.00	$72.00
School Out	$90.00	$85.00	$95.00	$89.00	$104.00	$98.00	$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	$66.00
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 2014-2018. 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

16. 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.

17. 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.

18. FOR EACH COMPONENT THAT IS EXPECTED TO INCLUDE 100 OR MORE PARTICIPANTS, REPORTING MEASURES THAT THE STATE WILL COLLECT AND INCLUDE IN THE ANNUAL REPORT IN PARAGRAPH (C)(17) OF THIS SECTION. SUCH MEASURES MAY INCLUDE:

A. THE PERCENTAGE AND NUMBER OF PROGRAM PARTICIPANTS WHO RECEIVED E&T SERVICES AND ARE IN UNSUBSIDIZED EMPLOYMENT SUBSEQUENT TO THE RECEIPT OF THOSE SERVICES;

Not applicable.

B. THE PERCENTAGE AND NUMBER OF PARTICIPANTS WHO OBTAIN A RECOGNIZED CREDENTIAL, A REGISTERED APPRENTICESHIP, OR A REGULAR SECONDARY SCHOOL DIPLOMA (OR ITS RECOGNIZED EQUIVALENT), WHILE PARTICIPATING IN, OR WITHIN 1 YEAR AFTER RECEIVING E&T SERVICES;

Not applicable.

C. THE PERCENTAGE AND NUMBER OF PARTICIPANTS WHO ARE IN AN EDUCATION OR TRAINING PROGRAM THAT IS INTENDED TO LEAD TO A RECOGNIZED CREDENTIAL, A REGISTERED APPRENTICESHIP AN ON-THE-JOB TRAINING PROGRAM, A REGULAR SECONDARY SCHOOL DIPLOMA (OR ITS RECOGNIZED EQUIVALENT), OR UNSUBSIDIZED EMPLOYMENT;

Not applicable.

D. MEASURES DEVELOPED TO ASSESS THE SKILLS ACQUISITION OF E&T PROGRAM PARTICIPANTS THAT REFLECT THE GOALS OF THE SPECIFIC COMPONENTS INCLUDING THE PERCENTAGE AND NUMBER OF PARTICIPANTS WHO ARE MEETING PROGRAM REQUIREMENTS OR ARE GAINING SKILLS LIKELY TO LEAD TO EMPLOYMENT; AND

Not applicable.

E. OTHER INDICATORS APPROVED BY FNS IN THE E&T STATE PLAN.

Not applicable.

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 2024.

2. ESTIMATED COSTS OF FULFILLING ITS PLEDGE;

Tennessee will not operate under a “pledge state” status for FFY 2024.

3. A DESCRIPTION OF MANAGEMENT CONTROLS IN PLACE TO MEET PLEDGE REQUIREMENTS;

Tennessee will not operate under a “pledge state” status for FFY 2024.

4. A DISCUSSION OF ITS CAPACITY AND ABILITY TO SERVE AT-RISK ABAWDS;

Tennessee will not operate under a "pledge state" status for FFY 2024.

5. INFORMATION ABOUT THE SIZE AND SPECIAL NEEDS OF ITS ABAWD POPULATION; AND

Tennessee will not operate under a "pledge state" status for FFY 2024.

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 2024.

JOBS FOR VETERANS' STATE GRANTS

(OMB Control Number: 1293-0017)

Components of the Jobs for Veterans State Grants State Plan

Jobs for Veterans State Grants (JVSG) recipients must provide a four-year state plan as a condition for the receipt of annual funding in accordance with 38 U.S.C. § 4102A(c). This plan must include responses to each of the components below.

A. DESCRIBE HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING, AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG PROGRAM (I.E., VIRTUALLY AND IN-PERSON).

- A walkthrough of how eligible participants access American Job Center (AJC) services, are triaged and referred for Disabled Veterans' Outreach Program (DVOP) services and receive individualized career services through a case management framework.
- How the DVOP works with AJC staff and partners to connect veterans and other eligible participants to training and employment opportunities.
- How the Local Veterans' Employment Representatives (LVER) connect in the local employer community to promote job opportunities for veterans.

The goal is to help the Veteran become job-ready and gain employment in a field of their interest and/or ability. Tennessee has developed a standardized process for referring veterans and other eligible persons with significant barriers to employment (SBE) to a DVOP (see attached flowchart). This triage approach begins at the point of entry into the American Job Center (AJC). Triage can be conducted either in-person or telephonically by front desk staff asking a series of questions to determine eligibility for the various AJC programs, SBEs, and services desired. Tennessee also offers assistance through a virtual AJC where veterans and eligible persons can identify what services they are seeking, and the system will match them with the appropriate AJC partner.

As part of the triage process, all customers are asked if they have served in the military or are the spouse of a veteran. If they answer "YES" to the question, the Veteran/eligible person is given a copy of the most current approved "Eligibility Triage Form" (ETF), with instructions on how to complete the form and then return it to the intake person. The intake person will review the form and assess the questionnaire responses. Based on their self-attested reason for visit, they will be referred to the appropriate AJC staff for services.

Veterans and eligible persons who are identified as having a SBE through the initial intake process and need individualized career services (ICS), may be referred to a DVOP/ Consolidated Position (CP) staff for assistance and placed into case management. If referred to the DVOP/CP for case management services, the DVOP/CP and the Veteran/eligible person will work together to complete a comprehensive assessment to document any current or potential SBEs and services needed to help overcome those SBEs. Following completion of the objective assessment, the DVOP/CP will work with the Veteran/eligible person to develop an individual employment plan (IEP) to assist them in overcoming those barriers to employment and become job ready through agreed-upon goals and objectives. The Veteran/eligible person would then, if required, be referred to an appropriate partner for additional services as needed based on the IEP. Consistent contact with the Veteran/eligible person will be conducted through in-person, virtual, or telephonic means. Consistent contact will occur no less than every 14 days, and more often as needed depending on the Veteran/eligible person's barriers. DVOPs will continue to follow-up with the Veteran/eligible person once they obtain employment at 30/60/90-day intervals.

After the comprehensive assessment is conducted to identify barriers and services needed, a DVOP will refer the Veteran/eligible person to partner AJC staff such as Title I (Adult) for training and other support services, Adult Education (AE), the Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T), Re-employment Services Eligibility Assessment (RESEA), and the Temporary Assistance for Needy Families (TANF) program. The use of this multi-agency strategy, combined with a value for streamlined program integration will ensure the Veteran/eligible person is provided maximum employment and training assistance that will aid in addressing the basic skills needed to promote more qualified, effective, and efficient opportunities for veterans. DVOPs will coordinate case management with the partners to ensure there is not a duplication in services, the IEP is being followed/updated as appropriate, and case notes are properly maintained.

In the absence of DVOP staff, or if the Veteran/eligible person does not meet the criteria for DVOP services, the Team Lead, or other Wagner-Peyser staff assumes responsibility for the assessment of the individual and ensures that appropriate referrals and services are provided.

LVER staff are assigned to each of the nine local workforce boards and responsible for employer outreach, promoting the benefits of hiring Veterans/eligible persons and developing employment opportunities for Veterans/eligible persons in their respective areas. One way this promotion process can be accomplished is by introducing employers to the immediate tangible incentives such as the Work Opportunity Tax Credit (WOTC, when funded), Incumbent Worker Training, On the job training (OJT), apprenticeships, GI Bill benefits, and state and federal dislocated worker programs that are available to them when they hire Veterans.

Intangible incentives to hiring Veterans include the "soft skills" Veterans bring to the hiring table such as teamwork, trainability, leadership, diversity in the workplace, and a host of others that are inherent to the military experience. The LVER staff increases exposure for employers by organizing and/or promoting public events like career fairs, Society for Human Resource Management (SHRM) events, Chamber of Commerce events, and the Hire Vets Medallion Program, which in turn increases the visibility of employment opportunities for Veterans.

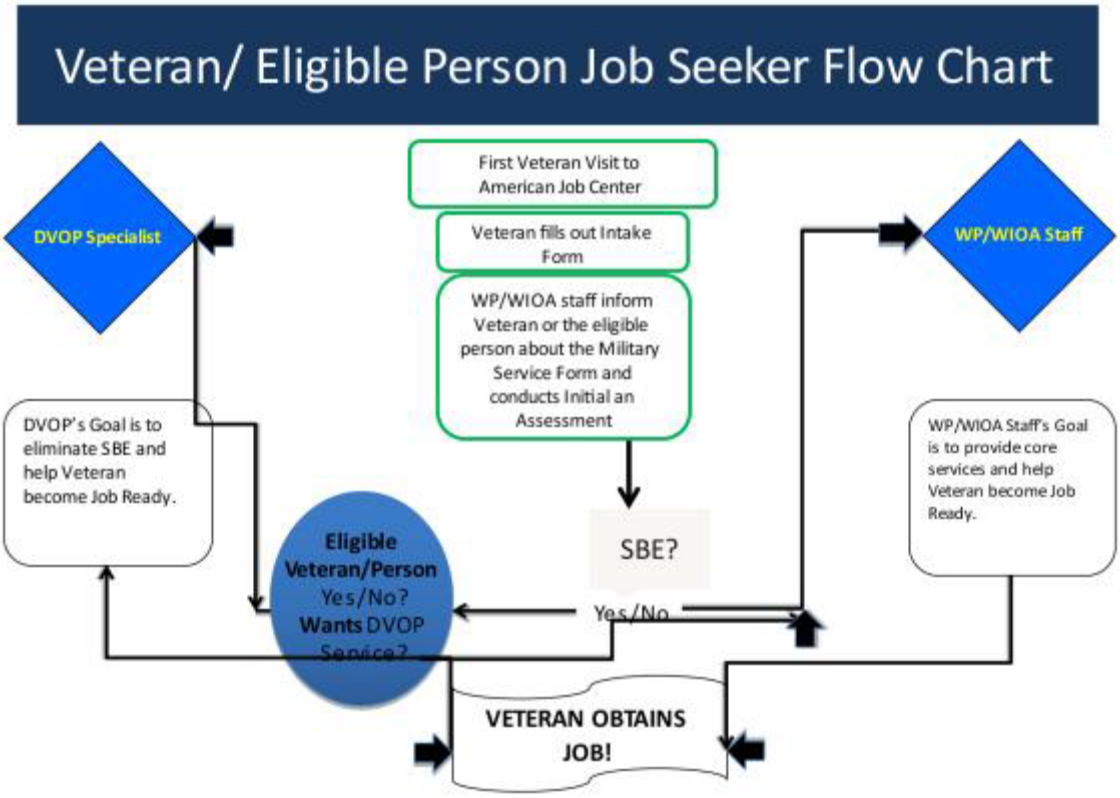
LVERs serve as a valuable source within the business engagement plan which includes a focus on identifying business needs through numerous and innovative channels, depending on the lifecycle of the business, and ensure a full range of possible resources and benefits are delivered in a timely manner. To succeed in these areas, LVERs serve employers by focusing on the TDLWD Seven Key Pillars which are (1) Sector-Based Service Delivery, (2) Business Cycle

Framework, (3) LWDB as Asset Mappers, (4) Employer Case Management, (5) Enterprise Alignment, (6) AJC Network, and (7) Training and Development. These key pillars support reaching the goals of improving communications, alignment, implementation, measurement, accountability, and agility of the agency and the workforce system statewide.

LVERs are an integral part of our Business Service Team (BST). The BST provides valuable information about promoting Veterans within a variety of venues including job fair participation, Chamber of Commerce meetings, Society for Human Resource Managers (SHRM) meetings, employer visits, public radio and television service spots, and departmental brochures. The advantage of hiring Veterans/eligible persons is a topic that needs to be presented to an employer consistently. Tennessee's American Job Centers (AJCs), through the Business Services Team (BST), provides an effective conduit to promote Veterans/eligible persons to businesses as a sound and wise investment. Federal contractors and subcontractors are also targeted as they not only benefit from the hiring of Veterans but are reminded about their responsibilities under the Office of Federal Contract and Compliance Programs (OFCCP) and Vietnam Era Veterans Readjustment Assistance Act (VEVRAA) guidelines as well.

LVERs also work closely with Chambers of Commerce and local governments across the state with the development of a military recruitment strategy to encourage transitioning service members and their families to relocate to those areas.

Consolidated Position (CP) Staff serve a dual role as DVOP specialist and LVER. They provide services to both employers and SBE Veterans/eligible persons. After they have assisted their Veteran/eligible person in addressing the identified SBEs through individualized career services and determined to be job ready, they move into their LVER role and conduct job searches, employer outreach, coordinate apprenticeship/OJT opportunities, schedule job clubs, and other employment opportunities for those in their caseload. Consolidated staff also provide training to other AJC staff to ensure programmatic compliance in serving the needs of Veterans/eligible persons seeking our assistance.



B. LIST THE POPULATIONS TO BE SERVED BY DISABLED VETERANS' OUTREACH PROGRAM (DVOP) AND CONSOLIDATED POSITION STAFF, INCLUDING THE ELIGIBILITY CRITERIA FOR REFERRAL FOR DVOP SERVICES.

All populations served by DVOPs must meet eligibility requirements in accordance with current Veterans' Employment and Training Service guidance. Please refer to the following Veterans' Program Letters (VPL), or most current guidance, to identify the eligible populations to be served by this grant:

DVOPs will specifically serve Veterans/eligible persons as defined by VPL's 03-14, Ch. 1&2, 07-14, 03-19, or current guidance.

These include:

- A special disabled or disabled veteran, as those terms are defined in 38 USC §4211(1)(3); special disabled and disabled veterans are those:
    - who are entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or,
    - were discharged or released from active duty because of a service-connected disability;
- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 USC 11302(a) and (b)), as amended, to include domestic violence and other dangerous or life-threatening conditions affecting permanent residence;

- A recently-separated service member, as defined in 38 USC §4211(1)(6), who has been unemployed for 27 or more weeks in the previous 12 months;
- An offender, as defined by the Workforce Innovation and Opportunity Act Section 3(38), who is currently incarcerated or who has been released from incarceration;
- A veteran lacking a high school diploma or equivalent certificate;
- A low-income individual (as defined by WIOA Section 3(36));
- Veterans aged 18-24;
- Vietnam-era Veterans; and
- Eligible Transitioning Service Members, Spouses, and Caregivers.
    - Transitioning members of the Armed Forces who have been identified as in need of intensive services (now referred to as Individualized Career Services);
    - Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities (MTF) or warrior transition units (WTU); and
    - The spouses or other family caregivers of such wounded, ill, or injured members.

As part of the triage process, all customers are asked if they have served in the military or are the spouse of a Veteran. If they answer "YES" to the question, the Veteran/eligible person is given a copy of the most current approved "Eligibility Triage Form" (ETF), with instructions on how to complete the form and then return it to the intake person. The intake person will review the form and assess the questionnaire responses. If determined to meet the criteria for a population that can be served by a DVOP, further assessment by a non-JVSG staff person will be conducted to determine if they meet the definition of an eligible Veteran based on 38 USC 4211(4) or an eligible person based on 38 USC 4101(5).

An eligible Veteran is a person who:

1. Served on active duty for a period of more than 180 days and was discharged or released therefrom with other than a dishonorable discharge;
2. Was discharged or released from active duty because of a service-connected disability; or
3. As a member of a reserve component under an order to active duty pursuant to section 12301 (a), (d), or (g) 12302, or 12304 of title 10, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge.

An eligible person is:

1. The spouse of any person who died of a service-connected disability;
2. The spouse of any member of the Armed Forces serving on active duty who, at the time of application for assistance under this chapter [38 U.S.C 4101] et seq.]' 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: (i) missing in action, (ii) captured in line of duty by a hostile force, or (iii) forcibly detained or interned in line of duty by a foreign government or power; or

3. The spouse of any person who has a total disability permanent in nature resulting from a service-connected disability or the spouse of a Veteran who died while a disability so evaluated was in existence.

Per VPL 03-19, transitioning service members; wounded, ill, or injured servicemembers residing in military treatment facilities; and spouses/family caregivers of those wounded, ill, or injured servicemembers can be served by DVOPs.

C. DESCRIBE THE ROLES AND RESPONSIBILITIES ASSIGNED TO DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALISTS, LOCAL VETERANS' EMPLOYMENT REPRESENTATIVE (LVER) STAFF, AND CONSOLIDATED DVOP/LVER POSITIONS BY THE STATE. THESE MUST BE CONSISTENT WITH 38 U.S.C. 4103A AND 4104.

DVOPs duties:

The primary duty of the DVOP is to provide individualized career services to Veterans/eligible persons with SBEs and additional eligible populations through a case management framework.

After the initial assessment of a Veteran in the AJC by non-JVSG staff, and determined that they are eligible for JVSG services, consistent with VPL 03-19, 03-14, Ch. 1 & 2, or current guidance, they will be referred to a DVOP/CP staff for assistance. To render effective case management services, the DVOP must, at a minimum:

- Conduct a comprehensive assessment of individual needs.
- Develop a documented IEP based on any employment barriers identified during the assessment process and regularly update the plan as needed.
- Consistent Contact – Regular, consistent contact between the DVOP/CP staff and the Veteran/eligible person will be conducted both pre- and post-employment through in-person and/or virtual meetings, telephone contact, and e-mail. Consistent contact is based on the participant's individual needs and situation per the written plan and case notes and will occur no less than once every 14 days during case management and during the 90-day follow-up period once employment is obtained. Any contact or attempt at contact must be documented in case notes. Appropriate activity codes should also be documented in the Veteran's/eligible person's case file.

These three elements form the core of an effective case management framework under which individual career services will be delivered.

Upon completion of the objective assessment, the DVOP can determine the need for additional individualized career services and document those services on the IEP and in case notes.

These services can take the form of:

- Providing vocational guidance and individual counseling as required, such as skills assessment, career planning, communications skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct.
- Refer Veterans/eligible persons to community–based organizations regarding employment and training services available to Veterans; develop relationships with Veteran Service Organizations and other federal, state, and local programs to provide maximum employment assistance.
- Job referrals for specific employment opportunities.

- Referrals to training programs with other agencies, such as VA Veteran Readiness and Employment, as well as partner programs within the AJC, such as SNAP E&T, Adult Education, State Vocational Rehabilitation, and Adult, Dislocated Worker, and Youth Activities.

DVOPs are required to take an active role in conducting outreach to find and assist SBE Veterans/eligible persons. Outreach may occur at other local, state, and federal government agencies, Veterans Service Organizations, community service organizations, LWDA partners, faith-based organizations, local community colleges/universities, Veterans Treatment Courts (VTC), and any other entities that are dedicated to locating and serving Veterans/eligible persons.

TDLWD acknowledges that homeless Veterans may not 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 that serve homeless Veterans, such as US DOL VETS Homeless Veterans Reintegration Program (HVRP) grantees, Supportive Services for Veterans and Families (SSVF), VA Medical Centers, Vet Centers, County Veteran Service Offices, civic and community service organizations, local homeless shelter organizations, and other sources as identified to provide services to homeless Veterans.

LVER Duties:

The LVER will actively advocate for employment and training opportunities with business, industry, and community-based organizations on behalf of Veterans/eligible persons consistent with VPL 03-14 Ch's 1 & 2, VPL 07-14, VPL 03-19 or current guidance. LVERs will be assigned duties that promote to employers, employer associations, and business groups the advantages of hiring Veterans/eligible persons and will be part of the "Business Services Team" within the AJC that conducts outreach activities to these entities.

The following activities will be part of this program:

- 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.
- Form effective relationships with the business community and trade unions to enhance the availability of employment and training opportunities for Veterans/eligible persons.

(a) Encourage businesses to hire Veterans/eligible persons 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.

(b) Maintain current labor market information on trends and adjust strategies accordingly.

- Work with training providers and credentialing bodies to promote opportunities for Veterans/eligible persons.

(a)Encourage employers in professions requiring licensure or certification to develop OJT and/or apprenticeship programs for Veterans/eligible person.

(b)Promote the participation of Veterans/eligible persons in programs leading to certification or licensure.

(c)Advocate with training providers and credentialing agencies for recognition of equivalent military training.

- Plan and participate in job fairs to provide employment opportunities for Veterans/eligible persons.

The LVER will facilitate this by:

(a) 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/eligible persons.

(b) maintaining current information regarding a full range of employment and training options available to Veterans/eligible persons.

- Work with federal contractors to inform them of the process they can use to recruit and hire Veterans/eligible persons 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/eligible persons.

CONSOLIDATED POSITION (CP) Duties:

CP staff serve in a dual role as a DVOP Specialist and LVER. They perform the services of LVER to employers and DVOP to the most in need Veterans/eligible persons. This allows one position to fill both roles to ensure Veteran/eligible persons are being provided individualized career services in strategically placed areas of the state. Once a Veteran's/eligible person's employment and training needs have been identified, AJC staff ensures that appropriate services are provided.

General Duties:

LVER/DVOPS/CP personnel all attend AJC staff meetings to provide updates on Veteran/eligible persons, answer questions from staff, and discuss needed services. CP staff are also available to provide training to other AJC staff. CP staff conduct employer outreach and plan job fairs and other activities to promote the employment of Veterans/eligible persons.

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 the achievement of positive employment outcomes. Tennessee has established and continues to adhere to a Priority of Service for Veterans.

D. DEMONSTRATE THE MANNER IN WHICH DVOP, LVER AND CONSOLIDATED DVOP/LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEMS OR AMERICAN JOB CENTER (AJC). THIS DEMONSTRATION SHOULD SHOW ACTIVE ENGAGEMENT BETWEEN JVSG AND OTHER AJC STAFF, SUCH AS THROUGH PARTICIPATION IN STAFF MEETINGS AND CROSS-TRAINING OPPORTUNITIES.

DVOP, LVER, and consolidated DVOP/LVER positions are integrated into the employment service delivery system and below include some activities each role might perform:

- LVERs are an integral part of the Business Service Teams, collaborating with team members to reach out to employers to present information on all programs, avoiding duplicative visits.
- LVERs work with Workforce Innovation and Opportunity Act (WIOA) case managers to create job opportunities for Veterans being case managed and trained through other WIOA one-stop partner programs.
- DVOPs share information with partner staff regarding available community resources they can access to better serve Veterans who may not be eligible for DVOP services.

The LVER in each AJC is part of the local workforce area's Business Services Team, helping to develop a plan for an effective employer relations program that emphasizes the hiring and retention of Veterans, especially with federal contractors. LVERs train AJC staff on Priority of Service, the roles and responsibilities of JVSG staff, and how to properly triage Veterans/eligible persons upon entry to the AJC. The LVER is also responsible for informing management, staff, and other AJC partners of current policies, laws, and programs as they relate to Veterans/eligible persons. Tennessee recognizes the importance of developing job driven employment and training opportunities for the Veterans/eligible persons residing in the state. Each LVER works with other business engagement staff to identify job-driven employment and training opportunities that can be filled by Veterans/eligible persons and provides that information to DVOP staff and other AJC staff. This occurs at weekly staff meetings, through email exchanges, and through one-on-one discussions with staff.

DISABLED VETERANS OUTREACH PROGRAM SPECIALISTS (DVOP)

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 the state's 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. 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.

DVOPs attend weekly Functional Team meetings directed by the Career Development Lead, monthly staff meetings with the Team Lead for state staff, and quarterly AJC cross-training meetings with local and regional partner staff hosted by the One Stop Operator to ensure that all partners are aligned with the same goals and standards across the local area and state to enhance services to Veterans. DVOPs have the opportunity to share ideas with the other partners on the delivery of services for Veterans/other eligibles and discuss how they can work together to enhance those services.

CONSOLIDATED POSITIONS (CP):

The CP staff in each AJC is part of the business services team. CP staff 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 CP staff are also responsible for informing management, staff, and other AJC partners of current Veteran policies, laws, and programs.

E. DESCRIBE THE STATE'S PERFORMANCE INCENTIVE AWARD PROGRAM TO ENCOURAGE INDIVIDUALS AND/OR EMPLOYMENT SERVICE OFFICES TO IMPROVE AND/OR ACHIEVE EXCELLENCE IN THE PROVISION OF SERVICES TO VETERANS, INCLUDING:

1. THE NOMINATION AND SELECTION PROCESS FOR ALL PERFORMANCE INCENTIVE AWARDS TO INDIVIDUALS AND/OR OFFICES;

Selection Committee

The selection committee for these awards will be comprised of the 3 Regional Directors, the TN Director of Veteran Services, U.S. Department of Labor, Veterans' Employment and Training Service State Director, and the Assistant State Veterans' Program Coordinator(s). The selection committee members will be responsible for: (a) recording the minutes of each committee meeting; (b) retaining documentation for one (1) year on all AJCs that have been nominated; (c) ensuring persons on the selection committee who have made nominations do not vote on those nominations; and, (d) pre-approving an additional person to act as a "tie-breaking" vote in the event one is needed.

Submissions

Submissions for an AJC may include documentation that displays outstanding service to a Veteran or Veterans, in turn producing positive outcomes. Awards to AJCs should be reserved for instances where most, if not all, office staff contribute to providing or improving employment and training services to Veterans. Each individual AJC may submit one (1) application. Activities must have taken place during the current program year, which runs July 1st to June 30th. Submissions must clearly indicate they are for Incentive Award consideration. For example, a VETS Success Story submission will not be assumed they are also Incentive Award submissions unless clearly marked as such.

Awards will occur annually on the following timeline:

- October 1st Presentation of Annual Incentive Award Program
- April 1st Submission deadline
- April 15th Committee meets to review submissions
- June 15th Announcement of Awards

Examples of outstanding service include, but are not limited to:

-
    - An exemplary success story showcasing substantial assistance with overcoming SBE(s) leading to successful job placement or development.
    - Developing and sharing a best practice that has greatly benefited veterans.
    - Creating and implementing a new program or initiative that promotes employment or training opportunities for Veterans.
    - Additional achievements that provide a positive impact that enables a veteran or veterans to achieve meaningful employment.

Incentive Award funds will be distributed via Tennessee Department of Labor Finance Administration. All funds must be obligated by September 30th and expended by December

31st. Any unspent incentive award funding will be de-obligated during the grant close out of the applicable fiscal year.

2. THE APPROXIMATE NUMBER AND VALUE OF CASH AWARDS USING THE ONE PERCENT INCENTIVE AWARD ALLOCATION;

The Tennessee DOL-VETS JVSG Program utilizes the monetary incentive awards program authorized under VPL 01-24, Attachment 5, or most current guidance, to recognize American Job Center (AJC) staff that provide exceptional service to Veterans and other eligible persons. Per guidance, 1% of the annual JVSG funding may be used for incentive awards.

The objective of the program is to encourage staff members to be more attuned to the needs of the Veterans and other eligible persons served in the AJCs, as well as continually ensure improvements are made to the overall delivery system of services provided to Veterans and other eligible persons. There will be a total of three (3) AJCs awarded each year. The annual incentive award amount will be evenly split between each AJC awarded. These incentive award funds can be used for any purpose within the guidelines of VPL 01-24, or most current guidance. We understand these amounts will vary based on our annual allocation, but average $12,000+ for each award given.

3. THE GENERAL NATURE AND APPROXIMATE VALUE OF NON-CASH PERFORMANCE INCENTIVE AWARDS TO BE CHARGED TO THE BASE ALLOCATION; AND

Tennessee will not provide non-cash incentive awards.

4. ANY CHALLENGES THE STATE MAY ANTICIPATE TO CARRYING OUT A PERFORMANCE INCENTIVE AWARD PROGRAM AS MANDATED BY 38 U.S.C. § 4102A(C). THIS SHOULD INCLUDE ANY STATE LAWS OR POLICIES THAT PROHIBIT SUCH AWARDS, IF APPLICABLE. DESCRIBE THE STATE'S EFFORTS IN OVERCOMING THOSE CHALLENGES.

Due to the Pay for Performance cash awards, state employees are not permitted to receive individual cash awards through the incentive award program. While there is no written policy, this is the practice of the State, TDLWD. We will continue talks with leadership to determine if individual cash awards can be given.

F. LIST THE PERFORMANCE TARGETS FOR DIRECT SERVICES TO VETERANS PROVIDED BY JVSG STAFF, AS MEASURED BY PARTICIPANTS':

- employment rate in the second quarter after exit from the program;
- employment rate in the fourth quarter after exit; and
- median earnings in the second quarter after exit.

• Employment Rate 2nd Quarter After Exit: **55%**

• Employment Rate 4th Quarter After Exit: **50%**

• Median Earnings 2nd Quarter After Exit: **$7,000.00**

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.

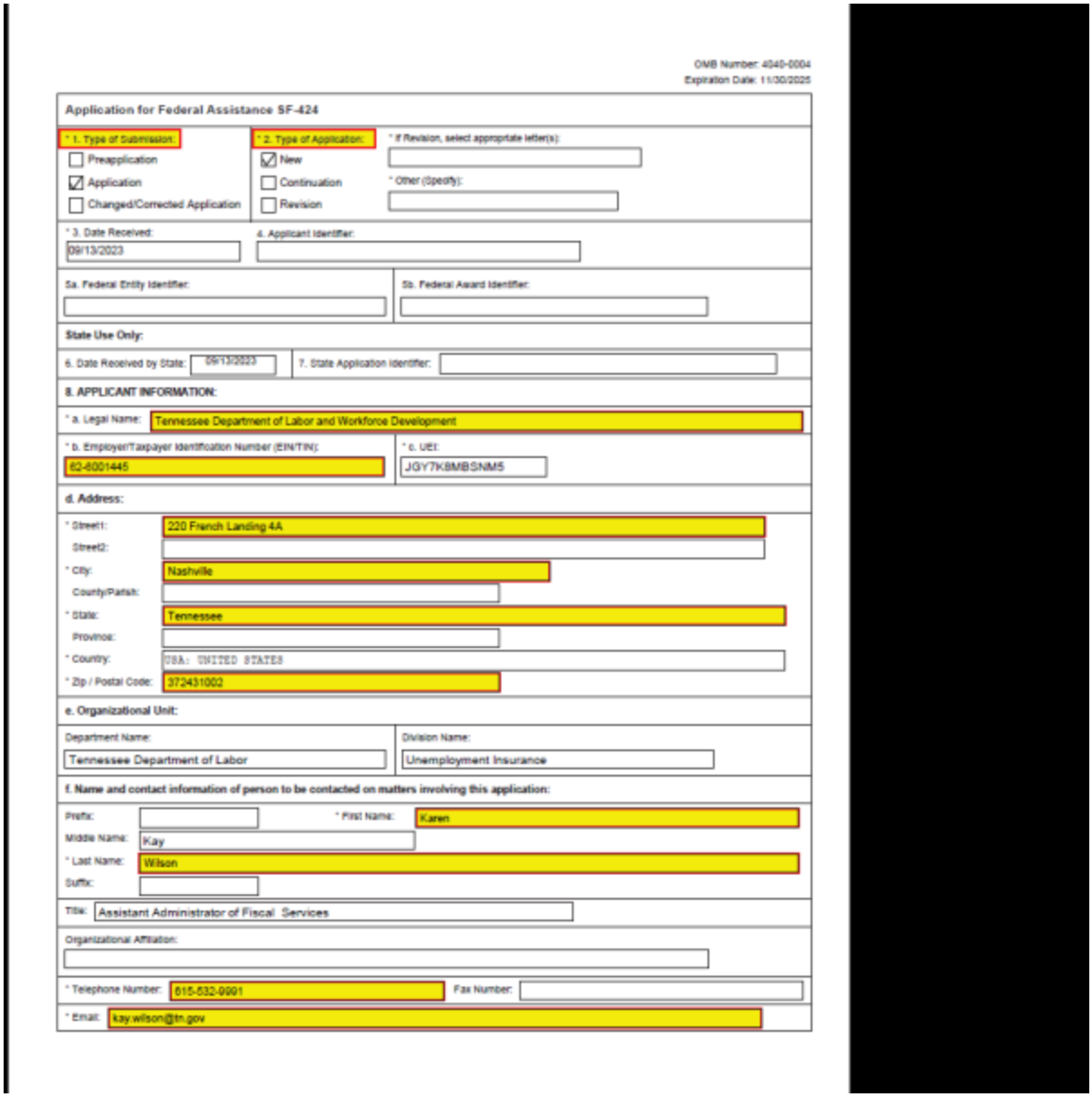
Tennessee's State Quality Service Plan (SQSP) was submitted to USDOL regional office via Alice Johnson on September 15,2023 and approved via the Signature page on November 11th, 2023, by Kimberly G. Staley. Tennessee is currently in the second year of the SQSP plan process.

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.

Tennessee's State Quality Service Plan (SQSP) was submitted to USDOL regional office via Alice Johnson on September 15,2023 and approved via the Signature page on November 11th, 2023, by Kimberly G. Staley. Tennessee is currently in the second year of the SQSP plan process. The targeted data budget for TN was $35,084,008 for Fiscal year 2024.

FY 2024 SQSP - Combined State Plan for WIOA State Plan Portal (1)



OMB Number: 4040-0004
Expiration Date: 11/30/2025

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☑ New	
☑ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:	4. Applicant Identifier:
09/13/2023	

5a. Federal Entity Identifier:	5b. Federal Award Identifier:

State Use Only:

6. Date Received by State: 09/13/2023	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:	Tennessee Department of Labor and Workforce Development

* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. UEI:
62-6001445	JGY7K8MBSNM5

d. Address:

* Street1:	220 French Landing 4A
Street2:	
* City:	Nashville
County/Parish:	
* State:	Tennessee
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	372431002

e. Organizational Unit:

Department Name:	Division Name:
Tennessee Department of Labor	Unemployment Insurance

f. Name and contact information of person to be contacted on matters involving this application:

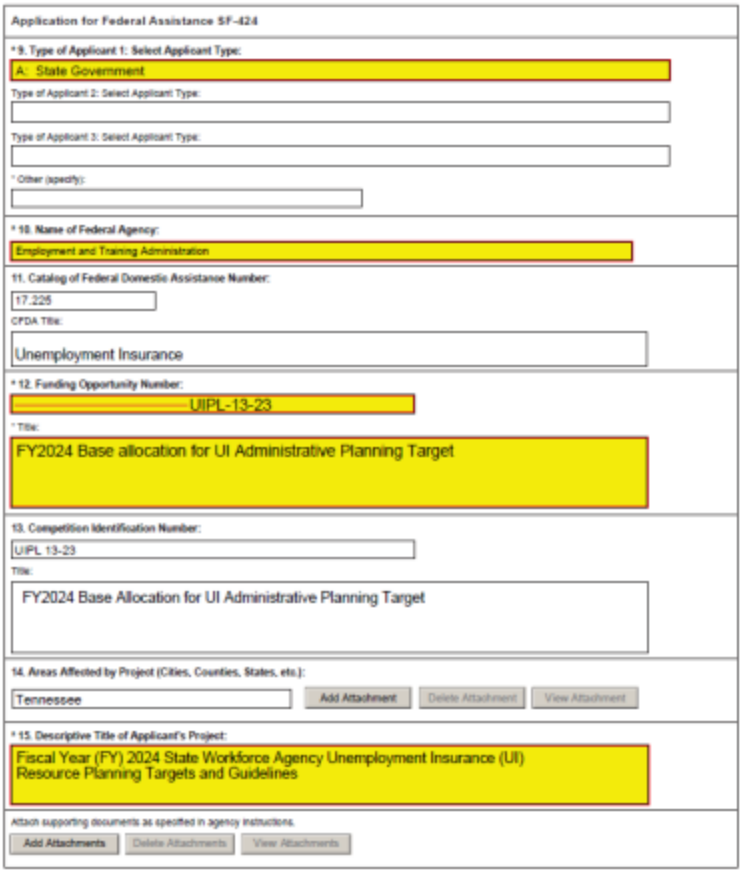
Prefix:		* First Name:	Karen
Middle Name:	Kay		
* Last Name:	Wilson		
Suffix:			

Title:	Assistant Administrator of Fiscal Services

Organizational Affiliation:

* Telephone Number:	615-532-9991	Fax Number:	

* Email:	kay.wilson@tn.gov



Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:
A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:
Employment and Training Administration

11. Catalog of Federal Domestic Assistance Number:
17.225

CFDA Title:
Unemployment Insurance

* 12. Funding Opportunity Number:
UIPL-13-23

* Title:
FY2024 Base allocation for UI Administrative Planning Target

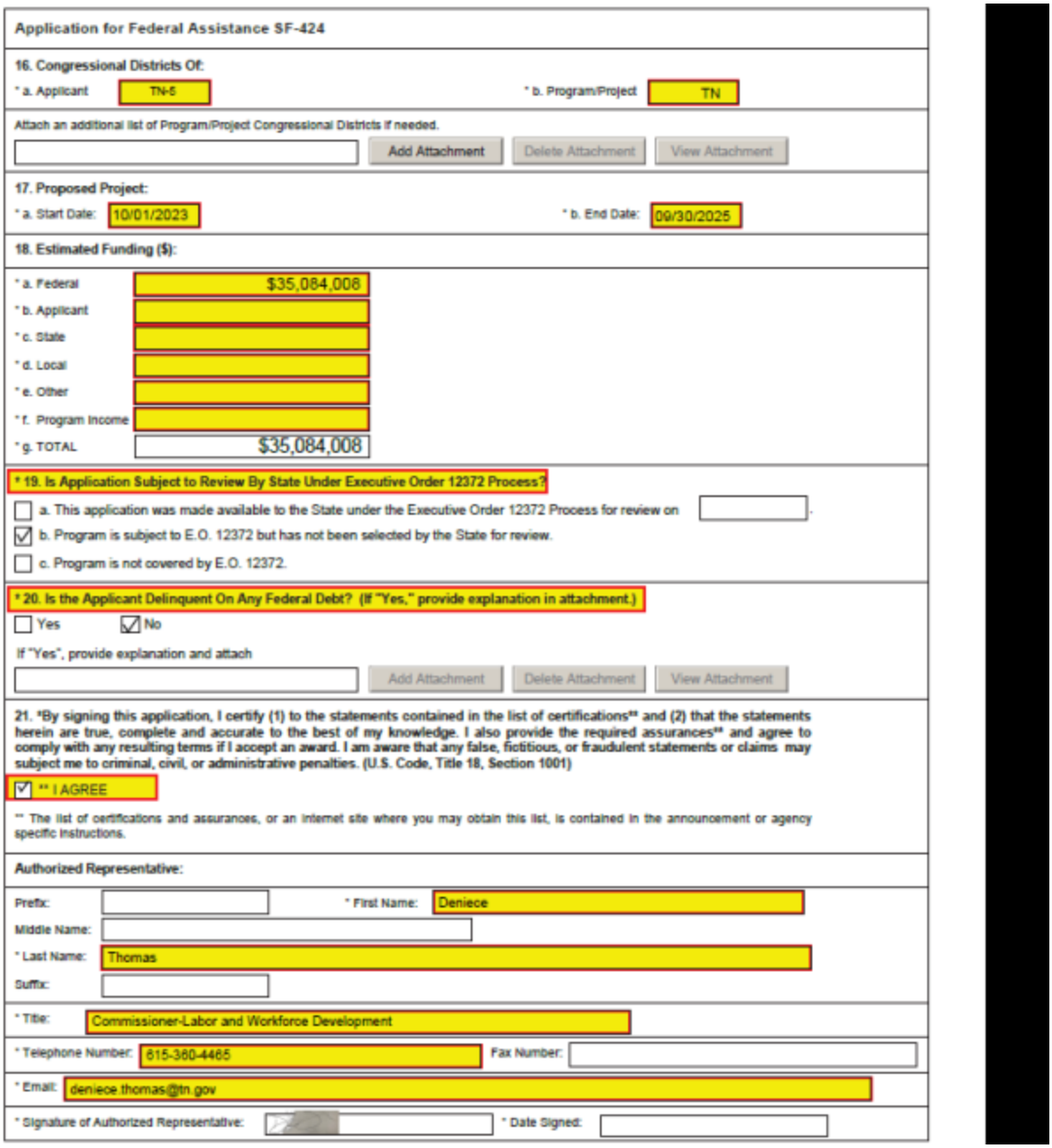
13. Competition Identification Number:
UIPL 13-23

Title:
FY2024 Base Allocation for UI Administrative Planning Target

14. Areas Affected by Project (Cities, Counties, States, etc.):
Tennessee
Add Attachment | Delete Attachment | View Attachment

* 15. Descriptive Title of Applicant's Project:
Fiscal Year (FY) 2024 State Workforce Agency Unemployment Insurance (UI) Resource Planning Targets and Guidelines

Attach supporting documents as specified in agency instructions.
Add Attachments | Delete Attachments | View Attachments



Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: TN-6 * b. Program/Project: TN

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2023 * b. End Date: 09/30/2025

18. Estimated Funding ($):

* a. Federal	$35,084,008
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	$35,084,008

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on

☑ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☐ c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☑ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☑ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name: Deniece

Middle Name:

* Last Name: Thomas

Suffix:

* Title: Commissioner-Labor and Workforce Development

* Telephone Number: 615-360-4465 Fax Number:

* Email: deniece.thomas@tn.gov

* Signature of Authorized Representative: * Date Signed:

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).

Tennessee's State Quality Service Plan (SQSP) was submitted to USDOL regional office via Alice Johnson on September 15,2023 and approved via the Signature page on November 11th, 2023, by Kimberly G. Staley. Tennessee is currently in the second year of the SQSP plan process. The targeted data budget for TN was $35,084,008 for Fiscal year 2024.

1. **National priorities**

Tennessee continues to align its strategies with the below national priorities that have been established for the UI program for FY 2024. The USDOL has also established the following additional priorities for FY 2023-2024 :

Improving State Capacity to administer and operate the UI program effectively.

For FY 2023-2024 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 are currently in the process of building a LMS (Learning Management System) that will be available to all agency staff to continuously offer training in any area that is identified as needing updates or improvements. The learning modules will align with BAM and BTQ quarterly and yearly findings to improve staff knowledge, as well as improve BTQ scores and improper payments discovered through BAM investigations. We will also 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.

TN is working to ensure equity in the program by examining the process and procedures a claimant goes through when filing claims and communicating with the agency. This has always been a continuing effort.

Improved Prevention, Detection, and Recovery of UI Improper Payments

For FY 2024, our top priority continues to be the prevention, detection, and recovery of improper payments. We will continue to examine UI Integrity functions through regular Integrity meetings, 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 2024 State Quality Service Plan to address current state-specific root causes of improper payments. Tennessee worked with the NASWA Integrity center and added the IDH and BAV to system processes in TN. TN will be working to add IDV to the IDH process as well by the end of the fourth quarter 2023. TN will also apply for additional funds through the SBR process to enhance the detection and prevention of improper payments.

Tennessee uses Lexis Nexis Risk Intelligent Network. This system will allow TN to defend against a spectrum of costly threats from identity fraud. They system will use multiple data sources from both internal agency data as well as large-scale external identity data sets to address risky identities and patterns. This program was implemented on July 31, 2020. We continue to work with the vendor to identify program strengths and areas for improvement. TN is working with Lexis Nexis to develop a process that will enhance the Q&A quiz function in claim processing. This process will use known fraud parameters to make the quiz more difficult for claimants that have these fraud parameters. These can include IP addresses, claimant address, Social Security number, and velocity that they attempt to file a claim. Lexis Nexis also provides TN with a data analytics outside of the systems we have in place on a monthly meeting.

Addressing Claim Backlog

TN is working to resolve the backlog created by the pandemic. Here are some steps we are taking:

Work to hire more merit staff for claims and adjudication processing.

Use contract vendors to help with claim verification, provide reports for specific claims for TN merit staff to adjudicate, and answer calls to the agency.

Continue to work with claims vendor Geographic Solutions to resolve claim system issues so performance of the system is improved as well as staff.

Utilize mass adjudication tool to adjudicate like claims after fact finding has been completed.

Continuous training of staff to improve understanding of law and policy and improve overall production of the teams.

Work with our Wired department to determine trends and gather data.

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 46 centers across the state via a partnership with WIOA and Local Workforce Development Area Partners.

1)

2) Re-Employment Services Eligibility Assessment (REASA) services- Tennessee currently operates the RESEA program in 46 one-stop career centers across the state. RESEA orientations and subsequent RESEA follow ups are conducted 5 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 regarding job matching and job placement.

3) 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.

4)

5) 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.

6) 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.

7) Re-Employment Workbooks- TDWLD 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

Tennessee will continue to monitor ETA reporting and verify date prior to submittal of all reports.

2. State priorities

State priorities and the strategic direction the state has adopted to ensure continuous improvement.

During FY 2023/2024 the Tennessee Department of Labor and Workforce Development intends to focus its efforts on the following:

Improving performance on the seven Core Measures and the six Secretary Standards listed below that are currently below the minimum acceptable level of performance (ALP): We have created CAPS for the standards below that state how we will work to improve our focus and performance in these areas:

Firsts Pay Promptness

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:

- Intrastate first payment timeliness
- Interstate first payment timeliness
- Facilitate Reemployment of Claimants
- Detection of Overpayments
- Recovery of Overpayments
- New employer liability determinations made within 90 days

Implementing measures that will help us meet or exceed the "GPRA goal" targets established by the USDOL for the below four performance areas:

- Intrastate first payment timeliness
- Interstate first payment timeliness
- Facilitate Reemployment of Claimants
- Detection of Overpayments

- Recovery of Overpayments
- New employer liability determinations made within 90 days

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. 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. Implement measures to correct deficiencies identified during the Tax Performance System (TPS) and Benefit Accuracy Measurement (BAM) program reviews, and Benefit Timeliness and Quality (BTQ).

Tennessee will consistently look to improve process and policy to improve performance in all categories.

TN is currently in the middle stages of a new benefits system by FAST Enterprises. This will improve our ability to provide a better process for our staff, claimants, and Employers. We have an initial target implantation date by the end of first quarter 2024.

For FY 2024 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, detect, prevent. and recover overpayments. Continual training will occur to build staff knowledge in all aspects of UI. We are currently in the process of building a LMS (Learning Management System) that will be available to all agency staff to continuously offer training in any area that is identified as needing updates or improvements. The learning modules will align with BAM and BTQ quarterly and yearly findings to improve staff knowledge, as well as improve BTQ scores and improper payments discovered through BAM investigations. We will also 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

Addressing Claim Backlog

- TN is working to resolve the backlog created by the pandemic. Here are some steps we are taking:
- Work to hire more merit staff for claims and adjudication processing.
- Use contract vendors to help with claim verification, provide reports for specific claims for TN merit staff to adjudicate, and answer calls to the agency.
- Continue to work with claims vendor Geographic Solutions to resolve claim system issues so performance of the system is improved as well as staff.
- Utilize mass adjudication tool to adjudicate like claims after fact finding has been completed.
- Continuous training of staff to improve understanding of law and policy and improve overall production of the teams.
- Work with our wired department to determine trends and gather data.

For FY 2023/2024, our top priority continues to be the prevention, detection, and recovery of improper payments. We will continue to examine UI Integrity functions through regular Integrity meetings, 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 2023 State Quality Service Plan to address current state-specific root causes of improper payments. Tennessee worked with the NASWA Integrity center and added the IDH and BAV to system processes in TN. TN will be working to add IDV to the IDH process as well by the end of the fourth quarter 2023. TN will also apply for additional funds through the SBR process to enhance the detection and prevention of improper payments.

Tennessee uses Lexis Nexis Risk Intelligent Network. This system will allow TN to defend against a spectrum of costly threats from identity fraud. They system will use multiple data sources from both internal agency data as well as large-scale external identity data sets to address risky identities and patterns. This program was implemented on July 31, 2020. We continue to work with the vendor to identify program strengths and areas for improvement. TN is working with Lexis Nexis to develop a process that will enhance the Q&A quiz function in claim processing. This process will use known fraud parameters to make the quiz more difficult for claimants that have these fraud parameters. These can include IP addresses, claimant address, Social Security number, and velocity that they attempt to file a claim. Lexis also provides TN with a data analytics outside of the systems we have in place on a monthly meeting.

3. Assessment of past performance and expected future performance.

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 2023/2024 SQSP measurement period for the 12-month period ending March 31, 2023 was 45.36%. We have attached a Corrective Action Plan (CAP) outlining the corrective measures we intend to take during FY 2024 to improve performance in this Core Measure.

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 2023 SQSP measurement period (the 12-month period ending March 31, 2023) was 53.47 %. We have attached a Corrective Action Plan (CAP) outlining the corrective measures we intend to take during FY 2024 to improve performance in this Core Measure.

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 2023 SQSP measurement period (the 4-quarter period ending March 31, 2023) was 68.32%.

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 2023 SQSP measurement period (the 4-quarter period ending March 31, 2023) was 46.72 %. We have attached a Corrective Action Plan (CAP) outlining the corrective measures we intend to take during FY 2024 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 54%. 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 7.90 % based on BPC data for the period 04/01/2019-03/31/2022 and BAM data for the period 10/01/2020-09/30/2022. We have attached a Corrective Action Plan (CAP) outlining the corrective measures we intend to take during FY 2023/24 to improve performance in this Core Measure.

Appeal 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 11.2 days for the FY 2023 SQSP measurement period, (the 12-month period ending March 31, 2023). We are currently meeting this measure for the past six months starting April 2022 ending September 2022.

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 6.4 days for the FY 2023 SQSP measurement period (the 12-month period ending March 31, 2023).

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 86.76% for the FY 2023 SQSP measurement period (the 4-quarter period ending March 31, 2023).

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, 2023, was 83.3 %

We have not met this because we continue to lose staff auditors and it is difficult to backfill these positions because of the competitive job market conditions. We are working to fill positions as quickly as possible.

Effective Audit Measures Summary:

The Effective Audit Measures for 2022 reveal that Tennessee's total score was 6.0 which does not meet the USDOL minimum score of 7.0. The percent of contributory employers audited scored 0.7%. This does not meet the minimum requirement of 1.0% meaning this category failed the review. Additional emphasis focused on the percent of wages changed because of the audit which is 3.5%. This is 1.5% above the minimum requirement of 2.0% meaning this category passed the review. The percent of the state's total wages that were audited is 0.8% which is .2% below the minimum requirement of 1.0%, and the average number of misclassified workers discovered per audit scored 1.0 which is equal to the minimum requirement of 1.0.

The overall score for the effective audit measures was 6.0 for 2022 which also fails to meet the minimum requirements of 7.0 set by the USDOL. The results reflected in this measurement process were clearly related to the continuing staffing challenges which directly impacted the process of audit activities during the 2022 audit year. The inability of the department to attract and/or retain talented audit staff is a growing concern which must be addressed to produce the results required by the USDOL.

Effective Audit Measures 2022 Score

Factor	Description	Minimum Score	TN Score
1	Percent of contributory employers audited	1.0	0.7
2	Percent of wages changed because of the audit	2.0	3.5
3	Percent of the state's total wages that were audited	1.0	0.8
4	Average number misclassified workers discovered per audit	1.0	1.0
	Total Score	7.0	6.0
	Minimum Level of Achievement Score	5.0	4.5

Factor	Description	Minimum Score	TN Score
	Additional Emphasis Requirement	2.0	1.5

TN is not meeting this measure due to staff turnover in the competitive market. We are working to hire audit staff to fill these positions as quickly as we can.

4. Tiger Team Grant Funds and Consultative Assessments

Tennessee is currently in development of a new benefits system that began on October 3, 2022. All resources that would be used for the Tiger Teams will be working on the new system project and all other resources will be maintaining the business functions for TN UI processes.

5. Coordination with other plans, including WIOA.

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 Workforce Services 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 (GPRA goals)

1. 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, 2023 was 46.10 %. Tennessee will examine processes to improve this score to meet or exceed the minimum level.

Detect Benefit Overpayments.

Target: Overpayments established will be at least 54.00% of the estimated detectable, recoverable overpayments. For the 12 months ending March 31, 2023, Tennessee established 59.44 % 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.

Establish Tax Accounts Promptly.

Target: 90% 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, 2023 was 80.31%.

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. The statistics show that Tennessee continues to improve in this measure with the most recent data showing 83.3% of employers established within given times.

2. Actions planned to achieve GPRA goals and targets.

We have submitted CAPS to facilitate the actions we plan to take to improve the GPRA goals for the state.

C. Program Review Deficiencies, if required

1. Causes for failures to conduct required reviews/activities, e.g., Benefit Payment Control, Internal Security, Benefit Accuracy Measure, and Tax Performance System and plans to conduct the reviews as required.

BAM did not pull the correct number of cases (480) for previous year. This was detected by the BAM supervisor and could not be corrected during that cycle. This has been corrected and is being monitored by the BAM supervisor. Currently TN is on pace to achieve 480 cases and a CAP is also attached within the SQSP process.

2. Explanation and planned actions if detection rate is over 95%

N/A

3. Causes for EAM failure and planned actions to address the deficiencies.

    a. Loss of audit staff throughout the state of TN.

Reporting Deficiencies, if required

Actions planned to correct reporting deficiencies. Reporting deficiencies are defined as missing reports, reports submitted late more than 50 percent of the time (7 of 12 months for monthly reports; 3 of 4 quarters for quarterly reports), and annual reports submitted late 3 consecutive years. N/A

a. Assurance of Equal Opportunity (EO).

b. Assurance of Administrative Requirements and Allowable Cost Standards.

c. Assurance of Management Systems, Reporting, and Recordkeeping.

d. Assurance of Program Quality.

e. Assurance on Use of Unobligated Funds.

f. Assurance of Prohibition of Lobbying Costs (29 CFR Part 93).

g. Drug-Free Workplace (29 CFR Part 98).

h. Assurance of Contingency Planning.

Provide the most recent dates for the following:

- Information Technology (IT) Contingency Plan Implemented: 2019
- IT Contingency Plan Reviewed/Updated : September 2021
- IT Contingency Plan Tested :

Nov 30-Dec 4 2022

i. Assurance of Conformity and Compliance.

j. Assurance of Automated Information Systems Security.

Provide the most recent dates for the following:

- Risk Assessment Conducted: 12/21/2022
- System Security Plan Reviewed/Updated : July 2022

k. Assurance of Confidentiality

l. Assurance of Disaster Unemployment Assistance

- Conducted Annual DUA Training for DUA Staff Yes

Provide the date of the training: Jan 2022

- Developed and/or Maintained a Standard Operating

Procedures for use during a major disaster declaration Yes

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.

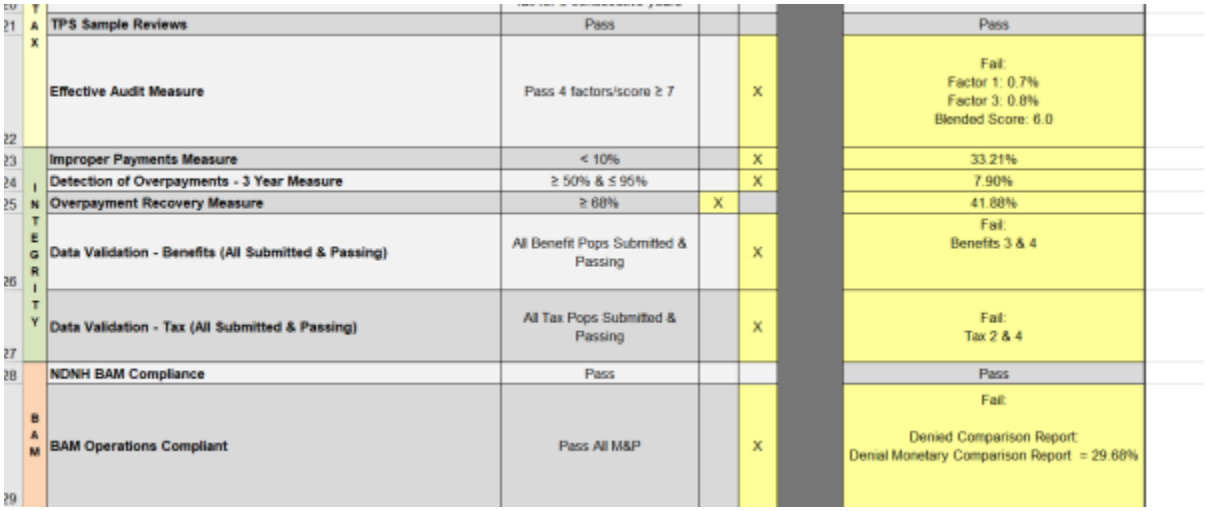
Tennessee's State Quality Service Plan (SQSP) was submitted to USDOL regional office via Alice Johnson on September 15,2023 and approved via the Signature page on November 11th, 2023, by Kimberly G. Staley. Tennessee is currently in the second year of the SQSP plan process.

TN FY23-24 SQSP Alternate Year CAPs and Quarterly Reporting Workbook.xlsx

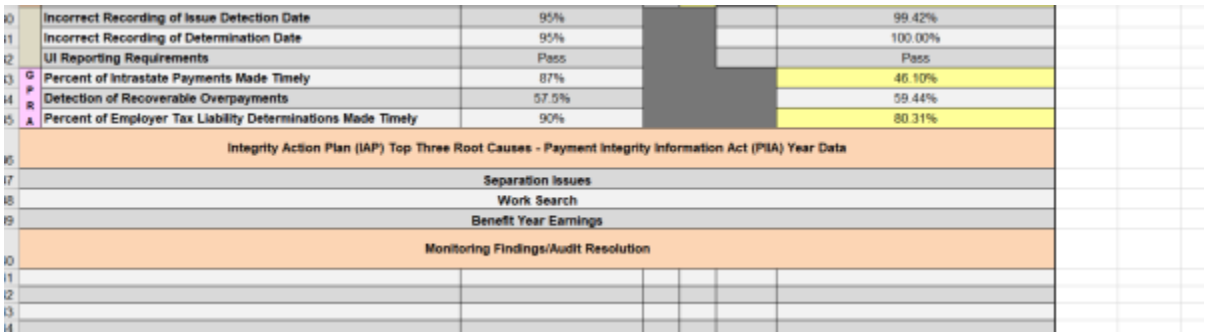
Tennessee

MEASURES/PROGRAMS TO BE ADDRESSED FOR ALTERNATE SQSP FISCAL YEAR (FY) 2024

	Measures/Programs to be Addressed (Each Measure Below is Hyperlinked to the CAP Worksheet)	Acceptable Level of Performance (ALP)	Corrective Action Plan (CAP) N	Corrective Action Plan (CAP) E	Narrative Required (In Word Doc.)	SQSP 2024 Performance Year Data
BENEFITS	First Payment Promptness	≥ 87%		X		45.36%
	First Payment Promptness (IntraState 14/21 Days)	≥ 87%		X		46.10%
	First Payment Promptness (InterState 14/21 Days)	≥ 70%		X		41.28%
	First Payment Promptness (IntraState 35 Days)	≥ 93%		X		65.16%
	First Payment Promptness (InterState 35 Days)	≥ 78%		X		61.76%
	Nonmonetary Determination Timeliness	≥ 80%		X		53.47%
	Nonmonetary Determination Quality - Separations	≥ 75%		X		68.32%
	Nonmonetary Determination Quality - Nonseps	≥ 75%		X		46.72%
APPEALS	Lower Authority Appeals (30 Days)	≥ 60%				77.92%
	Lower Authority Appeals (45 Days)	≥ 80%				88.44%
	Average Age of Pending Lower Authority Appeals	≤ 30 days				11.2
	Average Age of Pending Higher Authority Appeals	≤ 40 days				6.4
	Lower Authority Appeals Quality	≥ 80%				86.76%
TAX	New Employer Status Determinations Timelapse	≥ 70%				83.30%
	Tax Quality (Part A)	No more than 3 tax functions failing TPS in a year				Pass
	Tax Quality (Part B)	The same tax function cannot fail for 3 consecutive years				Pass



TAX	TPS Sample Reviews	Pass			Pass
	Effective Audit Measure	Pass 4 factors/score ≥ 7		X	Fail: Factor 1: 0.7% Factor 3: 0.8% Blended Score: 6.0
INTEGRITY	Improper Payments Measure	< 10%		X	33.21%
	Detection of Overpayments - 3 Year Measure	≥ 50% & ≤ 95%		X	7.90%
	Overpayment Recovery Measure	≥ 68%	X		41.88%
	Data Validation - Benefits (All Submitted & Passing)	All Benefit Pops Submitted & Passing		X	Fail: Benefits 3 & 4
	Data Validation - Tax (All Submitted & Passing)	All Tax Pops Submitted & Passing		X	Fail: Tax 2 & 4
BAM	NDNH BAM Compliance	Pass			Pass
	BAM Operations Compliant	Pass All M&P		X	Fail: Denied Comparison Report: Denial Monetary Comparison Report = 29.68%



	Incorrect Recording of Issue Detection Date	95%			99.42%
	Incorrect Recording of Determination Date	95%			100.00%
	UI Reporting Requirements	Pass			Pass
GPRA	Percent of Intrastate Payments Made Timely	87%			46.10%
	Detection of Recoverable Overpayments	57.5%			59.44%
	Percent of Employer Tax Liability Determinations Made Timely	90%			80.31%
Integrity Action Plan (IAP) Top Three Root Causes - Payment Integrity Information Act (PIIA) Year Data					
Separation Issues					
Work Search					
Benefit Year Earnings					
Monitoring Findings/Audit Resolution					

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.

Tennessee's State Quality Service Plan (SQSP) was submitted to USDOL regional office via Alice Johnson on September 15,2023 and approved via the Signature page on November 11th, 2023, by Kimberly G. Staley. Tennessee is currently in the second year of the SQSP plan process.

State Quality Service Plan (SQSP)

Integrity Action Plan (IAP)

Fiscal Year (FY) 2024

Accountable Agency Official(s).

List the person or persons accountable for ensuring integrity in the state's unemployment insurance (UI) program.

Name: Chris Russ

Title: UI Assistant Administrator Integrity and Recovery

Email: chris.russ@tn.gov

Phone: 615-253-5217

***Note:** Unemployment Insurance Program Letter (UIPL) No. 09-23, issued on June 30, 2023, makes reference to UIPL No. 22-21, Change 2, throughout the guidance. However, on July 13, 2023, the Employment and Training Administration (ETA) issued UIPL No. 10-23, which rescinded UIPL No. 22-21, Change 2. UIPL No. 11-23, also issued on July 13, 2023, changed the amount of the integrity grant funding originally issued under UIPL No. 22-21, Change 2, but maintained the guidance on required and recommended fraud prevention and detection and overpayment recovery activities.

- **(Topic #1: National Priority) – Ensuring UI program integrity by assessing and evaluating fraud risks, implementing, and maintaining sufficient controls to effectively mitigate the likelihood and impact of fraud, and reducing improper payments.**

- In evaluating fraud risks, states should consider both eligibility fraud risks and identity (ID) fraud risks.

- **State plans to evaluate UI fraud risks and implement and maintain sufficient controls to effectively prevent fraud and reduce improper payments, including state actions to develop their own state-specific antifraud strategy.**

-
    - Key elements of an antifraud strategy include:
        - **Who** is responsible for fraud risk management activities?
            - Chris Russ Assistant Administrator Integrity and Recovery.
            - Geicole Diggs Director of Integrity Unit
            - Robin Betts Director of Recovery Unit
        - **What** is the program doing to manage fraud risk?
            - Describe the program's activities for preventing, detecting, and responding to fraud, as well as monitoring and evaluation.

TN currently uses Lexis Nexis for ID theft protection and has used the funds provided to continue this process with Lexis Nexis. TN used the funs to also expand the BPC team from ten auditors to fourteen auditors and has plans to increase the audit staff by ten more auditors. We also are using a contractor to help the backlog of crossmatches (NDNH,SDNH, and Wage). TN will be looking at enhancing ID theft protection either through Lexis Nexis or with FAST

Enterprises internal solution with the new claims benefit system. TN will also implement two factor authentication with Fast Solutions Iris claims system.

-
    -
        - **When** is the program implementing fraud risk management activities?

            - Create timelines for implementing fraud risk management activities, as appropriate, including monitoring and evaluations.

TN is currently in the process of implementing a new claims benefits system. This is set for implementation date for February 20, 2024. We are currently evaluating our fraud detection and prevention processes to either incorporate them into our new system IRIS or addressing them after the implementation. We will be looking to improve our ID verification processes and are exploring several options which will include the USPS ID verification process as well as Login. GOV. We will also be evaluating our risk to determine if we upgrade our current system with our current vendor or request an RFP for that purpose. This will all be evaluated after the implementation in Feb 2024.

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    -
        - is the program focusing its fraud risk management activities?

            - Demonstrate links to the highest internal and external residual fraud risks outlined in the fraud risk profile.

The program is focusing its fraud risk management on both external and internal Risk.

The program has the Integrity Unit dedicated to combating external fraud including ID fraud. This unit uses various methods to detect and prevent improper payments. TN has an identification process all claimants must go through to file claims, changing PII, and changing banking information. TN also uses the SSA to verify identity. TN uses RECAPTCHA to detect threats from BOTS and the system does not allow claims to be filed from foreign addresses. These teams have regular meetings to discuss what is occurring, and how to prevent these incidents from happening. TN also has an internal Audit team that is responsible for in house fraud waste and abuse. This unit monitors all programs. TN does an annual risk assessment of the UI program and the last one was done 12/22 and the next one is schedules for 12/23. The agency identifies high risk area and determines the procedures when an incident happens as well as corrective action when it does occur.

-
    -
        - **Why** is fraud risk management important?

- Communicate the antifraud strategy to employees and other stakeholders, and link antifraud efforts to other risk management activities, if any.

- *See* A Framework for Managing Fraud Risks in Federal Programs at https://www.gao.gov/assets/gao-15-593sp.pdf for additional information.

- **State use of tools, services, strategies, process improvements, and/or procedural changes adopted by the state to combat fraud, verify identities, and enhance recovery efforts. States must identify which tools, solutions, and service provider(s) are used in the state's fraud management operations, including but not limited, to the following areas: data analysis, risk-based ID verification, fraud prevention and detection, and cybersecurity.**

-
    - Include strategies, solutions, and/or activities using funds the Department has made available to states for combatting fraud and strengthening UI program integrity under UIPL Nos. 28-20; 28-20, Change 1; 28-20, Change 2; 28-20, Change 4; 22-21; 11-23; and 02-22.

-
    - Identify which tools, solutions, and service provider(s) are used in the state's fraud management operations, including but not limited, to the following areas: data analysis, identity verification, fraud prevention and detection, and cybersecurity.

Tennessee uses Lexis Nexis Amplify ID. This system will allow TN to defend against a spectrum of costly threats from identity fraud. They system will use multiple data sources from both internal agency data as well as large-scale external identity data sets to address risky identities and patterns. This program was implemented on July 31, 2020. We continue to work with the vendor to identify program strengths and areas for improvement. TN is working with Lexis Nexis to develop a process that will enhance the Q&A quiz function in claim processing. This process will use known fraud parameters to make the quiz more difficult for claimants that have these fraud parameters. These can include IP addresses, claimant address, Social Security number, and velocity that they attempt to file a claim. Lexis also provides TN with a data analytics on a monthly all with them to go over patterns they see in our data. TN uses an internal dashboard by Tableau to analyze claims data for patterns and schemes. We can enter IP address, bank account information, address information, security question, and application ID. This enables us to analyze results to find claims that fit the pattern or scheme as well as identify the pattern or scheme. TN will be implementing multi factor authentication with our new claims system Iris (Fast Enterprises).

-
    - Provide details on overpayment recovery efforts including:
        - **Actions with banks, financial institutions, and with Federal law enforcement's forfeiture and seizure efforts.**

TN works with our TN Treasury Department to request funds back, when necessary, on Identity theft claims. We also work with our debit card vendor to request funds back when necessary. We work banks as well who have TN funds returned to TN. TN works with the Secret Service to get funds returned TN as well. We return all forfeiture and seizure cases the Secret Service sends us in hopes of getting the funds back to TN. We work with the OIG in the prosecution of cases and restitution for those cases.

TN offers the claimant the ability to pay in full or use a payment plan to repay overpayments. We also use benefit offsets to recover non fraud benefits. If a claimant does not make pay arrangements TN will garnish wages, sent to TOPS, or we can but a lien on property if necessary.

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        - **Information on how the state is using waivers of recovery of overpayments both for regular UI and temporary UC programs created by the CARES Act, including if the state is using approved blanket waivers as described in UIPL No.** 20-21, Change 1**.**

TN is not utilizing the blanket waiver process currently. TN has a waiver process in law that we follow. Upon written request by any person submitted to the administrator within ninety (90) days from the date of determination of the overpayment, the administrator shall waive repayment of the overpaid amounts if the person proves to the satisfaction of the administrator that all of the following conditions exist: (A) The overpayment was not due to fraud, misrepresentation, or willful nondisclosure on the part of the person; (B) The overpayment was received without fault on the part of the person; and (C) The recovery of the overpayment from the person would be against.

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TN is using TOPS for benefit overpayment recovery. Debt is flagged in the UI for TOP after 180 days with no response to repayment plans. Every Thursday we send an updated file to TOP with all debt balances that meets the TOP qualifications. If a debt is under bankruptcy after the debt is sent, we can manually mark the debt to not be TOP eligible, we can do this for any reason if needed. If a recoupment occurs in error, we refund the debt to the claimant.

- **State use of UI Integrity Center resources, with a particular focus on state connection to the Integrity Data Hub (IDH) and use of its datasets to cross-match unemployment compensation (UC) claims and aid in the prevention and detection of fraud and improper payments (*see* Training and Employment Notice (TEN) No.** 24-21**);**

-
    - Discuss the state's connection to the IDH, including frequency of IDH use.
        - Does the state submit all initial and continued claims for IDH cross-matching? If not, what is preventing the state from sending all claims?

Yes, TN sends initial and continues claims to the IDH for crossmatching.

-
    - If the state is not connected to the IDH and/or is connected but not regularly submitting UI claims data through a webservice/real-time connection to IDH, provide details on the state's plan for how to increase usage and an anticipated timeline to:
        - Connect to the IDH.
        - Increase frequency of IDH use.
        - Fully leverage all available IDH capabilities. IDH capabilities include:
            - Suspicious Actor Repository (SAR)

TN Uses SAR daily report

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        -
            - Multi-State Cross-Match (MSCM)

TN uses MSCM .

-
    -
        -
            - Identity Verification (IDV)
            - Bank Account Verification (BAV)

TN uses BAV daily report.

-
    -
        -
            - Fraud Alerting

TN uses Fraud alerting.

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    -
        -
            - Foreign Internet Protocol (IP) Address Detection

TN has an internal process for this that blocks foreign IP addresses.

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    -
        -
            - Suspicious Email Domains and Patterns.

TN gets weekly e-mails on suspicious e-mails from NASWA.

-
    -
        - Update the IDH connection to a webservice/real-time connection.

TN uses webservice.

-
    -
        - Identify barriers to using any of the available IDH capabilities.

IDH is a great tool, but it is a back in product that requires staff intervention and can be time consuming because of each item area of detection. At time false positives can be high. NASWA does a good job of enhancing the IDH to reduce false positives. An area that could be examined is front end measures that are more real time and enable the state to decide who is allowed in and who is not.

-
    - If the state has not executed IDH Participation Agreement - Version 5.0 (see TEN No. 24-21), provide details on the anticipated timeline to update to IDH Participation Agreement – Version 5.0.

TN has signed this.

-
    - Discuss the state's use of the UI National Integrity Academy's virtual trainings and/or eLearning lessons.

TN uses the Integrity Center's virtual trainings for BPC auditors.

TN attends monthly regional Integrity discussions with NASWA lead for our region.

-
    - 15-21).

TN currently incorporates information form the UI Integrity Knowledge Exchange Library resources into training for staff. TN is not currently using Behavioral Insights Toolkit but will look to this in the future once we have implemented our new benefits system Iris.

-
    - Discuss the state's participation in State Consultative Services.

Note: The IDH Team has a one-page dashboard report for each state summarizing current IDH utilization and areas where IDH use might be expanded. Please reach out to IDHTeam@naswa.org to request a copy of your state's IDH utilization dashboard report.

- **State use of required and recommended integrity controls and overpayment recovery activities as outlined in** UIPL No. 11-23**, including any additional effective cross-matching and overpayment recovery activities and identified best practices.**

-
    - Provide details regarding the state's use of each cross-match/integrity control and overpayment recovery activity (required and recommended) as outlined in UIPL No. 11-23. Include details on the frequency of crossmatch/integrity controls use (*e.g.*, conducted on all initial claims, all continued claims, only when suspicious activity is identified?) and frequency of overpayment recovery activities.
    - Cross-matches/integrity controls and recovery activities include:

<u>Cross-matches/Integrity Controls</u>

-
    -
        - ID Verification;

TN utilizes Lexis Nexis for Identification processing

-

- National Directory of New Hires (NDNH);

TN utilizes the NDNH . NDNH is done weekly

- Quarterly Wage Records Cross-match;

TN uses the Records wage crossmatch and processes this quarterly.

- Systematic Alien Verification for Entitlement (SAVE);

TN currently utilizes the SAVE process during claims process.

- Referral of allegations reasonably believed to constitute UC fraud, waste, abuse, mismanagement, or misconduct to DOL-OIG;

TN refers cases to the OIG

- UI Integrity Center's IDH;

TN utilizes the IDH

- Digital Authentication, such as Multifactor Authentication (MFA);

TN does not currently use this because of system issues with current vendor but will be utilizing this is new benefits system IRIS when it is implemented Feb 2024

- Device Fingerprint/Reputation Management;

TN does not currently use this

- Fraud Risk Scoring (*i.e.*, Case Management Prioritization);

TN has a system called Amplify ID by Lexis Nexis that provides fraud Risk scoring as well as claims system has this for investigations for crossmatches.

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    -
        - Comparisons and that detect shared characteristics;

TN uses reports and fraud analytics to detect shared characteristics.

-
    -
        - Social Security Administration (*i.e.*, Unemployment Insurance

TN uses SSA.

-
    -
        - Query (UIQ), Prisoner Update Processing System (PUPS), Death Master File);

TN uses PUPS.

-
    -
        - Federal, state, and local incarceration ;

TN uses both a state corrections crossmatch and uses PUPS to identify claimants who are incarcerated.

-
    -
        - Deceased Records cross-matches;
        - Vital Statistics cross-

TN does a vital stats crossmatch

-
    -
        - State Directory of New Hires (SDNH);

TN currently uses the SDNH, and it runs daily in TN

-
    -
        - Department of Motor Vehicle cross-

TN does not use DMV crossmatch currently but is looking to add this to the new system IRIS when it is implemented Feb 2024. TN does use a manual look up with TN DMV for identity issues.

-
    -
        - Interstate Benefits (IB) cross-match;

TN IB crossmatch

-
    -
        - State Identification Inquiry (SID) and IB8606 enhancements made to the Interstate Connection (ICON) network cross-match to prevent concurrent claim filing in multiple states;

TN utilizes this process during claims process

-
    -
        - Use of a unique identifier to identify claimants instead of using the full

TN assigns an application ID number (APP ID) for all claims

-
    -
        - Fictitious employer cross-

TN uses a 15 point crossmatch for this process

-
    -
        - Periodic IT security assessments and audits consistent with National Institute of Standards and Technology (NIST)-compliant information technology security guidelines;

TN has yearly IT security assessments that meet NIST

-
    -
        - Adequate internal controls to protect the integrity and security of state assets;
        - Implement a cross-functional integrity task force to develop and implement state-specific action plans to reduce UI improper payments.

Overpayment Recovery Activities

-
    -
        - Benefit Offsets;

TN currently uses benefit offsets for non-fraud overpayments

-
    -
        - TOP;

TN currently uses TOPS

-
    -
        - Cross Program Offset Recovery Agreement (CPORA);

TN participates in CPORA

-
    -
        - Interstate Reciprocal Offset Recovery Arrangement (IRORA);

TN currently participates in the IRORA.

-
    -
        - Negotiating repayment plans;

TN has payment plans will negotiate when necessary.

-
    -
        - Accepting repayments through various methods (*e.g.*, online, via debit/credit card)

TN does not utilize this process but will be once new benefits system IRIS is in place Feb 2024

-
    -
        - State Income Tax Offset Program;

N/A TN does not have state income tax

-
    -
        - Wage garnishments

Yes TN uses wage garnishments

-
    -
        - Property liens and assessments;

TN has the ability to do property liens

-
    -
        - Offsets of lottery winnings, homestead exemptions, and other benefits;

TN does not currently do this

-
    -
        - Active participation in probate and/or bankruptcy proceedings;

TN is active in bankruptcy proceedings

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    -
        - Skip tracing;

TN uses skip tracing

-
    -
        - Work proactively and collaboratively with banks and financial institutions;

TN does this when necessary

-
    -
        - Civil actions;

TN can take civil action if necessary

-
    -
        - Credit bureau referrals;

TN does not refer to credit bureaus

-
    -

- State/federal prosecution;

TN will turn over cases for prosecution

-
    -
        - Penalties and interest on overpayments in compliance with state and federal law;

TN charges 22.5% penalty and 1.5% interest.

-
    -
        - Collection agency referrals;

Not currently

-
    -
        - Implementing a voluntary fraud self-disclosure program;

TN has not implemented this.

-
    -
        - Other recovery methods as determined by state law or policy.

TN will be starting the process to accept electronic payments within the new system designed by FAST. Hopes are to have this by go live with FAST, but it could be post go live as well due to banking contracts. Go live is anticipated by the end of first quarter 2024.

-
    - Identify any additional integrity controls or recovery activities the state uses that are not listed in UIPL No. 11-23.

TN uses multiple bank account crossmatch on claims filed. This creates an issue on the claim if more than three claimants use the same routing and bank account.

TN uses state employee crossmatch to identify state employees who may be drawing benefits and working. This runs every state pay period.

TN uses Vital Statistics crossmatch to identify claimants who are drawing after date of death. This runs weekly.

-
    - Provide promising practices.
    - Identify challenges with cross-matches or in overpayment recovery activities.

- If the state does not currently use one of the integrity controls or recovery activities listed in UIPL No. 11-23, provide the state's plan and anticipated timeline to request and obtain access to the cross-match/integrity control or to implement the overpayment recovery activity.

Note: If the state does not plan to obtain access to a cross-match/integrity control or implement a specific recovery activity, please explain.

- **State use and employer participation in State Information Data Exchange System (SIDES) (*see* TEN No.** 12-16**).**

-
  - Provide details on the state's current usage of SIDES.
  - If the state does not currently use all available SIDES exchanges, provide the state's plan for how to connect to all SIDES exchanges and an anticipated timeline to implement each SIDES exchange. Sides Exchanges include:

    - Separation Information

TN currently uses SIDES for separation information.

-
  -

    - Monetary & Potential Charges

TN is working towards a new benefits system and anticipate having this functional in the new claims system.

-
  -

    - Additional Fact-Finding

TN is working towards a new benefits system and anticipate having this functional in the new claims system.

-
  -

    - Determinations & Decisions
    - Earnings Verification

TN currently uses SIDES for Earnings Verification

-
  -

- Benefit Charges

TN currently uses SIDES for benefit charge process.

-
    - Identify any barriers to SIDES exchange participation, either in state promotion or in employer adoption.

One of the main barriers is larger brokers not using the EV process. TN still gets a lot of paper responses from these brokers, and it is time consuming to work when we have our system geared to handle EV responses automatically.

- **State strategies designed to facilitate claimants' compliance with state work search requirements while also supporting their reemployment such as adoption of the work search requirements in the Model Work Search Legislation (*see* TEN No.** 17-19**).**

-
    - Outline the state's work search requirement and explain state challenges with work search improper payments.

TN requires claimant to either provide three employers where they did a work search or have a reportable service with the Workforce services division either in person or online. There are a few challenges TN faces with work search. Claimants will submit their work searches. The employer will report the claimant did not do the work search when the agency verifies it. It is verified the employer keeps records of employees who apply for work with them. Another factor is TN does give waivers for work search as other states due, so this has an impact on the improper payment rate as well. New TN will take affect in 2024 that will require the claimant to produce four work searches.

-
    - Discuss the state's plan to improve work search compliance by reducing work search errors and strengthening reemployment.

TN plans to improve work search compliance and strengthen re-employment by these strategies below.

When a claimant finishes their UI application VOS presents them potential jobs that fit into their work category that are within the VOS system.

VOS/JOBS4TN -All unemployment claimants create a job service application now they when they file a UI claim. Tennessee has fully implemented 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, like the services you would find in a brick-and-mortar center. All UI claimants will be required to create VOS accounts/profiles at the time they file their claim and will be encouraged to look for work through this process.

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 like 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.

- **(Topic #2) – State plans and actions to address the state's top three improper payment root causes in Payment Integrity Information Act (PIIA) 2022.**

-
    - Identify the state's top three improper payment root causes.

Separation Issues

Benefit year Earnings

Work Search

-
    - Explain the state's challenges in reducing improper payments in the top three root cause categories.

Large backlogs due to the pandemic played into the increase in the improper payment rate. System issues with Gus also played a role. The system automatically approved claims that should not have been approved. TN addressed this with the claims vendor Geographic Solutions to correct the issue. BPC unit had to help with claims processing for a period of time, so BPC work was backlogged as well, and BAM was put back on reviewing paid cases prior to BPC returning to overpayment work. TN had over one million claims filed as well so that has increased backlogs in BPC as well. Claimant are stating they are doing their work searches but employers are stating they are not. TN will go back to the claimant to get a rebuttal and most of the time the claimant fails to respond. This creates an improper payment even though the claimant provided the work search. TN does not have the waiver that other states have.

-
    - Discuss the state's plan to reduce improper payments in each root cause category.

Separations

Tennessee has had issues with the separation decisions. A new backlog has been created because of the pandemic. However, Tennessee has remained in regular contact with USDOL and NASWA during the pandemic in effort to correctly implement and adjudicate separations consistent with guidance from the CARES Act. Additionally, the Agency will also be participating in online training offered by NASWA Integrity Center for adjudication and claims agents. This will help with proper identification of separation issues and decision making on claims. The Agency is also reworking certification questions to detect separations better by

singling out the questions “Have you been laid off, quit, or discharged from a job during the week. The Agency also provides online videos and instruction on reporting separations from employment. We have implemented an acknowledgement to all certifications; this will require that that claimant acknowledge he/she understands he/she must report any additional separation before he/she can proceed to the certification process. TN will also be training staff on detection of the correct issue and separating employer in 2023 as the pandemic workload decreases. Adjudication training will also be conducted in 2024.

We continue to work with our vendor to correct system issues that resulted in claims being approve incorrectly.

Tennessee has implemented a Learning Management System (LMS) that will be used within the Department of Labor and Workforce Development units. The (LMS) "Schoology" will be used to develop eLearning courses and onsite/online training for new and current employees. The trainers, along with the members of management, will be able to track employees' training progress and knowledge quickly. Specifically, in the Unemployment Division, the LMS will better the claim quality by creating targeted modules to enhance the training experience and create individual one-on-one training that can be taken at employees' leisure. Additionally, each department will have a personalized section to house BTQ requirements and agency best practices focusing on areas of deficiency. The Unemployment Division is in communication with the TRAC unit and together they are reviewing the quality control forms currently being used and comparing them to what BTQ looks at when they review the claims quarterly. We are planning to alter the quality control form currently used in UI to mirror the form used by BTQ. Once we have made the changes and they have been approved the management staff will be introduced to the new quality control form and provided a training to ensure everyone is reviewing the claim the same way. Training for the adjudication team is centered around the BTQ scoring process to align adjudication better. The quality control training that will be given to the management staff in the Unemployment Claims Division is to help them have a better understanding of how the unemployment claims need to be reviewed in order to pass BTQ. The quality control process is a weekly mandatory responsibility to ensure management can assist the agents and adjudicators when needed and identify weaknesses if needed request for additional training. The information gathered from the weekly quality control reviews will be used to write the employees Individual Performance Plan. The quality control score given during the Individual Performance Evaluation (IPP) period will appear in each quarterly evaluation.

Benefit Year Earnings

Tennessee has identified an issue created during certification when the claimant reports earnings. If the claimant answered “yes” to the question “Did you perform work?” a text box is, then populated for the claimant to enter his/her gross wages. When the claimant completes the certification, a new screen appears that asks the claimant to report earnings. Many claimants are confused because they think they have already reported earnings in the first text box and do not report them a second time. The jobs4tn.gov system is unable to automatically deduct the earnings reported by the claimant in the first text box from his/her weekly benefit amount; only the wages reported after the certification is complete are automatically deducted. TN is starting a new claims benefit system, and this will be a part of this new system. TN hopes to have this completed by the end of the first quarter 2024.

Work Search

The main issue TN faces with the job search process is rebuttal statements from claimant when the employer states the claimant did not perform the work search. TN requires three work searches. When BAM receives the claim, they contact the three work searches provided. If the employer states, the claimant did not perform the work search BAM ask the claimant for a rebuttal statement. If the claimant fails to respond the week is overpaid and marked improper. TN does not have waivers for work search as some states due so these we must mark these improper. TN has a rebuttal process in place to determine if the employer responds no to the claimant contact. TN will be moving to a new benefits system Feb 2024 and will be enhancing the work search process to better capture the reason the claimant failed to do the work search. If the claimant states, they did not do three work searches the system will ask for a reason. If the reason falls under a waiver condition (Training or Medical) it will present fact finding so staff can either deny or grant the waiver. If they do not choose a reason, it will automatically deny that week.

- **(Topic #3) – State coordination and collaboration with the DOL-OIG and other state and Federal law enforcement agencies to investigate and prosecute UI fraud and recover overpayments. This should also include state plans to continue providing all confidential UC information to DOL-OIG for purposes of both investigating fraud and performing audits.**

The OIG has an agent located in Nashville that we work with and collaborate with on cases and claims. We share reports and have in person meetings when necessary to discuss cases. We also work with the Tennessee Bureau of Investigation to investigate cases of both external and internal instances of fraud. We work with the TN Department of Homeland Security as well to investigate and prosecute cases in TN. TN has and will also work with the Secret Service, and FBI to investigate and turn over cased to be investigated. We also work with the state and local Attorney General's offices to present cases for prosecution.

TN also participates in quarterly regional calls with the OIG. TN sends requested data files to the OIG as well.

- **(Topic #4) – State plans to strengthen program integrity in UI tax operations, including current activities and plans to identify and prevent worker misclassification, State Unemployment Tax Act (SUTA) Dumping, and fictitious employer schemes, and development/use of effective employer audit strategies (*i.e.*, use of remote audits).**

- Identify current activities and plans to address:
    - Worker Misclassification

TDLWD relies on its audit program to combat Worker Misclassification. Each Year, TDLWD obtains a 1099-NEC extract from the IRS and uses this data to select employers for audit which have a high probability of worker misclassification. In addition, investigations originating from wage protest assignments, employer liability investigations, and tips from other agencies or the public may lead to audit assignments. TDLWD has also identified certain industries which have historically misclassified workers. Audit assignments from these industrial sectors are selected along with random audit assignments. Employers found to have misclassified workers are probable candidates for re-audit to ensure continued compliance with TN Employment Security law.

-
    - SUTA Dumping

The SUTA Dumping Detection System (SDDS) is used to identify employers engaged in the practice of SUTA Dumping. Each month, TDLWD runs queries in a continual effort to locate possible SUTA Dumping cases. The query results are recorded and thoroughly researched by an auditor dedicated to SUTA Dumping detection. The results are reported to the USDOL on the ETA 581 as either SUTA Dumpers or other Tax Avoidance Investigations. The SDDS is updated annually to add wage data for each completed calendar year.

-
    - Fictitious Employer Schemes

TN currently uses a 15-point crossmatch of benefits and tax to address fictitious employer schemes. The system produces a report that is reviewed to determine if an employer has the potential to be fictious. If it is determined to be fictitious an investigation is started by a fraud auditor in BPC. The BPC auditor will involve the tax auditor once it is determined we need to investigate the company.

- Development/use of effective employer audit strategies (including, but not limited to, use of remote audits).

Since the COVID-19 pandemic, TDLWD has promoted the use of alternate workspace and remotely conducted audits. TDLWD continues to monitor public norms and adjust our policies and procedures to meet the needs of our staff and the public. Auditors will allow employers to determine if the audit will be conducted in-person or remotely. Employers may provide the required records through various means including secure email or OneDrive.

- **(Topic #5) – State plans and actions to strengthen internal security and ensure that all appropriate internal controls and processes are in place and are adequate to assess internal risks and threats, ensure program integrity, and minimize program vulnerabilities (*see* UIPL No.** 14-17**).**

TN has implemented Multi factor authentication for staff when they log onto the system. If will do every thirty days. It will do this prior to the thirty days if an employee changes IP addresses or devices they initially logged in from. TN follows all policy and procedures for the TOPS and SSA.

TN has an Internal Audit department that focuses on internal security of the entire agency. Internal Audit is an independent and objective assurance and consulting activity guided by a philosophy of adding value and improving operations of the department. Internal Audit

accomplishes its objectives by bringing a systematic and disciplined approach to evaluating and improving the organization's risk management, control, and governance processes. The improving aspect includes being responsible for the department's Internal Security Handbook.

TN does a yearly risk assessment over the whole UI program to address areas of risk and vulnerabilities. TN asses these areas

The oversight body and management should demonstrate a commitment to integrity and ethical values.

The oversight body should oversee the entity's internal control system.

Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives.

Management should demonstrate a commitment to recruit, develop, and retain competent individuals.

Management should evaluate performance and hold individuals accountable for their internal control responsibilities.

Management should define objectives clearly to enable the identification of risks and define risk tolerances.

Management should identify, analyze, and respond to risks related to achieving the defined objectives.

Management should consider the potential for fraud when identifying, analyzing, and responding to risks.

Management should identify, analyze, and respond to significant changes that could impact the internal control system.

Management should develop control activities to achieve objectives and respond to risks.

Management should design the entity's information system and related control activities to achieve objectives and respond to risks.

Management should implement control activities through policies.

Management should use quality information to achieve the entity's objectives.

Management should internally communicate the necessary quality information to achieve the entity's objectives.

Management should externally communicate the necessary quality information to achieve the entity's objectives.

Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.

Management should remediate identified internal control deficiencies on a timely basis.

3/23/2023 Update TN still uses all the processes above and will look to improve processes within the new UI system.

- **(Topic #6) – State plans and actions to evaluate the effectiveness and equity of fraud prevention and detection, ID verification, and improper payment reduction activities. State should include strategies to ensure that processes used to detect and prevent fraud are effective and do not limit the ability for a legitimate claimant to apply for and become eligible for UC. States implementing or using facial recognition technology in their ID proofing processes must also report findings from bias testing and provide updates on efforts to mitigate biases or barriers in this section of the IAP.**

-
    - Identify potential barriers that are created by fraud prevention and detection functions for legitimate claimants. Provide plans and actions designed to mitigate such risks.

TN is working to address this. Tn is looking into front end measures that will eliminate bad actors and allow eligible claimants to pass through the identification process in a seamless process. This process would include looking at the type of device being used to enter the system, the type of IP address being used, bot protection, and levels of knowledge-based authentication. If the claimant passes the initial phase of the process the system will allow them to pass through to file, the claim. Questions will then be presented based on the threat level of the claimant. If the detection level is low, it will allow produce regular knowledge-based questions. The higher the threat the tougher the questions can become and if it is ruled a complete threat then the system will automatically fail the claimant. TN is also looking into automated ID verification process that could verify if the id presented is real and if it is tied to the individual supplying it. They would take a picture of the front and back of the official state or federal issued ID. The option also exists to us facial recognition but that needs further scrutiny by TN.

TN is starting a new benefits system project and the vendor FAST has a fraud and detection system that would help us accomplish this or we could remain with our current vendor Lexis Nexis to do this. TN is also will be looking to use the USPS and Login.Gov processes once we implement the Fast (Iris) benefits system.

-
    - As required in UIPL No. 11-23, states must ensure there is at least one timely, effective, and accessible non-digital alternative to online ID verification, which should not be overly burdensome on applicants, limit access to public benefits programs or the timely receipt of benefits, or stigmatize members of the public in any way. Provide details on the state's non-digital ID verification option(s).

TN utilized the American Job Centers through out TN as its not digital ID verification process. Individuals can walk into these centers and have their ID verified in person.

-
    - Include how the state flags cases for suspected fraudulent activity and how investigation resources are assigned, including:

TN flags suspected identity theft through Lexis Nexis systems. The claimant must go through a set of questions and if they fail it puts an issue on the claim and requires them to provide

identification documents. TN does not currently use scoring elements due to the number of false positives it can create. TN also uses its crossmatches to detect fraud. The system will create investigations and work items for the BPC team. They investigate these items to determined fraud at that point and do not use a scoring system to do this.

-
    -
        - What risk scoring elements and/or prioritization elements are used.
        - How the risk scoring elements and/or prioritization elements are weighted.
        - How the state evaluates the weights based on false positives and negatives.
        - How risk scoring elements and/or prioritization elements are updated.
        - How the state ensures the fraud risk scoring and/or prioritization of cases does not negatively affect legitimate claimants.
    - Include details on how the state measures claimants' usage of both digital and non-digital identity verification options, how the state reviews digital services for false positive and false negatives, and how the state ensures legitimate claimants have alternative paths to prove their identity and/or resolve issues, including providing a possible recourse.

- **(Topic #7) – State plans and actions to mitigate negative consequences for victims of UI ID fraud, including ensuring simplified processes to remove the victim's liability for overpayments resulting from ID fraud.**

-
    - Include details regarding how the state provides a reporting mechanism for UI ID fraud on their websites, communicates status updates for such investigations, and takes action to protect the victim when the state determines that UI ID fraud has occurred (*see*UIPL No. 11-23 for more details on protecting victims of ID fraud).

TN public and employers the ability to report UI ID fraud through our website. This creates a ticket that is processed to the BPC unit to work the identified claim. TN works to communicate directly with the victim if possible.

-
    - Include the state's procedures for mitigating negative impacts on the UI ID fraud victim (*e.g.*, establishing a pseudo claim record, temporarily marking the overpayment as "uncollectible", etc.).

TN establishes a pseudo claim record if the claimant has no other claims on file with the agency. We do this because the pseudo replaces the SSN so we cannot displace other legitimate claims. If we cannot do a pseudo claim, we withdraw the claim that has been filed. TN does not hold ID theft victims liable for any overpayments on the claim.

- **(Topic #8) – If the state has not provided complete and accurate overpayment reporting on the ETA 227 reports (Overpayment Detection and Recovery Activities), and the ETA 902P report (Pandemic Unemployment Assistance Activities), the state must provide information on plans for improvement, including timeframes and milestones, for addressing the issue and ensuring complete, accurate, and timely reporting in FY 2024.**

- If the state has submitted all data for the ETA 227 or 902P reports, this section is not applicable, and the state can input "N/A".

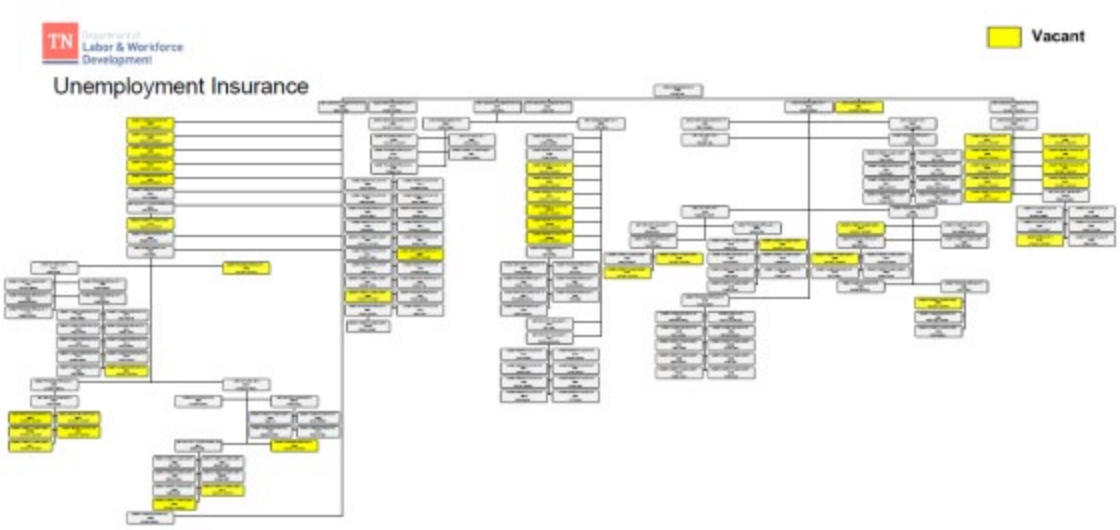
N/A

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.

Tennessee's State Quality Service Plan (SQSP) was submitted to USDOL regional office via Alice Johnson on September 15,2023 and approved via the Signature page on November 11th, 2023, by Kimberly G. Staley. Tennessee is currently in the second year of the SQSP plan process.

UI Organizational Chart 10022023.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.

Tennessee's State Quality Service Plan (SQSP) was submitted to USDOL regional office via Alice Johnson on September 15,2023 and approved via the Signature page on November 11th, 2023, by Kimberly G. Staley. Tennessee is currently in the second year of the SQSP plan process.

U.S. Department of Labor
SQSP SIGNATURE PAGE
OMB Control No.: 1205-0132 Expiration Date: 02/29/2024
U.S. DEPARTMENT OF LABOR Employment
and Training Administration
FEDERAL FISCAL YEAR
2024
STATE
TN
UNEMPLOYMENT INSURANCE STATE QUALITY SERVICE PLAN SIGNATURE PAGE
This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the

Department of Labor, Employment and Training Administration, and Tennessee Department of Labor and WorkforceThe Unemployment Insurance SQSP is part of the State's overall operating plan and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by the DOL, and adhere to the Federal requirements related to the use of granted funds. All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SQSP Handbook and will be subject to its terms.
TYPED NAME AND TITLE
SIGNATURE
DATE
Deniece Thomas Commissioner
STATE ADMINISTRATOR (print name)
09/15/2023
DOL – REGIONAL OFFICE APPROVING
OFFICIAL (print name)
DOL – NATIONAL OFFICE APPROVING
OFFICIAL (print name)
(if required) Kimberly G. Staley 11/7/2023

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.

Not applicable.

Tennessee’s State Quality Service Plan (SQSP) was submitted to USDOL regional office via Alice Johnson on September 15,2023 and approved via the Signature page on November 11th, 2023, by Kimberly G. Staley. Tennessee is currently in the second year of the SQSP plan process.

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.

Tennessee's State Quality Service Plan (SQSP) was submitted to USDOL regional office via Alice Johnson on September 15,2023 and approved via the Signature page on November 11th, 2023, by Kimberly G. Staley. Tennessee is currently in the second year of the SQSP plan process.

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

Tennessee's State Quality Service Plan (SQSP) was submitted to USDOL regional office via Alice Johnson on September 15,2023 and approved via the Signature page on November 11th, 2023, by Kimberly G. Staley. Tennessee is currently in the second year of the SQSP plan process. The new components will be submitted prior to the September 20, 2024 deadline.

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 website, the top five industries and occupations in the state that may provide employment opportunities in Tennessee are: 1) Office and Administrative Support Occupations, 2) Sales and Related Occupations, 3) Food preparation and Serving Occupations, 4) Transportation & Material Moving Occupations, and 5) Healthcare. According to, The Workforce Insights, Research and Reporting Engine Division of Tennessee, the top growing industries in the state are, ", Manufacturing, Transportation, warehousing and utilities, Technical services, Construction and Information" that are projected to see the most job increases. 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 COVID, PY 2020 -2021 we saw a drop in SCSEP enrollments. All our participants base were put onto Emergency Paid Sick Leave (EPSL) to reduce the monetary shock. Naturally, given the "shut down" the pandemic also effected outreach capabilities and recruitment efforts. Also, not to mention the psychological effects on the older community. The effects of the pandemic lasted longer than originally though. Because of this, Tennessee enrollment amounts are now beginning to rebound. Additionally, seeing an increase in interested host agencies and participants throughout the state. Furthermore, sectors, such as healthcare and business, as projected have grown. 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 mentioned, there are numerous occupations that are projected to increase. Most of those increases are skill sets that can be taught in host agencies. Occupations such as: Leisure & Hospitality, Health Care and Social Assistance, Transportation, Warehousing etc. This increase will directly translate, in our opinion, into a more diverse career opportunity for SCSEP participants. Tennessee understands the importance of creating an atmosphere where

participants have multiple, career-sector opportunities and training opportunities needed to enter gainful employment.

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 are stated previously indicating the fastest growing occupations in Tennessee. Additional employment opportunities include non-profit organizations (Goodwill), government agencies, and health care opportunities. SCSEP coordinators are tasked to conduct outreach in diverse ways. We must reach the older population that is most in need, which includes individuals with disabilities, Veterans, minorities, homeless and those who live in rural areas. Serving these populations present unique circumstances and issues that are relative to each participant make it harder to serve and find employment. However, all SCSEP coordinators have spent many hours doing weekly outreach and building business relationships throughout the communities served.

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. Agreements between local one stops will describe how services are 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 as well as to two national organizations, National Council on Aging and Center for Workforce Inclusion. 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))

One of the feature current services offered to participants is free transportation services. These highly sought after and include trips to the participant's community service assignment as well as free physical exams, gas card relief 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 when needed.

The SCSEP program plans to explore the possibility to partner with Meals on Wheels to provide nutrition for participants, especially those who unable to drive or have a particular barrier preventing them from driving (most common is a documented disability). Also, the SCSEP program will begin to actively recruit new host agencies giving participants a more diverse choice in acquiring new skill sets and training sessions. When possible, bringing in subject matter experts to speak with participants concerning a multitude of topics to support their

continued growth. Some topics include health promotion, nutrition benefits, computer skills, interviewing skills, resume skills and disease prevention. Specifically related to digital literacy, the state SCSEP coordinator is currently exploring the purchase of iPad/tablets to increase access points for participants who may have barriers getting to the AJC. Finally, we continue to streamline our referral process for those participants who 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.
- Increasing SCSEP access points by using other means of technology meeting the participant where they are
- 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 food banks and senior centers.
- 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.
- Network with local community businesses that serve the older Americans population to increase unsubsidized exits.
- Coordination with programs that serve individuals with special needs or disabilities such as Vocational Rehabilitation.
- 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. Participants 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.
- 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.
- Participate in communities job fairs when able.
- Increase SCSEP awareness in AJC as well as throughout the community by means of better more targeted advertisements.

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 and new initiatives for outreach to business and industry as identified in the Business Engagement Plan will include provision of services under SCSEP.

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. 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 ecosystem. Sub-grantee strategies include, but are not limited to:

- TItle I or Title II co-enrollment, where applicable
- Regular participation in American Job Center (AJC) partnerships meetings
- Referring eligible participants for SCSEP services to supportive services
- Using AJC's in the local areas, where feasible, as a host agency.
- Leveraging different funding streams to increase access to supportive services.
- Using community-based relationships to increase SCSEP referrals.

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 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 is to engage those employers in rural areas is one that is always evolving. SCSEP coordinators, in their perspective areas, have increased their outreach efforts into the business community. Building relationships that will yield participant into unsubsidized jobs. Also, give the geographical barrier in rural counties, what has traditionally 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.
- Continuous training for sub-grantees on topics including data validation, reaching rural population, most-in-need, meeting key performance measures, outreach methods, and best practices.
- Directing sub-grantees to hold meetings with 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 core measures 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. Prioritizing bilingual service delivery whenever possible to encourage full participation.
    e. 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)

Needed community services are social, educational, nutrition, assistance services (such as counseling, tax, financial etc.), transportation and reliable internet services. These services are most needed in rural communities of Tennessee, those being northeast, east, and southwest. Tennessee prides itself for being engaged in actionable partnerships to leverage resources across different agencies in those rural communities. Some of those organizations are Tenn Care, National Family Caregiver Support Program, Delta HRA, Southwest Human Resource

Agency, Appalachian Mountain “Project Access, Bethel Housing, and East Tennessee Human Resource Agency.

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 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 to promote employment opportunities for participants. Expand economic opportunities through utilizing On the Job Experience (OJE) for participants. Increase access points throughout the state allowing more SCSEP participants AJC services, coming to them if necessary.

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.
- 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.
- Encouragement of SCSEP sub-grantees to reach out to employers and host agencies to educate them on the value of hiring older workers.
- Encouraging further education, such as HSE, higher education, and technical training.
- 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))

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- 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.

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- 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 172 authorized positions that cover the following Tennessee Local Workforce Developments Areas (LWDA's) and their counties:

- Counties where the project will be conducted are below. Beside each county will be the positions for each county. There have not been any changes to the slot count from the previous year.
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- Northeast Tennessee: Carter (5), Johnson (3), Sullivan (7), and Washington (8)
- East Tennessee: Scott (4), Campbell (9), Claiborne (7), Union (4), Scott (4) and Morgan (4)
- Upper Cumberland: Macon (4), Jackson (3), Fentress (4), Putnam (5), Cumberland (5)
- Southwest Tennessee: Hardeman (5), Chester (2), McNairy (6), Hardin (5)
- Northwest Tennessee: Dyer (3), Obion (2), Weakley (5), Henry (6), Stewart (2), Montgomery (4), Houston (1), Cheatham (4), and Humphreys (3)
- Greater Memphis: Shelby (48)

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.

According to our state Governor Bill Lee, Tennessee distressed counties have reduced from 10 to 8. Those counties being Hancock, Cocke, Scott, Bledsoe, Clay, Perry, Hardeman, and Lake. These counties are considered rural with the lowest employments rates. This allocation and other allocations are based on data from TN.gov and Job4tn.gov websites.

Tennessee does not have any over-served counties. Rural Counties have been identified as under-served based on their locations within the state creating participant barriers to employment. Outreach efforts are being conducted to better serve individuals in rural areas. SCSEP coordinators in each of the identified rural counties, work with various organizations to be host agencies to provide SCSEP services to individuals to gain a more modern-day skill sets

that translates into the current job market. Tennessee has and will continue to outreach to the older population in ways to "meet" them where they are. This includes but not limited to:

- In-personal meetings- meeting them at their house, religious institution, gather centers etc.
- Direct mail letters of advertisement
- Presence at job fairs and job expos
- Electronic means- fax, virtual calls, phone calls, texts etc.
- Weekly/monthly presence at comprehensive AJCs
- Co-enrollment into other WIOA programs

B. EQUITABLY SERVES RURAL AND URBAN AREAS.

Serving older workers in both urban and rural areas requires a tailored approach that takes into account the unique characteristics, challenges, and resources available in each setting. While urban areas may offer greater access to job opportunities, and support services, rural areas often face challenges related to transportation, infrastructure and limited resources.

C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20 CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)

When selecting or determining eligibility of potential participants prior to TEGL 12-20 priority of service was provided to those 65 or older, disability, LEP, resides in rural area, are veterans (or spouses of veterans), low employment prospects and homeless or risk of homelessness. However, TEGL 12-20 included a new service priority to the list, that being, formerly incarcerated or on supervision from release from prison or jail within five years of the date of initial eligibility determination. Therefore, during the initial intake eligibility process, an assessment is rendered of the individual to see if he/she are entitled to the new priority of service.

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 the Tennessee Commission on Aging and Disability, estimates the older population totals are 1,662,608 for 2022. The older population is growing and for the first time in history the U.S. Census Bureau reports, in 2034 older adults are expected to outnumber children under 18 for the first time in history. There will be a constant need for the SCSEP program as it relates to gaining upgraded skill set of that population. 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.

Outreach includes services from WIOA, community outreach, assistance in providing transportation, workforce system referrals, promoting area businesses 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 encouraged to outreach to the American Job Center for at specific amount of time per week to recruit participants qualified to participate in the program.

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

- Distribution of services to individuals are relative according to the geographical area.
- Most of the individuals we serve reside in rural areas. Those counties are Fentress, Van Buren, Claiborne, Campbell, Union, Scott, Washington, Sullivan, Macon, Obion, Dyer, Weakley, Stewart, Houston, Chester, Hardeman, Hardin, McNairy

B. HAVE THE GREATEST ECONOMIC NEED

- Individuals in rural areas with low employment opportunities have the greatest economic need.
- Individuals in rural and urban areas both see barriers to employment as well. Those being but not limited to: transportation, no internet, sufficient resources avalible and nutrition.

C. ARE MINORITIES

- Distribution of minorities are throughout the state but in the SCSEP program mostly in the following counties: Shelby, Montgomery, Cumberland, Johnson. However, priority of services is given to minorities.

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.

D. ARE LIMITED ENGLISH PROFICIENT

- Limited English Proficiency individuals are distributed throughout the state as well, however, we do not have many enrolled in the program. We will need to work to improve these individuals' knowledge of the program and encourage increased enrollment as possible.

E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

Serving older workers with the greatest social needs requires a holistic and compassionate approach that addresses their diverse challenges and empowers them to achieve stability, independence, and well-being. By providing comprehensive support services, fostering community partnerships, offering empowerment initiatives, and promoting social engagement, states can create a supportive and inclusive environment where older workers with the greatest social needs can thrive and access the resources they need to succeed.

F. FORMERLY INCARCERATED INDIVIDUALS, AS DEFINED IN TEGL 17-20

Serving older workers who are formally incarcerated requires a holistic approach that addresses their unique needs and challenges in reentering the workforce. By providing reentry support services, skill development and training programs, employment opportunities, and wraparound support services, states can help older individuals successfully reintegrate into society, secure meaningful employment and build stable and productive lives after incarceration.

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))

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 is consulted and assists the grantee in preparing the request, not approving.

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.

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.

Metropolitan Action Commission (MAC) has notably created a Workforce Division which moved the existing adult education and MAC 4 Jobs program from the previous unit. This additionally includes initiatives for youth called POWER Youth and the programs funded by the WIOA Grant. Workforce (WF) is the division that's leading the city's efforts to help workers return and addressing staff shortages which have impacted many Metro departments. In addition to the industry specific certification programs in information technology and early childhood education, the agency has expanded into healthcare through a new EKG program which continues the agency's commitment to offering certifications in high income earning careers.

The Early Education and Youth Division has allowed the agency to serve the entire family at a greater level beyond the child enrolled in the Head Start and/or Early Head Start programs continuing the important Two-Generation work by providing meaningful internships for youth ages 13 to 24. The expansion of our Transformation and Innovation (TI) Division has accomplished the goal of assurance that all programs, services, and initiatives align with the adopted business framework (HSVC). All divisions are supported through data management and

analysis, supporting the agency's data driven decision making. The administration of the Workforce Innovation and Opportunity Act (WIOA) grant continues to bring together a system of providers in the community for in school and out of school youth. MAC also received a Rapid Cycle Impact Grant which expands the impact on poverty in the community as well as inclusion in the Tennessee Alliance for Economic Mobility funding for the county.

The agency's IDEA Entrepreneur program that provided an 8-week training intensive business management course which culminated with a "Pop Up" shop Presentation that showcased 10 Head Start and Early Head Start mothers that are either starting a business or expanding their business. The winner of the event was awarded $1,500 for their business. The second and third place winners won $1,000 and $500 respectively.

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.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - 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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	83.4		83.9	
Employment (Fourth Quarter After Exit)	82.0		82.5	
Median Earnings (Second Quarter After Exit)	7,800		7,850	
Credential Attainment Rate	72.4		72.9	
Measurable Skill Gains	72.3		72.8	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

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The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - 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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	84.3		84.8	
Employment (Fourth Quarter After Exit)	83.3		83.8	
Median Earnings (Second Quarter After Exit)	8,699		8,749	
Credential Attainment Rate	69.9		70.4	
Measurable Skill Gains	73.9		74.4	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - 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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	82.5		83.0	
Employment (Fourth Quarter After Exit)	80.1		80.6	
Median Earnings (Second Quarter After Exit)	5,234		5,284	
Credential Attainment Rate	64.5		65.0	
Measurable Skill Gains	60.3		60.8	

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

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The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

WAGNER-PEYSER ACT - 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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	65.2		65.7	

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Fourth Quarter After Exit)	64.8		65.3	
Median Earnings (Second Quarter After Exit)	6,499		6,549	
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 [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

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The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM - 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 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	50.0	50.0	51.0	51.0
Employment (Fourth Quarter After Exit)	50.0	50.0	51.0	51.0
Median Earnings (Second Quarter After Exit)	3,950	5,275	4,050	5,300
Credential Attainment Rate	42.0	52.0	43.0	52.5
Measurable Skill Gains	40.5	40.5	41.5	41.5
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

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The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

VOCATIONAL REHABILITATION PROGRAM (COMBINED OR GENERAL) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the

Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	65.0%	65.0%	67.0%	67.0%
Employment (Fourth Quarter After Exit)	59.0%	59.0%	61.0%	61.0%
Median Earnings (Second Quarter After Exit)	$4,400	$4,400	$4,488	$4,488
Credential Attainment Rate	25.0%	30.0%	27.0%	32.0%
Measurable Skill Gains	63.0%	63.0%	65.0%	65.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

VOCATIONAL REHABILITATION PROGRAM (BLIND) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or

Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)				
Employment (Fourth Quarter After Exit)				
Median Earnings (Second Quarter After Exit)				
Credential Attainment Rate				
Measurable Skill Gains				
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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

There are no additional indicators of performance.

OTHER APPENDICES

There are no other appendices.